



Victoria Walks Inc.
Level 7, 225 Bourke Street
Melbourne VIC 3000
P: 03 9662 3975
E: info@victoriawalks.org.au
www.victoriawalks.org.au
Registration No. A0052693U

23 May 2014

Submission on Planning Policy Framework (PPF)

Introduction

Victoria Walks thanks the Advisory Committee once again for the opportunity to meet with the Committee and provide an earlier written submission on this important process.

Victoria Walks applauds the Advisory Committee for developing a Planning Policy Framework (PPF) which elevates the status of walking as a transport mode and reaffirms the importance of pedestrian oriented urban planning.

The proposed changes to the PPF better recognise walking and reflect contemporary transport policy, including the Transport Integration Act (2010).

We are very pleased to see that these elements in the PPF are consistent with our earlier input to this process and thank the Advisory Committee for the positive response embodied in this policy.

Background – Victoria Walks

Victoria Walks is a walking health promotion body working to get more Victorians walking every day. Our vision is for vibrant, supportive and strong neighbourhoods and communities where people can and do choose to walk wherever possible.

Our cities, towns, neighbourhoods and urban areas have become largely automobile dependent and less walkable. This has contributed to the emergence of more sedentary lifestyles in which Victorians do not engage in the recommended levels of physical activity. Physical inactivity is a significant factor in the dramatic rise in the levels of obesity and preventable diseases such as Type II diabetes and cardiovascular disease.

Walking-friendly neighbourhoods and urban spaces are essential to encourage and enable people to walk. Walking is associated with positive health outcomes, improved fitness and better physical, social and mental health. Making towns, cities and suburbs more walkable has many health, environmental and economic benefits.

Detailed comments

03.08 Planning for urban growth areas

The overall direction of these policies are positive, but there is no explicit recognition of the need for pedestrian oriented activity centres; for higher density development around them; or for the areas surrounding activity centres to be designed for walking (or cycling). This contrasts with the explicit direction in Strategy 1.6 of section 03.08-A08-01 (Melbourne growth areas) – “Require the use of the Small Lot Housing Code and Residential Growth Zone around existing and proposed rail stations.”

For a wide range of policy reasons, the fundamental model for growth areas should be:

- Pedestrian-oriented activity centres (including intensive employment) served by rapid transit
- Medium density, walkable residential areas (and schools) within 1km of those centres
- Other land uses on the periphery or in the space between centres and their walkable catchments.

While we support the apparent intent of Strategy 1.6 of section 03.08-A08-01, to intensify development around railway stations, this should not be limited to residential development. Employment and services should also be located around railway stations, so the Commercial 1 or Mixed Use Zones are probably even more appropriate to achieve intensification.

Recommendations

1. Amend section 03.08-S-01 Planning urban growth areas State Policy Strategy 1.1 to read (new text underlined):

“Facilitate development that:

- a) Creates a sense of place and community.
- b) Supports the cultural development of the community.
- c) Provides a broad range of local business activities and employment opportunities.
- d) Creates greater housing choice, diversity and affordable places to live.
- e) Creates highly accessible and vibrant pedestrian-oriented activity centres, incorporating the majority of office, retail and community uses.
- f) Provides medium density residential neighbourhoods with excellent walking and cycling connections within a 1km catchment of activity centres.
- g) Reinforces the principal transport networks and provides for local transport networks.

- h) Supports adaptation to climate change and improves environmental sustainability.”
2. Amend Strategy 1.6 of section 03.08-A08-01 Planning urban growth areas.
- “Require the use of the Mixed Use Zone; Commercial 1 Zone; or Small Lot Housing Code and Residential Growth Zone around existing and proposed rail stations.”

03.09-S-01 Urban renewal State Policy

Victoria Walks supports this section, particularly Strategy 1.6 “Plan walking, cycling and public transport as the priority transport modes.”

Recommendations

- 3. Retain 03.09-S-01 Strategy 1.6.

03.10-S-01 20-minute neighbourhoods

Victoria Walks supports this section, particularly Strategy 1.6 “Create pedestrian friendly neighbourhoods and provide easy pedestrian movement within and between neighbourhoods.”

Recommendations

- 4. Retain 03.10-S-01 Strategy 1.6.

06.02 Urban Design

Victoria Walks supports this section, particularly the following strategies of 06.02-S-01:

- “Strategy 1.5 Provide safe, convenient and direct walking and cycling access to facilitate the development of twenty minute neighbourhoods.”
- Strategy 3.2 Design development to overlook public spaces with clear sight lines.
- Strategy 3.3 Support initiatives that provide safer walking and cycling routes and improved safety for people using public transport.”

Strategy 2.1 refers to the experience of “the user.” The risk is that ‘the user’ will be interpreted as those who use the private development that adjoins public space.

While this section is generally positive, the section on car parking (objective 5 and following strategies) is very disappointing. All of the provisions are oriented to providing better car parking for users and facilitating driving. Existing policies that seek to minimise the negative impact of car parking on the urban environment have been removed. These include the following elements of the current clause 18.02-5:

“Achieve a high standard of urban design and protect the amenity of the locality, including the amenity of pedestrians and other road users.

Create a safe environment, particularly at night.

Facilitate the use of public transport.”

The existing clause 18.02-5 and proposed Strategy 5.1 discourages on-street car parking, at least in residential areas, apparently because it increases road congestion (the reality of that assertion would be a site by site proposition). However on-street car parking makes for much better pedestrian environments because it slows traffic and sends the psychological message that the area is a destination, not a highway. On-street car parking is typically an efficient use of space compared to off-street car parking, which may be exclusively managed to serve particular businesses. The planning scheme should support on-street car parking rather than opposing it.

Recommendations

5. Retain 06.02-S-01 Strategies 1.5, 3.2 and 3.3.
6. Revise Strategy 2.1 to read:

“Design interfaces between buildings and public spaces, including the arrangement of adjoining activities, entrances, windows and architectural detailing, to improve the visual and social experience of the user, particularly pedestrians in public space.”
7. Delete Strategy 5.1
8. Rewrite Strategies under Objective 5 to address the negative urban amenity impacts of car parking.

08.01 Location of residential development

Victoria Walks generally supports this section. However there needs to be a clearer strategic mandate for higher density in and around activity centres. Although contexts vary and different approaches will be appropriate across metropolitan Melbourne and regional Victoria, there is a broadly applicable principle that residential development should be facilitated in and around town and suburban centres. The lack of clear implementation of this principle contrasts with the explicit direction to “Use the Neighbourhood Residential Zone across at least 50 per cent of Melbourne’s residential-zoned land.”

The wording of the policy for regional Victoria is unfortunate, as it portrays residential development as a ‘problem’ that needs to be managed. This may be true of rural-residential development but it is not generally true of housing within regional towns. Higher density development around regional town centres has particular value because quality public transport services are seldom available, so walking and cycling are the only alternatives to private vehicles in accessing the centre.

Victoria Walks generally supports 08.01-M00-01, Location of residential development, Regional policy: Metropolitan Melbourne, particularly strategic planning guidelines 3 and 5:

“3. Plan to accommodate the majority of new dwellings in established areas within walking distance of the Principal Public Transport Network.

5. Review policies for the application of the Residential Growth Zone to ensure that well-located neighbourhoods that are walking and cycling-friendly can accommodate an appropriate level of new housing so that more Melburnians can benefit from the healthy lifestyle available.”

Recommendations

9. Amend 08.01-S-01, Strategy 1.2 to read:
“Support higher density housing within the walkable catchment of town and suburban centres and on sites identified for residential growth.”
10. Amend the title of 08.01-RV-01 to read:
“~~Rural~~ Regional residential development”
11. Rewrite 08.01-RV-01 Objective 1 to read:
“To ensure the location of residential development supports infrastructure efficiency, economic development, sustainability and pedestrian oriented urban design.”
12. Add a new strategy under 08.01-RV-01 Objective 1:
“Facilitate well-designed medium density housing within the walkable catchment of town centres, to support local business and provide alternatives to vehicle travel.”
13. Relocate Strategy 1.1 to sit under Objective 2.
14. Retain 08.01-M00-01 strategic planning guidelines 3 and 5.

08.02-S-01 Housing diversity and affordability

Victoria Walks supports Objective 3 – “To encourage well-designed and appropriately located housing for older people” and the strategic directions beneath it. However it is unlikely that they will be sufficient to achieve the objective. More pro-active measures are required to ensure that housing for seniors enables them to access the services that are critical to their everyday lives.

Recommendations

14. Include new guideline for decision makers in section 08.02-S-01:
“Avoid purpose built housing for older people more than 1km (by foot) from activity centres, unless convenient public transport is available.”
15. Amend Strategic Planning Guideline 2 in section 08.02-S-01 to read:
“Consider the provision of social housing and housing for older people in precinct structure plans and activity centre structure plans.”

08.04-S-01 Aged accommodation

Victoria Walks supports this policy, particularly Guideline for Decision Makers 1(a):

“Residential aged accommodation should:

Be located in residential areas, activity centres and strategic redevelopment areas, close to services and public transport.”

Recommendations

16. Retain Guideline for Decision Makers 1(a) in section 08.04-S-01.

09.07 Commercial and retail uses

Victoria Walks is concerned by the prospect of office based employment and retail services dissipating throughout urban areas or in low density, low amenity industrial estates. These activities should generally be directed to pedestrian-oriented and public transport accessible activity centres. The policy appears to support that philosophy, for example 09.07-S-01 Strategy 1.1 says

“Avoid single use retail or commercial outside activity centres.”

The following Guideline for decision makers is included in section 09.07-M00-01:

“Out-of-centre proposals should deliver net benefit to the community in the region served by the proposal or provide small scale shopping opportunities that meet the needs of local residents and workers in convenient locations.”

We commend the Advisory Committee for re-affirming a centres based approach to employment location.

Recommendations

17. Amend 09.07-S-01 Strategy 1.4 to read:

“~~Facilitate~~ Identify commercial areas for ~~offices,~~ appropriate manufacturing and industries, bulky goods retailing, ~~other retail uses,~~ and associated business and commercial services.

18. Retain 09.07-S-01 Strategy 1.1 and the guideline for decision makers in section 09.07-M00-01.

12.01-S-01 The transport system

Victoria Walks supports Strategy 2.2:

“Provide walking and cycling infrastructure in all major new road projects.

Strategy 2.4 is:

“Plan car parking to support the efficient function of the transport system, particularly in locations which will have higher trip intensity.”

It is not clear what this wording means or intends. However there should be a policy to reduce or waive car parking requirements in locations that are well served by the Principal Public Transport Network. Standard car parking provision is neither necessary nor desirable in these areas, as extensive car parking serves to undermine the walkability of areas and encourages driving in locations where public transport use should be encouraged.

Recommendations

19. Retain Strategy 2.2.
20. Replace Strategy 2.4 with the following:
“Reduce or waive car parking requirements in locations that are well served by the Principal Public Transport Network.

12.02 Walking Networks

Victoria Walks strongly supports this section. The Advisory Committee is to be commended for elevating the status of walking as a mode of transport.

The State Policy includes:

Strategy 1.6 Avoid vehicular crossovers on the Principal Pedestrian Network.

Strategy 1.7 Reduce the number and impact of vehicle crossing points on the Principal Pedestrian Network.

While vehicle crossovers should certainly be avoided in pedestrian-oriented activity centres, this may not be realistic on the PPN more broadly. While the current Smart Roads model generally only identifies shopping streets as being on the PPN, the broader vision for the PPN is that routes *to* centres, not just *within* them, should have pedestrian priority. Under the PPN methodology many ‘normal’ residential streets will be identified as part of the PPN. On these streets, driveways for individual houses may not be a significant problem.

Crossovers are problems for pedestrians when:

- The design of the roadway and/or the crossover allows vehicles to enter or exit at speed
- The width of the crossover is more than one vehicle lane
- Design of the crossover does not intuitively reinforce the need for drivers to give way to pedestrians on the footpath
- Design of development requires or encourages vehicles to exit in reverse
- Design does not provide visibility between a pedestrian on the footpath and a vehicle exiting the driveway.

The visibility issue and to a certain extent the reversing issue is addressed by clause 52.06-8.

Prioritising pedestrians and encouraging motorists to give way (as they are legally required to do) can be achieved through the design of crossovers, such as continuing the material of the footpath over the material of the crossover, or elevating the footpath in relation to the accessway.

Victoria Walks strongly supports the first strategic planning guideline for metropolitan Melbourne:

“Strategic planning should:

1. Consider using lower speed limits in mixed-use and residential neighbourhoods in accordance with the new guidelines for 40 km/h pedestrian zones.”

Notwithstanding this support, we would point that the design of road environments as well as the posted speed limit is important in managing speed and that lower speed should also be encouraged in activity centres.

Recommendation

21. Rewrite 12.02-S-01 Strategies 1.6 and 1.7 as follows:

Strategy 1.6 Avoid and reduce the number of vehicular crossovers on the Principal Pedestrian Network, where possible.

Strategy 1.7 Reduce the ~~number and~~ impact of any vehicle crossing points required on the Principal Pedestrian Network by designing crossovers to minimise vehicle entry and exit speeds, allow vehicles to exit in a forward direction, provide for visibility between vehicles and pedestrians and emphasise the priority of pedestrians over vehicles.

22. Amend the first strategic planning guideline for metropolitan Melbourne to read:

“Consider using lower speed limits and designing for lower vehicle speeds in activity centres and mixed-use and residential neighbourhoods in accordance with the new guidelines for 40 km/h pedestrian zones.”

Conclusion

Overall, the proposed PPF is a significant improvement on existing state planning policy in relation to walking.

In particular, the proposed PPF:

- Recognises walking as a specific mode of transport, as it does for cycling, public transport and vehicles
- Re-affirms a centres based approach to employment location, providing the potential to build walkable environments around them.

Victoria Walks have suggested a number of refinements to assist in facilitating walking and pedestrian oriented design.

We are concerned that the policy appears to take a backward step in relation to car parking, but this should not obscure the generally positive moves towards pedestrian oriented design.

We would be happy to discuss any aspect of our submission. Please contact Duane Burt, Senior Walkable Communities Advisor on dburt@victoriawalks.org.au or 9662 3975.