

## Cycling for the Environment, for Health, for Pleasure

### Capital City Policy Review (Design Quality) Development Plan Amendment

Submission of the Bicycle Institute of South Australia

The Bicycle Institute of South Australia is a cyclist advocacy group that has existed since 1974. Originally formed as the Cyclist Protection Association, we exist to convince governments of the need to improve cycling conditions and to oppose measures that will make conditions worse.

We write to express our concern about the provision in the draft DPA to provide “the capacity to consider a lower bicycle parking rate in some circumstances”.

On reading the DPA, we find that the proposed amendment lacks any evidence or argument that it supports the objective of the DPA, which is to “reinforce design quality”? However the thrust of our submission relates to two further criticisms of the proposal. It

- lacks a sound basis in both logic and in the research required under the Development Act Regulation 9 (f) and
- does not accord with state and local government planning strategies.

There appear to be three reasons given for making the change:

- (1) the current requirements in the Adelaide (City) Development Plan are not the same as those provided in the SA Planning Library’s bicycle parking provisions for the Urban Corridor Zone and the Urban Core Zone
- (2) “given city resident’s proximity and access to key public services and facilities it could be argued that the city should be able to accommodate a rate lower compared to any other location, or at least provide some contemplation of a lower rate in some circumstances. This approach (ie circumstances where a lower rate may be considered) has been used in relation to vehicle parking in some mixed use zones in other Development Plans.”
- (3) The rates with respect to bicycle parking do not accord with “the more contemporary approach adopted for vehicle parking.”

In relation to (1), we argue that the bicycle parking provisions provided for in the SA Planning Library are themselves inadequate. Can it be seriously argued that a requirement for one bicycle park for every four dwellings reflects the State planning aspirations to “encourage more active lifestyles”, as provided in the current *30 Year Plan*?

We also argue that there is no strong case for consistency between the Planning Library and the Adelaide (City) Development Plan because conditions in the Urban Corridor Zones are different from the CBD. For example, public transport in the corridors typically provides direct links only to the CBD, whereas public transport in the CBD provides direct links to the whole metropolitan area. Also, traffic is a much more sensitive issue in the CBD than it is in the urban corridors. Why else would the Capital City Development Plan require no minimum parking for most of its area, whereas the Planning Library imposes minimum parking requirements?

We have quoted argument (2) because we are not sure what it means. It appears to be suggesting that the very convenience of the city centre means that people can walk to where they want to go; they don’t

need a bicycle. But there is no evidence given to support this contention, no evidence that people who live in the CBD don't use cars to access services that they could access by bicycle.

In fact there is no evidence presented at all to justify the change. How then can the DPA be said to meet the Development Regulation requirement 9 (f) that there be "investigations ... in order to address the strategic and social, economic and environmental issues of the proposed amendment"?

The only evidence we are aware of, which is not quoted in the DPA, is that the City has the highest levels of commuter cycling in the state. We would hardly see this as supporting reduced bike parking requirements.

The reference to "the more contemporary approach adopted for vehicle parking" in argument (3) is not explained, but we assume that what is being argued is that because minimum motor vehicle parking requirements have been removed for much of the CBD, the same should apply for bicycle parking.

To argue that what applies to motor vehicle should also apply to bicycles misses the whole point of removing vehicle parking requirements. Minimum parking requirements have been removed because of the costs imposed by such requirements; not only the financial costs (typically about \$40,000 per space) but the encouragement that minimum parking requirements give to car use, with the result of more traffic congestion, more vehicle emissions and less amenity. Minimum car parking requirements have been removed because ***we don't like cars in the city***. Contrast this with bicycles. These are being encouraged, possibly because of positive contribution to the local "vibe", but more likely because they provide an alternative to car use.

Finally, the proposal does not accord with a plethora of government planning strategies or DPAs.

- South Australia's *Strategic Plan* has a target to "double the number of people cycling in South Australia by 2020". The proposed amendment puts this further in jeopardy.
- Under the objective of "transforming the way we travel" the 30 Year Plan has an objective to change "the way we travel to and in the city including the promotion of active modes of transport such as walking and cycling". How will reducing bicycle parking requirements achieve this?
- Motorised transport accounts for about 40% of the CBD's carbon emissions. How will reducing bicycle parking meet the plan for a *Carbon Neutral Adelaide* by 2025?
- How does the proposal gel with Objective 64 of the *Adelaide (City) Development Plan*: "Access to and movement within the City that is easy, safe, comfortable and convenient with priority given to pedestrian and cyclist safety and access"?

The proposal to provide the capacity to reduce the car parking rate reads as if it were tacked onto the DPA due to political influence rather than for any soundly-based planning reasons. We suggest that if a Council had presented the government with such a DPA it would be rejected as inadequate. The people of South Australia deserve better.



Fay Patterson  
Chair, Bicycle Institute of South Australia  
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