



Recognising and upholding excellence in local government

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31 January 2020

Policy and Statutory Planning
Department of State Development, Manufacturing, Infrastructure and Planning
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Subject: *Creating healthy and active communities: mandatory provisions for neighbourhood design.*

OSCAR (Organisation of Sunshine Coast Association of Residents) is the peak body representing resident and community organisations on the Sunshine Coast. We are a non-partisan and not-for-profit incorporated association.

Please find our responses to these mandatory provisions on the following pages. These responses reflect material provided by the Department of State development, Manufacturing, Infrastructure and Planning in its *Information paper* published in December 2019.

OSCAR appreciates the opportunity to comment on the “*mandatory provisions for neighbourhood design*” and congratulates the government on considering this issue. In a period in history where decreasing size to include small lots housing is becoming the norm and the impacts of climate change, particularly the increase in summer temperatures, it is timely that community amenity and supporting healthy and active communities is approached within Planning Regulations.

OSCAR wishes the department well in its deliberations.

Yours sincerely

A handwritten signature in black ink that reads "Melva E Hobson".

Melva Hobson PSM
President

Email mail@oscar.org.au (NB our preferred form of communication)

Proposed provisions	OSCAR response
<p>Introduction</p> <p>Our streets, blocks, footpaths and street trees are the key foundations of every residential neighbourhood. The layout of streets and footpaths and presence of street trees have a major influence on whether residents will walk or ride either within, or to and from, their neighbourhood. While the buildings on these blocks will change over time, these key design elements provide the foundation of our communities.</p> <p>While this is beneficial, it is important that walking infrastructure is provided upfront as part of new residential development, so that communities can benefit immediately. Providing the walking infrastructure upfront also means local government will not need to retrofit existing neighbourhoods at a higher cost.</p> <p>The Queensland Government is setting minimum standards for new residential development to advance healthy and active communities by requiring:</p> <ul style="list-style-type: none"> • street trees on both sides of all streets • footpaths on at least one side of residential streets and both sides of main streets • access to parks and open space • maximum street block lengths of 250 metres • connected street patterns that respond to the landscape of the local area - this does not exclude cul-de-sac streets. • Our community's health and wellbeing must also be given this same importance. 	<p>Strongly support</p> <p><i>Walking paths and tracks in a variety of situations in established residential areas on the Sunshine Coast are well-used. However, many of these have had to be retrofitted as indicated in the Introduction.</i></p> <p><i>As urban densification increases and lot sizes decrease, with people living in communities with higher densities, it is imperative that these provisions are included as part of the development application and being a responsibility of the developer.</i></p> <p><i>There is still considerable retrofitting required in existing developments and ratepayer funds should be used for these NOT new developments.</i></p>
<p>Mandatory provisions</p> <p>The Queensland Government is progressing amendments to the Planning Regulation 2017 to require assessment managers to assess certain new residential development against specific assessment benchmarks that support walkable neighbourhoods. These amendments mean developers and local government must consider how neighbourhoods are designed for walking when preparing and assessing development proposals for new neighbourhoods.</p>	<p>Strongly support</p>
<p>The proposed mandatory provisions for neighbourhood design, alongside the model code itself and an updated version of the Institute of Public Works Engineering Australasia Queensland's (IPWEAQ) Street Planning and Design Manual: Walkable Neighbourhoods are about getting the fundamentals of new development right, in a consistent manner, across the state. Together, this suite of tools provide</p>	<p>Strongly support with one reservation</p> <p>OSCAR supports the getting the fundamentals right in a consistent manner across the state.</p>

Proposed provisions	OSCAR response
<p>a valuable resource for local authorities, engineers, planners, designers, practitioners and decision makers involved with planning and design of residential neighbourhoods.</p>	<p><i>However, OSCAR suggests that it is important that developers do not have any opportunity to water down or “negotiate” exclusions or some other proposal that weakens the impact of the provisions, based on arguments that suit them as opposed to community benefit.</i></p> <p><i>OSCAR also supports the use of the suite of tools such as State Planning Policy, Mandatory provisions, Model Code and the technical support as per the IPWEAQ manual.</i></p>
<p>Applicability of the Mandatory provisions</p>	
<p>The mandatory provisions would apply to a development application for the reconfiguration of one or more lots where:</p> <ul style="list-style-type: none"> • the reconfiguration is the subdivision of the lot into more than one lot • the created lots are primarily for a residential purpose and • the lot(s) that is to be reconfigured is in, or partly in, any of the following zones: <ul style="list-style-type: none"> > a residential zone (that is not a rural residential zone) or > a centre zone or > an emerging community zone or > mixed use zone and • the reconfiguration of the lot(s) will result in the creation or extension of at least one road (including public roads, private roads and no-through roads, but excluding driveways). 	<p><i>Strongly support</i></p>
<p>Assessment benchmarks</p> <p>The mandatory provisions will consist of assessment benchmarks relating to five key elements that the assessment manager must assess the development against, to the extent relevant. These assessment benchmarks will apply to code and impact assessable development and to variation applications.</p> <p>It is intended that local government planning schemes may, while not conflicting with the assessment benchmarks, include provisions that have different requirements. For example, where a higher rate</p>	<p><i>Strongly support</i></p>

Proposed provisions	OSCAR response
of street tree provision is met.	
<p>Element 1 Street trees on both sides of all streets</p> <p>Proposal</p> <p>An average of one street tree provided every 15 metres on both sides of all streets.</p> <p>Rationale</p> <p>The provision of shade to encourage walking is important for Queensland’s climate. Research indicates the more street trees along the footpath network, the more likely residents are to walk for 60 minutes each week.</p> <p>The proposed provision is a minimum requirement that a street tree is provided every 15 metres on average. This approach is intended to allow some flexibility with how street trees are provided, recognising that the verge is a competitive space, particularly for smaller lot frontages.</p> <p>Local governments will be best placed to determine appropriate shade tree species, responsive to the local climate and character of the area.</p>	<p><i>Strongly support</i></p>
<p>Element 2 Footpaths on at least one side of residential streets and both sides of main streets</p> <p>Proposal</p> <p>A footpath is provided:</p> <ul style="list-style-type: none"> • on both sides of access and collector streets; and • on one side of local access streets <p>Rationale</p> <p>Queenslanders consistently tell us they would walk more if there were more footpaths and the footpaths were wide, even-surfaced and more connected.</p> <p>Following feedback received, the provisions establish which street types require two footpaths and which, only one. These street typologies align with the IPWEAQ Street Design Manual Walkable Neighbourhoods – a commonly referenced document by many local governments and engineers. P</p>	<p><i>Strongly support</i></p> <p><i>Again many developments over recent years have:</i></p> <ul style="list-style-type: none"> • <i>narrow streets</i> • <i>inadequate provision for parking vehicles on property,</i> • <i>an increasing number of vehicles per household with the consequent overflow onto local streets,</i> <p><i>means that walking on the road, particularly with children and/or older residents has become a safety issue. A footpath is essential.</i></p>
<p>Element 3 Access to parks and open space</p>	<p><i>Strongly support</i></p>

Proposed provisions	OSCAR response
<p>Proposal</p> <p>Each created lot is 400 metres from the nearest boundary of an existing or committed local, district or regional park or other open space area (for example, linear park, esplanade, forest reserve, watercourse, coastal foreshore, habitat and wildlife corridors).</p> <p>Rationale</p> <p>Research indicates, 'adults with a wide range of green spaces around their home report 37 per cent lower hospitalisation rates and 16 per cent lower self-reported rates of heart disease or stroke.'²</p> <p>In response to feedback, the proposed provision expands and clarifies that a 'park' is not just limited to a local park, it includes green and open spaces that may not have embellishments but are accessible and usable for the community. This is reflective of the benefits that come from providing community access to a diverse range of parks, nature and open space.</p> <p>The distance is to be calculated from a boundary of a created lot to the edge of a park or other open space area as radial distance, not walking distance. The requirement also means that a created lot may be 400 metres from a park or other open space area that is outside the boundary of the lot(s) to be reconfigured.</p> <p>This provides some flexibility so that individual assessments can still factor in site specific scenarios where the 400 metre radial distance is separated by a pedestrian barrier (i.e. a major highway, rail line, river or other topographical feature), to achieve a reasonable walking distance to a park.</p> <p>The provision also reflects that where there is a commitment to a funded or approved future park, these are also relevant considerations that can be factored into assessments.</p>	<p><i>Again with increasing densities, smaller or minimal sized backyards, access to local parks and open space is critical for community health and well-being for both young and older residents.</i></p> <p><i>Open space either active or inactive in nature is also important for social interaction for residents. Again with the increasing tendency for fortress type residential construction and 2 metre high fences and gates on the street frontage the local park or open space is often the only means of communication within new neighbourhoods.</i></p> <p><i>Such spaces also for opportunity for small local gatherings, and celebratory days to be held building valuable social capital.</i></p> <p><i>These spaces not only support physical health but mental health and individual and community wellbeing.</i></p>
<p>Element 4 Maximum street block lengths of 250 metres</p> <p>Proposal</p> <p>Street block length is a maximum of 250 metres:</p> <ul style="list-style-type: none"> • from the centerline to centerline of intersecting roads; or • from the centerline of the intersecting road to the furthest lot boundary of the block, where there is only one intersecting road. <p>Rationale</p> <p>Feedback received indicated that 130 metre maximum street block lengths or 200 metre maximum</p>	<p><i>Strongly support</i></p> <p><i>Comment – when did the Queensland Government adopt American spelling? In official documents one would consider the “centreline” would be the correct spelling, not the American “centerline”.</i></p>

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<p>street blocks with a mid-block pedestrian link did not provide enough variation for block design.</p> <p>The 250 metre maximum is reflective of block design practices and represents a maximum block circumference between 500 and 600 metres, which is a comfortable five minute walk around the block. It is important that the provisions are clear about how the length of a block is actually measured. The measure from centerline to centerline is consistent with engineering standards in road standards. In response to feedback, there will no longer be a requirement that a mid-block pedestrian link is needed for block lengths over 200 metres. Mid-block pedestrian links remain a useful tool to assist in achieving a legible, connected pedestrian layout and would be encouraged as best practice. These are best considered based upon the specifics of the proposed design, mix of uses and locations of existing or proposed public transport stops – where there are natural pedestrian desire lines.</p>	
<p>Element 5 Connected street patterns that respond to the landscape of the local area</p> <p>Proposal</p> <p>The layout of the street network is a connected and legible grid-like pattern that is responsive to topography.</p> <ul style="list-style-type: none"> • The layout demonstrates pedestrian and cyclist connectivity. • The layout provides for connection to existing and future adjoining land development where relevant. <p>Rationale</p> <p>Connected streets encourage walking and cycling and make places easier to navigate. The grid-like network allows for easy navigation, the ability to ‘walk around the block’ or within or between neighbourhoods. A grid-like network does not need to be the iconic straight lines and 90-degree angles. A grid-like pattern can have diversity in the street layout, responding to topography and natural features. The use of cul-de-sac streets is not excluded and councils can determine standards suited to their local areas. Grid-like streets don’t have to mean increased speed and unsafe streets. There are many effective street calming design solutions that manage through traffic and provide clear signals to drivers they are in a residential area. Neighbourhoods designed for people, not cars incorporate these features</p>	<p><i>Strongly support</i></p>