



01/09/2019

Department of State Development, Manufacturing, Infrastructure and Planning

1 William St, Brisbane City QLD 4000

Via email: [planningpolicy@dsmip.qld.gov.au](mailto:planningpolicy@dsmip.qld.gov.au)

Dear Sir/Madam,

**RE: SUBMISSION ON CREATING HEALTHY AND ACTIVE COMMUNITIES**

**INTRODUCTION**

Wolter Consulting Group (WCG) congratulates the Queensland Government on the initiative to address a range of design issues that are affecting our emerging communities. WCG supports the rationales that underpin the initiative to create healthy and active communities, an initiative that clearly aligns with our desire to be a liveable, prosperous and affordable State. As a development consulting firm that designs and attains approvals for a wide range of clients in Queensland, WCG are at the 'coal face' in implementing the outcomes of this Policy.

WCG has prepared the following response to the Creating Healthy and Active Communities document, however, to highlight several concerns with the document, its wording and how it is to be implemented and its consultation process. These concerns include:

**1. Wording and Mandatory Outcomes**

The intent of the Creating Healthy and Active Communities document, prepared by the Queensland Government, is to seek advice on a number of 'mandatory' components. These components are based on five Provisions which include both a rationale and the proposal for what we understand will be the 'mandatory' element. As previously stated, WCG applauds the Queensland Government in addressing these issues and, generally, the rationales are supported in-principle across the five components.

WCG has significant concerns regarding the absolute nature that several of the provisions and proposals incorporate. It is important that a document such as this clearly establishes the overall

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intent of the State, however absolutes such as “street blocks are provided as a grid pattern”, for example, do not allow for flexibility and produce only one solution to creating walkable communities that are easily to move about.

To assist, WCG has provided a more detailed response to the five components and some suggested wording changes which we believe maintain the same intent but allow for place-based solutions.

Mandatory Elements	WCG Comments
<p><b>Provision 1</b>  <b>The street network is based on a grid-like structure to encourage ease of movement and walkability</b></p>	<p>WCG encourages the intent of providing a “grid-like” structure to promote movement and walkability for our emerging communities. Grid-like plans allow for a degree of flexibility to facilitate unique design outcomes that suit community interest.</p>
<p><b>Rationale</b>            Neighbourhoods should be designed to prioritise walking, cycling and access to public transport, parks and other uses. The way streets are designed can influence these outcomes. Therefore, streets should be designed to be connected, easy to get around and logical to navigate</p>	<p>WCG agrees with the rationale of Provision 1.</p>
<p><b>Proposal</b></p> <ul style="list-style-type: none"> <li>▪ Street blocks are provided as a grid pattern.</li> </ul>	<p>WCG does not support the notion of all subdivisions provided as a grid pattern, without exception. Guidelines should always provide for innovation and alternatives to be considered if it achieves the rationale.</p>

Mandatory Elements	WCG Comments
<p><b>Provision 2</b>  <b>Limit the use of cul-de-sac streets. Where cul-de-sac streets exist cul-de-sac heads allow through access for pedestrians and cyclists</b></p>	<p>WCG agrees cul-de-sacs have their place in urban design but should be kept to a minimum.</p>
<p><b>Rationale</b>            Design promotes the continuance of the grid layout and enables connections to existing and future developments, parks and open spaces.</p>	<p>WCG supports the rationale of providing a ‘connected network’, enabling connections to existing and future developments and mixed use precincts to promote walkability. Whether that connectivity is within a grid layout or not, we believe it is of higher importance to promote a ‘connected network’ instead of a strict absolute which may result in a poorer outcome.</p> <p>Strict use of grid layouts only is limited in how it deals with slope and grade; it is imperative therefore that design options that can relate to a site’s natural characteristics can be utilised where necessary.</p>

<p><b>Proposal</b></p> <ul style="list-style-type: none"> <li>No more than 20 per cent of new allotments are to be accessed off cul-de-sacs.</li> <li>Cul-de-sacs enable future connections to adjoining land and development and provide for through pedestrian and cycle access.</li> </ul>	<p>The specification of a maximum percentage is potentially redundant when considering the intent. It may also be problematic dependent on the size and scale of the community and its master plan, where one applies.</p> <p>E.g. will the 20% of new allotments apply to a single application that has a single road and 40 lots?</p>
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Mandatory Elements	WCG Comments
<p><b>Provision 3</b> Have footpaths complemented by street trees on both sides of most street</p>	<p>WCG appreciates the positive impact of street trees upon amenity and walkability.</p>
<p><b>Rationale</b></p> <p>Movement networks, including streets and pathways, are the key building blocks of every residential neighbourhood. This infrastructure must facilitate walking.</p> <p>With Queensland’s climate we also need to provide shade and shelter.</p>	<p>WCG agrees with the rationale of Provision 3.</p>
<p><b>Proposal</b></p> <ul style="list-style-type: none"> <li>Minimum 1.5-metre-wide footpaths on one side of every street (including cul-de-sacs).</li> <li>Minimum 1.5-metre-wide footpaths on both sides of: <ul style="list-style-type: none"> <li>main streets (connector or collector streets)</li> <li>every street within 800 metres distance of a school (e.g. 10-minute walk)</li> <li>every street within 400 metres distance of a park (e.g. 5-minute walk)</li> <li>every street within 200 metres distance of local shops /services/ facilities (e.g. 2-minute walk)</li> <li>every street where the net residential density is greater than 20 dwellings/hectare</li> </ul> </li> <li>Street trees provided in association with footpaths: <ul style="list-style-type: none"> <li>one tree per lot where allotment frontage is less than 15 metres</li> <li>two trees per lot where allotment frontage is between 15-25 metres</li> <li>on lot frontages greater than 25 metres—trees to be spaced so that canopies interlock at maturity</li> <li>for footpaths not associated with residential frontages—trees to be spaced so that canopies interlock at maturity</li> </ul> </li> </ul>	<p>The proposal may require further clarification as the minimums would suggest that all roads within a new community will require footpaths on both sides of the street.</p> <p>Is it the intent of the State Government to mandate footpaths on both sides of all streets within new emerging communities?</p> <p>WCG believes that street trees should be associated with streets, not footpaths. This is due to the concern with frontages less than 15m (suggest amending 1 street tree between every 15m).</p> <p>7.5m frontages for Multiple Dwellings do not allow sufficient space to incorporate a tree / light/ electricity post in the verge, as well as incorporating the driveway and crossover.</p>

Mandatory Elements	WCG Comments / Recommendations
<p><b>Provision 4</b>  <b>Have blocks no longer than 130 metres with longer blocks having mid-block pedestrian links</b></p>	<p>WCG does not support the notion that the only means of achieving improved connectivity, and to improve pedestrian permeability, is with mid-block links. Master plans should be developed to incorporate pedestrian mobility plans that address key paths, linkages as well as destinations. The result of this may include blocks that have mid-block links, however it may also have suggested other alternatives. It is important to note that the road pattern and off-set grids will have a greater impact on the ability to improve connectivity than the provision mid-block links alone.</p>
<p><b>Rationale</b>  Large blocks of land (e.g. over 130 metres) can be a barrier to street connectivity which make places harder to move around. Provide safe, comfortable and convenient walking environments.</p>	<p>WCG agrees with the rationale that large blocks “can be a barrier”. Each development needs to be considered based on its unique location, topography, layout and land uses.</p>
<p><b>Proposal</b></p> <ul style="list-style-type: none"> <li>▪ No street blocks are to be longer than 200 metres.</li> <li>▪ Any block greater than 130 metres shall incorporate a mid-block pedestrian link.</li> </ul>	<p>WCG supports that street blocks do not exceed 200m in length.</p> <p>WCG does not support the wording that refers to “any block greater than [...]”; instead consideration of site-specific factors and limitations should be incorporated.</p> <p>Note that if a mid-block link is provided, the length of the street may be increased but not to more than 250m (as pedestrian connectivity is addressed by 130m dimension).</p>

Mandatory Elements	WCG Comments / Recommendations
<p><b>Provision 5</b>  <b>Have parks and open spaces within comfortable walking distance of every dwelling</b></p>	<p>WCG believe specific definitions, as well as measurable targets, need to be applied to terms such as ‘comfortable’. Without quantifiable terms, interpretation of the needs of the wider community may exclude of groups and individuals.</p> <p>WCG suggests ‘every dwelling’ is replaced with - 90% of dwellings within a designated distance (e.g. 800m) of a park or open space. Absolute statements need to be avoided.</p>
<p><b>Rationale</b>  Ensure neighbourhoods have open spaces that are sized, located and embellished to support the needs of their communities.</p>	<p>WCG agrees with the rationale of Provision 5.</p>
<p><b>Proposal</b></p>	<p>Local parks and their embellishments need to be further considered to ensure that the requirement of</p>

- Local recreation parks are provided at a maximum distance of 400 metres from the residents they serve (e.g. 5-minute walk).

the whole community is considered. Local parks with play equipment exclusively will not meet the evolving needs of the community.

In determining access to opportunities for walking and other healthy opportunities, linear and other recreational parks should also be considered.

## 2. How will the Proposals under this initiative will be implemented?

The consultation document refers to the five components being mandatory however the specific details of implementation are imperative to achieving real outcomes. Of note, the consultation document does not exemplify the performance-based planning approach that underpins the *Planning Act*.

WCG strongly urges the Queensland Government to provide details of the implementation strategy, and the opportunity to respond to the strategy, particularly how the proposal will inform and influence various planning schemes across the state.

## 3. Consultation process for the initiative and its relationship with the released Model Neighbourhood Code

WCG has serious concerns regarding the ability to properly and effectively engage with the community and broader industry across the State, based on the approach for the consultation of the Model Code for Neighbourhood Design. The Model Code for Neighbourhood Design and its release in July this year has had no effective input and consultation, which has ultimately limited the ability to comment on the broader issues that the Code implies. These issues are significant and include densities, lot design, open space provision, road types, service alignments and housing typologies, amongst others.

## Recommendations

WCG makes the following recommendations for consideration and incorporation into the Creating Healthy and Active Communities document, in summary of the above.

Mandatory requirements	WCG Recommendations
<p><b>Provision 1</b> The street network is based on a grid-like structure to encourage ease of movement and walkability</p>	<p>WCG recommends the introduction of provisions allowing for flexibility, dependent upon site-specific factors such as topographical, environmental and existing built form constraints.</p>
<p><b>Provision 2</b> Limit the use of cul-de-sac streets. Where cul-de-sac streets exist cul-de-sac heads allow through access for pedestrians and cyclists</p>	<p>WCG recommends the removal of an absolute maximum limiting the use of cul-de-sac streets, accommodating instead for site-specific factors as well as for the scale and type of housing product.</p>
<p><b>Provision 3</b> Have footpaths complemented by street trees on both sides of most street</p>	<p>WCG recommends that the requirement for street trees be associated with streets and not with footpaths and/or be required according to frontage width to allow for the provision of other required elements. Flexibility regarding placement is also required to allow development to occur on narrower lots.</p>
<p><b>Provision 4</b> Have blocks no longer than 130 metres with longer blocks having mid-block pedestrian links</p>	<p>Wording should be tempered to better reflect the rationale. WCG suggests the following wording: <i>“Blocks greater than 130m should consider pedestrian movement and connectivity which may result in the need for a mid-block link”.</i></p> <p>In addition, WCG recommends the incorporation of guidelines on mid-block links, particularly with regards to CPTED and equitable access. Achieving suitable outcomes for mid-block links may involve allowing their inclusion within the open space requirements (creditable).</p>
<p><b>Provision 5</b> Have parks and open spaces within comfortable walking distance of every dwelling</p>	<p>WCG recommends the inclusion of specifications about the required standard of service for local and other parks to ensure quality outcomes for open spaces, unless referring to the infrastructure plan for the relevant Council.</p> <p>WCG recommends requirements are introduced, where feasible, prescribing a maximum distance to other park types, including linear parks, which may provide for walking and other passive recreational opportunities and better meet the needs of the wider community.</p>

## Conclusion

In summary, whilst WCG supports this initiative and the rationales it includes, the value of the initiative has been significantly diminished through poor consultation practices and the prescriptive and absolute nature of the strategies.

WCG strongly requests the State Government to consider our suggestions on wording and to allow flexibility to accommodate for site- and development-specific conditions. We also request that the State Government facilitates a transparent approach to the code, its mandatory components and the implementation strategy. We also request further opportunities for broader commentary on residential communities that better reflect the changing nature of our demographics, ethnicity, values and needs moving forward.

Please do not hesitate to contact me should you have any queries or wish to discuss any of these matters further.

Yours sincerely,



Brad Jones

Director of Planning

**Wolter Consulting Group**