



## GREEN PAPER REVIEW – SUMMARY FEEDBACK TABLE

### Comment Sheet Information

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### Document Information

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**Conventions :**

Type of Comment		Assessment		Comment from author	
<b>G</b>	General	<b>CN</b>	Correction necessary	<b>R</b>	Rejected
<b>M</b>	Mistake	<b>CE</b>	Correction expected	<b>A</b>	Accepted
<b>U</b>	Understanding.	<b>+</b>	Major	<b>D</b>	Discussion necessary
<b>P</b>	Proposal	<b>-</b>	Minor	<b>NW</b> <b>C</b>	Noted without need to change

**Review Comments (if necessary add extra lines in the table):**

N°	Reference (e.g. Page, Reference, Appendix)	Comment from Reviewer	Reviewer's Comments, Questions, Proposals (by Strategic Planning)
<p>The City of Kalamunda appreciates the opportunity to comment on the Green Paper.</p> <p>The City supports majority of the recommendations and initiatives and agrees that some changes will need to be made to improve the fairness, transparency, integrity and efficiency of the Western Australian planning system. Further to the comments provided by the Western Australian Local Government Association, the City has identified a number of relevant points for further consider.</p> <p>Each key reform section is coded with the related colour and points for discussion are highlighted grey for your convenience.</p> <p>Recommendations not included are noted or accepted without need to change.</p>			
<p><b>A STRATEGICALLY LED SYSTEM</b></p>			
1.	<p><b>1.2.1</b> <i>An overarching State Planning Policy be developed which:</i></p> <ul style="list-style-type: none"> <li><i>i. Provides a definition of sustainability for the planning system which reflects a balancing of economic development, environmental considerations, and social needs;</i></li> <li><i>ii. Reinforces sustainability as an essential element required to be taken into account in the making of any strategy or policy; and</i></li> <li><i>iii. Indicates the particular steps related to how economic, social and environmental factors are balanced.</i></li> </ul>	<b>D</b>	<p>Conditionally Supported.</p> <p>The term 'sustainability' will need to be carefully defined as it does not just include benefit for humans and development. What is of long term benefit for urban planning may not necessarily be sustainable for the environment, or social development.</p> <p>It is suggested a hierarchy of emphasis be placed as:</p> <ol style="list-style-type: none"> <li>1. Environment</li> <li>2. Social</li> <li>3. Economic</li> </ol> <p>Where the environmental and social benefits are considered a priority above short-term economic benefit. The definition should also consider the full short-term and long-term implications, ongoing management, lifecycle and demolition of a development to be holistically sustainable.</p>
2.	<p><b>1.3.1</b> <i>Provide that every local planning strategy include a local housing strategy, except for low growth and small regional local governments which only require basic local planning scheme requirements.</i></p>	<b>D</b>	<p>Supported.</p> <p>The WAPC Local Planning Manual already requires housing to be addressed and is an integral part of long term planning for local government, the City agrees it should be reviewed and concessions or a consolidated checklist made for smaller regional local governments.</p>
3.	<p><b>1.3.2</b> <i>The DPLH to provide guidance for local government in the Local Planning Manual on how to prepare a Local Housing Strategy, including a methodology for local housing analysis.</i></p>	<b>D</b>	<p>Supported.</p> <p>A guide for preparing the Local Housing Strategy would be helpful and provide greater consistency in analysis of data across metro Local Governments.</p>

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A LEGIBLE PLANNING SYSTEM			
4.	2.2.1 <i>State Planning Policies be consolidated into a single state planning policy framework with supplementary technical guidance.</i>	<b>D</b>	<p>Supported.</p> <p>Consolidating State Planning Policies and ensuring they have direct translation into the Local Planning Scheme is supported. If State policies included recommended actions for local government authorities when applying the policy, this would make it easier to translate to conditions of development approval or incorporate into local scheme provisions or policy.</p>
5.	2.4.1 <i>Require that a local planning scheme be published with the inclusion of the local planning strategy (in the form of a local strategic statement) and local planning policies in a document to be called a "Comprehensive Local Planning Scheme".</i>	<b>D</b>	<p>Partially Supported.</p> <p>Incorporation of the Local Planning Strategy into the scheme is supported. A comprehensive Local Planning Scheme will draw decisions back to a strategic focus. It will also assist with giving reasons for statutory decision making as it relates back to strategic objectives.</p> <p>Incorporating Local Planning Policies (LPPs) as part of the Scheme is not supported. One of the benefits of an LPP is how quickly they can be introduced, amended or updated as opposed to a Scheme Amendment. It would be good to include them as an appendix of the Scheme as opposed to a provision. Page 29 of the review suggests LPP's will be reviewed by DPLH and approved by the Minister. The City and WALGA considers this "micro-management" and detracts from the strategically led state vision (2.4.1).</p> <p>Recently this was experienced when Scheme Amendment 82 and the City of Kalamunda Dual Density Local Planning Policy was approved by the Minister. Prior to referring to the Minister the WAPC were given an opportunity to comment and declined. After the Ministers decision was gazetted the WAPC requested to review the policy.</p> <p>Since then the policy has been pending endorsement from the WAPC, and in some cases conditions relating to the recently adopted amendment have not been consistently applied to subdivision approvals. This is resulting inconsistent planning decisions and uncertainty as to whether the policy will be upheld.</p> <p>The State Government should maintain a higher level visionary role, rather than prescriptive, and it is queried whether the WAPC has the necessary resources to review policies within a reasonable timeframe. The City agrees that the role of State Government is to check form and manner (layout) is consistent, and ensure the intent is consistent with state objectives, rather than managing content. LPPs are developed based on specific local context and experiences which may not be relatable at a state level.</p> <p>Furthermore, strategic planning at the local level should always be linked to Council's Strategic Community Plan. This principle should be acknowledged in State planning framework.</p>
6.	2.4.2 <i>DPLH to provide guidance for local government in the Local Planning Manual on the content and format of a local planning strategy and local planning policies.</i>	<b>D</b>	<p>Partially Supported.</p> <p>As per 2.4.1 above. Agreed that the form and manner should be consistent, however content should be developed by local government.</p>
7.	2.4.3 <i>Local governments currently undertaking, or about to embark on, a substantive review of their planning frameworks delay preparation of local planning strategies and local planning schemes (and related omnibus amendments) until guidance on the format and content of local planning frameworks is available.</i>	<b>D</b>	<p>Not supported.</p> <p>Pending applications is not practical as there is no definitive timeline for the review and adoption of the white paper. It is suggested that further to the adoption of the white paper each local government then comprehensively review their framework to ensure consistency and provide a report to the DPLH outlining which actions have been taken.</p>

N°	Reference (e.g. Page, Reference, Appendix)	Comment from Reviewer	Reviewer's Comments, Questions, Proposals (by Strategic Planning)
8.	2.6.1 <i>The LPS Regulations be amended to provide that local planning policies are to be prepared in a manner and form approved by the WAPC.</i>	NWC	As per 2.4.1 and 2.4.2 above.
9.	2.6.2 <i>The DPLH to update the Local Planning Manual to provide guidance for the form, content and writing of a local planning policy.</i>	D	Partially Supported.  See point 2.4.1. The City supports having a layout guideline for LPPs. Layout should be consistent, objectives should be consistent with state planning policy and strategies, but content should be the jurisdiction of local government.  The City does not support the State dictating the content of a LPP, only the form and manner. Often changing the content results in 'diluted' outcomes which does not solve the original conflict and may be more difficult to implement.
10.	2.7.2 <i>Provide in the LPS Regulations that a comprehensive local planning scheme is to include a specific section for deemed provisions.</i>	D	Supported.  Already addressed in the City omnibus deemed provisions amendment Scheme Amendment 83. The amendment was adopted by Council in Dec 2017 and referred to the Commission on 12 January 2018.
11.	2.7.3 <i>Provide in the LPS Regulations that there are deemed provisions which set out standardised zones, land uses and land use permissibility which:</i>  <i>i. group like-land uses into themes for which common development standards can be prepared;</i>  <i>ii. identify low risk land use proposals by including suitable parameters for which a streamlined planning process apply; and</i>  <i>iii. are mandatory for local government to adapt within their municipalities through the next scheme review or omnibus amendment.</i>	D	Supported.  Standardisation of zones, land uses, and land permissibility apply in Perth and major regional centres is supported.  Consistency would streamline development approvals and provide greater certainty. In some areas the land permissibility may change depending on local government area, for example places of worship, chalets, tourism developments may require greater discretion, and consideration of culture and location.  Standardisation of zones is good where it can be achieved. The City suggests land uses be increased within the zones, so the number of zones can be reduced.  One of the examples are the various zones for Rural areas which are inconsistent across local governments. This leads to difficulties for the general public to understand the differences between the various Rural zones.
12.	2.9.1 <i>Develop an interactive 'Planning Portal' for keeping local planning schemes online and accessing them in a legible and user-friendly format.</i>	D	Supported.  This should be standard across all Local Governments.
TRANSPARENT PLANNING SYSTEM			
13.	3.2.1 <i>The DPLH should develop a Community Engagement Charter for all aspects of the planning system that includes principles with regard to:</i>  <i>i Planning authorities having a duty to engage with the community in a manner that allows residents to contribute to the making or amending of a strategic plan; and</i>  <i>ii In the making or amending of a strategic plan, the community, as soon as possible, be given information as to what is proposed and any documents that the planning authority intends to examine.</i>	D	Supported.  In most cases the City goes above and beyond in community engagement so this is not deemed a significant change to current practices.

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14.	3.3.1 <i>The DLPH to publish a Guide as to the Scope of Reasons by Planning Decision Makers, having regard to the Queensland model.</i>	<b>D</b>	Supported.  A guide may be helpful to reference reasons for refusal or approval. Providing reasons for decisions is something the City already does, particularly with refusals. Where a submitter has objected and the application has been approved, the City will send a notification letter and highlight the relevant condition which addresses their concerns.
15.	3.5.1 <i>Provide in regulations mandatory reporting by local government on planning matters.</i>	<b>D</b>	Conditionally Supported.  Agreed there should be a high level of efficiency and service in the planning system, however it is recommended that ratings are not based on number of approvals and refusals because it may cause undue political pressure to change determinations for better ratings, when it is not necessarily resulting in a better outcome for the community.  It should also be considered that planning as a profession is more of a regulatory role than a service provision role, and therefore customer satisfaction may be skewed based on the political atmosphere and/or decision.  It is suggested ratings be based on areas such as: <ul style="list-style-type: none"> <li>• Manner of customer service</li> <li>• Ease of access to information and resources</li> <li>• Promptness and consistency of communication</li> <li>• Online tracking of applications</li> <li>• Access to professional planning advice</li> <li>• Whether statutory timelines are consistently met</li> <li>• Satisfaction in community engagement</li> </ul>
16.	3.6.5 <i>Provide for a requirement that applications amended through a SAT process are readvertised unless the amended plans comply with all development standards.</i>	<b>D</b>	Supported.  Longer deputations are supported in more complex cases. This will assist in making a more informed decision.  A definition of a significant change needs to be clearly defined.  Preparation of prescriptive criteria, to determine what is a significant amendment and what is not, will be required for plans which are amended through mediation and re-advertised. It is worth considering that re-advertising may be inflammatory for contentious proposals. The inclusion of third party deputations in SAT mediation (See 3.6.7) is supported and may mitigate the need for re-advertising, provided deputations are based on planning merit.
17.	3.6.7 <i>The SAT should consider preparing a framework for allowing parties with a sufficient interest in a matter to make a submission or be heard during SAT mediation of DAP matters.</i>	<b>A</b>	As per 3.6.5.
EFFICIENT PLANNING SYSTEM			
18.	4.1.2 <i>Provide for a local government accreditation process.</i>	<b>D</b>	Conditionally supported.  The City is not adverse to an accreditation system for subdivision referrals however seeks clarification on the following points: <ol style="list-style-type: none"> <li>1. What is the process to gain accreditation?</li> <li>2. Who receives the subdivision application fees?</li> <li>3. Can there be shared accreditation for subdivision referrals where resourcing for smaller councils may be restrictive? I.e. can one local government assess and determine applications for another?</li> </ol>

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			<p>4. If shared accreditation is possible and a local government that has accreditation deals with the subdivision, who receives the fees?</p> <p>5. What if a local government fails accreditation?</p> <p>6. What is the incentive for accreditation for Local Government? The City would want to avoid a situation of responsibility or cost shifting.</p>
19.	<p><i>4.1.3 Increase delegations from WAPC to DPLH and local government, for the purpose of the WAPC focussing on the State policy framework and regional strategic planning.</i></p>	<b>D</b>	<p>Conditionally supported.</p> <p>Delegated authority to local government for basic subdivision approvals is conditionally supported.</p> <p>The City anticipates the workload will be the same as applications are already referred for comment, though currently it is occurring without fees. Delegation for basic subdivisions will also provide faster determinations which is beneficial for the community. Clarification on receiving subdivision fees and resourcing impacts is required.</p>
20.	<p><i>4.1.8 The DPLH and WAPC establish a protocol for the engagement of non-public sector expertise in the scoping and development of policies.</i></p>	<b>D</b>	<p>Conditionally Supported.</p> <p>The City agrees technical expertise from non-government authorities will be helpful. It is suggested that policy development maintains a strategic ethos and the WAPC and DPLH maintain a visionary role, advocating for innovation and better liveability as opposed to outlining minimum standards.</p>
21.	<p><i>4.2.2 A framework for referral of planning applications to be incorporated in regulations as appropriate.</i></p>	<b>D</b>	<p>Conditionally Supported.</p> <p>The City suggests following a concept similar to Queensland where an interactive online map is developed which gives all information about the property (like Intramaps) but also includes alerts for when a referral to an external agency is required. This provides greater efficiency, certainty for the applicant, and may assist with consistency for referrals from local government authorities.</p> <p>Additionally, it is recommended a comprehensive referral list be incorporated in the LPS Regulations, providing a consolidated document which outlines when and why referrals are required, as opposed to having them scattered throughout individual policies, information sheets, regulations or legislation.</p>
22.	<p><i>4.2.4 Provide in regulation that an applicant may seek pre-lodgement advice for development applications.</i></p>	<b>D</b>	<p>Supported.</p> <p>The City supports pre-lodgement advice and currently offers voluntary formal written planning advice for a minor fee of \$73.00. The City officers also have a rotational roster as 'Duty Planner' whereby a planner is always available to give technical planning advice and assist with lodgement of applications.</p> <p>As the planning system is currently very convoluted, the opportunity to get preliminary planning advice is difficult with uncertain outcomes and many reference documents. Allowing officers time to research the application and relevant documentation beforehand is imperative to giving accurate and helpful pre-lodgement advice.</p>
23.	<p><i>4.2.6 Provide in the LPS Regulations that a local government must advise an applicant within 10 business days of receipt of a development application whether additional information is required.</i></p>	<b>D</b>	<p>Conditionally supported.</p> <p>The City agrees officers should promptly request additional information after an initial assessment within a reasonable timeframe, however providing a statutory limit may be too restrictive.</p> <p>Currently at the City there is an informal assessment timeline in place where applications are taken to a Development Control Unit (DCU) meeting where a representative from engineering, health, parks and environment, and planning are present to request internal referrals. Further to DCU the application is determined to be fast-track, standard or complex. Within a few days of DCU the application is assessed and acknowledgement letter sent, with a request for</p>

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			<p>any further information required.</p> <p>Where an application complies but is not exempt from approval under the scheme it can be fast tracked within a few weeks. Where an application is standard it is advertised and determined within 60 days. Where an application is complex advertising occurs and reports for Council, Design Advisory Committee, or JDAP are generally prepared within 90 days.</p> <p>Once applications are referred to internal and external agencies occasionally further information or amendments are required and the applicant is notified.</p> <p>It is believed the 10 day limit is a fair and transparent process for the applicant, however it may restrict the ability to request more information further to receiving internal referral advice, external referral advice, further to receiving amended plans or even where clarification is required for Council reports. It is recommended the 10 day limit be a guide rather than a statutory limit.</p>
24.	<p>4.2.8 Provide in the PD Act that the implementation section (part one) of approved structure plans and activity centre plans are to be read as part of the scheme and have the "force and effect" of the scheme.</p>	<b>D</b>	<p>Supported.</p> <p>Having due regard to structure plans makes it easier to make minor adjustments without a full scheme amendment, however also gives them less validity and therefore more easily challenged.</p> <p>Reading structure plans as part the scheme will provide clarity and certainty, with additional statutory weight where plans outlines provisions which vary the requirements of the residential design codes.</p> <p>Part 6.2.7.2 (a) of the City of Kalamunda Local Planning Scheme states "the provisions of a Structure Plan apply to the land as if its provisions were incorporated into the scheme and it is binding and enforceable in the same way as corresponding provisions incorporated into the scheme" so this would have little bearing on the way structure plans are read in the City.</p> <p>A checklist outlining which aspects should be included in a structure plan would also provide greater consistency between local governments. It would also prevent adoption of structure plans with missing information such as zones, or variations to the R-Codes.</p> <p>For example; Canning Location 311 Structure plan adopted 2014 notes building envelopes and lot size but no applicable R-Code so assessing subdivision potential is difficult.</p>
25.	<p>4.2.10 Provide for development contribution plan cost and cost contributions schedules to be included as a schedule in local planning schemes.</p>	<b>A</b>	<p>Supported.</p> <p>Development contributions are already incorporated into the City of Kalamunda's Local Planning Scheme as Schedule 11 &amp; 12.</p>
26.	<p>4.2.13 Provide in the LPS Regulations for a voluntary 'deemed-to-comply' check for single houses and provide in the PD Regulations a specified fee for the service.</p>	<b>A</b>	<p>Supported.</p> <p>See point 4.2.4. The City offers voluntary formal preliminary planning advice for a \$73.00 fee for more complex proposals.</p>
27.	<p>4.2.14 Provide in the LPS Regulations and R-Codes a fast-track 30-day planning approval process for single house applications that require only minor variations to the R-Codes.</p>	<b>D</b>	<p>Conditionally Supported.</p> <p>In addition to point 4.2.6 The City agrees that applications with only minor variations may be fast-tracked however seeks clarification on the following aspects:</p> <ol style="list-style-type: none"> <li>1. It is anticipated fast-track processes are already undertaken by authorities with sufficient resourcing, would</li> </ol>

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			<p>this put unnecessary pressure on smaller councils unable to address this already?</p> <ol style="list-style-type: none"> <li>2. Can a list of minor variations be included?</li> <li>3. Does the fast-track of applications with minor variations cause an expectation for approval where they are deemed not to comply? Would this not undermine the deemed-to-comply aspect of the Residential Design Codes?</li> <li>4. Would the 30 days include advertising to neighbours, which can take approximately three weeks?</li> <li>5. Should local governments have discretion to approve minor variations without referral to neighbours?</li> <li>6. The City instead suggests a fast-track, standard or complex planning approval process with delegated timelines (see 4.2.6).</li> </ol> <p>The City is currently developing a list of structures with minor variations which may be exempt from approval. For example; patios behind the primary street setback with a 500mm side setback, or outbuildings in residential zones which comply with P-DEV20 Outbuildings and Sea Containers Local Planning Policy. This would exempt structures with minor variations from approval altogether, saving time for planning officers and cost to the applicant.</p>
PLANNING FOR SMART GROWTH			
28.	<p><i>5.3.1 The WAPC to assist with land use and infrastructure coordination for the delivery of priority precincts through a renewed Committee.</i></p>	<b>A</b>	See point 5.5.1 below.
29.	<p><i>5.4.1 Provide in the Metropolitan Region Scheme an "Industrial Deferred Zone".</i></p>	<b>D</b>	<p>Supported.</p> <p>Incorporation of an 'Industrial Deferred' zone under the MRS is supported. Acceptable interim land uses should be developed and applied. Is this something that can be addressed through deemed provisions and standardisation of zones in the Local Planning Scheme?</p> <p>The City's LPS3 contains an 'Industrial Development' zone which is applied in the interim between rezoning and adoption of a structure plan. Permitted land uses are generally consistent with 'light industry' type uses, compatible with transitioning residential properties.</p>
30.	<p><i>5.5.1 Provision be made for advice on the forward planning of State infrastructure, including utility providers, to assist local governments in the preparation of local planning strategies and structure plans.</i></p>	<b>D</b>	<p>Conditionally Supported.</p> <p>There is some difficulty in implementation with longer timelines, is 10 year capital expenditure plan realistic where there are so many unconfirmed variables?</p> <p>Delivery should be limited to key pieces of infrastructure including:</p> <ul style="list-style-type: none"> <li>• Sewer</li> <li>• Regional roads</li> <li>• Rail</li> </ul> <p>Development Contribution Plans (DCP's) already provide for the pre-funding of infrastructure items. It would be useful if a DCP infrastructure fund could be established, where local government can loan money from the fund at discounted interest rates to fund infrastructure delivery and open up areas for development. The fund could be overseen by the Infrastructure Coordination Committee.</p> <p>Additionally, it is recommended a DCP panel be set up to mediate and assist with disputes between local government and landowners.</p> <p>If a DCP fund is not created changes to the Local Government Regulations need to be made so that debt ratios for local government are not affected where loans are taken out from other financial institutions for delivery of essential infrastructure within a DCP area.</p>

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31.	<p><i>5.6.1 The Metropolitan Region Scheme be updated to include "Urban Corridor" as a category of Reserved Roads based on Perth and Peel @ 3.5 Million, with the Department of Transport being made responsible for coordinating a whole of transport portfolio response to planning proposals along the corridor.</i></p>	<b>D</b>	<p>Supported.</p> <p>The definition of urban corridor requires clarification.</p> <ol style="list-style-type: none"> <li>1. Are these existing urban corridors such as Beaufort Street, or Northridge where it's highly activated, or is this to identify areas for higher density? If the latter it is suggested higher density located around areas accessible only by road are avoided, because it creates dependency on vehicles.</li> <li>2. How is Urban Corridor defined?</li> <li>3. What sort of land uses should it encompass?</li> <li>4. How does it relate to Activity Corridors in Directions 2031 and Beyond?</li> </ol> <p>It is anticipated that district distributors and other regional roads (Main Roads – red road, blue road) need greater flexibility for access through Activity Centres.</p> <p>The City suggests that there could be a split in the road category and where a red road has an urban corridor, the area that's urban corridor could be referred to the WAPC/DPLH for consideration as opposed to Main Roads.</p> <p>For example; Kalamunda Road could have some sections identified as an urban corridor where adjacent to commercial activity centres.</p>
32.	<p><i>5.71 Liveable Neighbourhoods be elevated to a State Planning Policy and maintained and refined as a best-practice approach to new greenfields development at regional, district and local level.</i></p>	<b>D</b>	<p>Expected.</p> <p>When considering adopting Liveable Neighbourhoods as a State Planning Policy it would be helpful to include actions or recommendations for implementation. For example; bioswales or filtering of storm water runoff through landscaped areas is encouraged for water sensitive urban design, however in which circumstances should this be required?</p> <p>Experience with previous applications has also identified that there are some road traffic engineering references in Liveable Neighbours which are frequently used but have little statutory bearing.</p> <p>For example; Element 2 – movement network includes intersectional spacing for roads with low speeds and low traffic volume. Liveable Neighbourhoods therefore supplements Ausroad guidelines which provides greater details for roads with speeds of more than 50km/hr.</p>