

WALKING PLAN

Analysis of pedestrian-related provisions in the Melbourne Planning Scheme

Purpose

The purpose of this analysis is to identify what the Melbourne Planning Scheme (MPS) currently achieves for pedestrians, where it falls short and what potential there is to change it to deliver better pedestrian outcomes.

The analysis is based on a number of issues for pedestrian planning that have been identified through preliminary work done by the Transport Planning team and internal meetings (141112 and 271112) involving Strategic Planning and Development Planning (refer below). It is recognised that the MPS is potentially not the place to solve all of these pedestrian issues.

Pedestrian issues

The identified pedestrian issues are as follows (refer Table A for greater detail):

- 1. Crossovers
- 2. Waste collection
- 3. Car parking volume
- 4. Missing footpaths
- 5. Accessibility
- 6. Weather protection
- 7. Sunlight to streets
- 8. Wind impacts
- 9. Active frontages at ground level
- 10. Passive surveillance at upper levels
- 11. Footpath trading
- 12. Public Acquisition Overlays
- 13. Shared access zones
- 14. Through-block links
- 15. Pedestrian generation rates
- 16. Land use mix

Summary of findings

The following provides a summary of the detailed analysis presented in Table A in terms of how the identified pedestrian issues are addressed by the MPS or Planning Scheme Amendments (PSAs) and recommendations to deliver better pedestrian outcomes.

MPS COVERAGE

ZERO	MEDIUM	HIGH
 5. Accessibility (addressed via BCA rather than the MPS) 11. Footpath trading (addressed via local law rather than the MPS) 13. Shared access zones (refer 13. Throughblock links) 15. Pedestrian generation rates 	 3. Car parking volume 8. Wind impacts 10. Passive surveillance at upper levels 12. Public Acquisition Overlays 14. Through-block links 	 Crossovers Waste collection Missing footpaths Weather protection Sunlight to footpaths Active frontages at ground Land Use mix
Recommendations	Recommendations	Recommendations
 10. Pedestrian generation rates Identify key pedestrian streets with poor level of service (which will be exacerbated by new development) and consider one or both of the following: A mechanism to seek engineering input / advice for large developments on identified key problem streets A PSA to apply level of service requirements / pedestrian generation rates for identified key problem streets and possible mitigation actions for developers 	 3. Car parking volume Scope to review uneven application but not key issue for Walking plan 8. Wind protection Education to ensure greater analysis / interrogation of the submitted wind reports 10. Passive surveillance at upper levels Consider extending existing (22.25) and proposed provisions (C171, C196) 12. Public Acquisition Overlays Review PAO5 and PAO6 to update where widening via acquisition still relevant 14. Through-block links Additional research re ideal permeability, appropriate definitions and mechanisms 	No specific actions recommended for MPS; however, the following is highlighted: 7. Sunlight to footpaths Resolve conflict between weather protection and sunlight penetration policies noting site constraints 9. Active frontages at ground Potential to expand and shore up our understanding of what constitutes an active frontage

TABLE A

Detailed analysis of pedestrian-related provisions in the MPS / PSA

The MSS (current and adopted) includes objectives and strategies supporting pedestrians including priority, quality and permeability. This analysis has concentrated on detailed provisions in the local planning policies, zones and overlays. The recommendations have been discussed with representatives from Development Planning.

Issue	MPS / PSA	Comments and recommendations
1. Crossovers The frequency, size and design of vehicle crossovers has a significant affect on pedestrian comfort. Issues include sightlines, width, frequency, levels, signalisation, car entry treatments (boom gates etc). Are the current provisions working? Where do they apply? Should they be applied to other areas? (Richard Smithers)	 Local planning policies - Urban Design within the CCZ (22.01), outside the CCZ (22.17), Docklands Zone (22.18) and Fishermans Bend (22.25) include general policy relating minimising disruption between vehicular access and pedestrian movements CCZ decision guidelines - includes reference to the 'movement of pedestrians and cyclists, and vehicles providing for supplies, waste removal, emergency services and public transport'. DDO3 – Traffic conflict frontage – CCZ (refer http://planningschemes.dpcd.vic.gov.au/melbourne/ordin ance/43_02s03_melb.pdf) Applies to only selected streets in the CCZ (refer http://planningschemes.dpcd.vic.gov.au/melbourn e/maps/melbourne08ddo3.pdf) Design objectives concentrating on pedestrian flow, safety and amenity Requirements provide discretionary crossover controls on a traffic conflict frontage and mandatory crossover controls on a traffic conflict frontage and mandatory crossover controls on a traffic conflict frontage within CCZ2 	 Local planning policies / 55 / GHDRD recognise the issue of crossovers on pedestrian movements and provide an opportunity for planners to negotiate an outcome to limit number and size. Limited application of DDO3 which sets out discretionary and mandatory controls. For instance, DDO3 does not apply to Southbank, Docklands and proposed URAs. Where crossovers are approved, permit conditions can be included to deal with size and design such as provision of pedestrian refuge. Recommendations Assess whether the combination of existing provisions has been effective. If not, extend DDO3 based on a study identifying additional traffic conflict frontages. Based on statutory planning experience / discussions, the existing combination is effective to limit the number of crossovers and permit conditions adequately deal with size and design.

Issue	MPS / PSA	Comments and recommendations
	Particular provisions – two or more dwellings (55) includes objectives and standard relating to accessways	
	Guidelines for Higher Density Residential Development (GHDRD) (15) – includes guidelines relating to car park entries	
	C171 (Southbank) – proposed changes to DDO1 maps include additional Southbank streets in DDO1 (Area 2)	
	C196 (City North) – proposed DDO61 includes design objectives and requirements relating to active and safe street frontages	Υ.
	 Planning permit conditions / notes are recommended by ESG on a case-by-case basis such as: All necessary vehicle crossings adjacent to the subject land must be constructed and all unnecessary vehicle crossings demolished in accordance with plans and specifications first approved by the Responsible Authority – Engineering Services. The maximum permissible width of a vehicle crossover without a pedestrian refuge is 7.6 metres. Crossings wider than 7.6 metres should include pedestrian refuges a minimum of 2.0 metres in length at 7.6 metre maximum clear spacings. The width of an abutting laneway entrance should be deemed to be included in the crossing width unless a 2.0 metre long pedestrian refuge is provided between the laneway entrance and the crossing. 	

Issue	MPS / PSA	Comments and recommendations
2. Waste collection	BZ / CCZ / DZ application requirements or decision guidelines - includes reference to vehicle loading areas including rubbish storage and removal GHDRD (15) – includes guidelines relating to rubbish including preparation of a Waste Management Plan	 Zones / GHDRD recognise the need to consider waste collection and provide an opportunity for planners to negotiate an outcome requiring on-site collection resulting in reduced impact on pedestrians. Permit conditions can be included to deal with
	 GHDRD (15) – includes guidelines relating to rubbish including preparation of a Waste Management Plan (WMP) WMP is a common submission requirement for medium / large developments and is referred to ESG for review. To assist developers, ESG have produced <i>City of Melbourne Guidelines for Preparing a Waste Management Plan.</i> ESG recommend conditions on a case-by-case basis such as: All garbage and other waste material must be stored in an area set aside for such purpose to the satisfaction of the Responsible Authority. No garbage bin or waste materials generated by the permitted use may be deposited or stored outside the site and bins must be returned to the garbage storage area as soon as practical after garbage collection, to the satisfaction of the Responsible Authority - Engineering Services. The waste storage and collection arrangements 	 pedestrians. Permit conditions can be included to deal with waste collection. Recommendations Assess whether the combination of existing provisions / ESG guidelines and conditions has been effective. Based on statutory planning experience, the existing combination is effective to manage waste collection including requiring on-site collection for medium / large developments.
	 must be to the satisfaction of the Responsible Authority - Engineering Services. Prior to the commencement of the use and/or development, a Waste Management Plan (WMP) shall be prepared and submitted to the City of Melbourne - Engineering Services. The WMP should detail waste storage and collection arrangements and be prepared with reference to 	

Issue	MPS / PSA	Comments and recommendations
	the City of Melbourne Guidelines for Preparing a Waste Management Plan. Waste storage and collection arrangements must not be altered without prior consent of the City of Melbourne - Engineering Services.	
3. Car parking volume Is there anything in the scheme which relates the provision of lots of car parking to making the pedestrian environment worse because there are more cars in nearby streets? (Richard Smithers)	Car parking minimisation provisions exist for CCZ, DZ and, for dwellings only, parts of Carlton, North Melbourne, East Melbourne and Southbank in the form of an Incorporated Parking Precinct Plan. In addition, PO13 applies to the FBURA.	 Car parking minimisation provisions exist for CCZ, DZ, FBURA and parts of Carlton, North Melbourne, East Melbourne and Southbank. These provisions would result in reduced traffic in nearby streets. The Incorporated Parking Precinct Plan for parts of Carlton, North Melbourne, East Melbourne and Southbank relates only to dwellings. There are no similar controls currently proposed for Arden-Macaulay.
		 Recommendations Car parking minimisation provisions are effective but apply unevenly. Consider expanding relevant uses in the Incorporated Parking Precinct Plan (or via PO) for parts of Carlton, North Melbourne, East Melbourne and Southbank. Consider expanding the Incorporated Parking Precinct Plan (or via PO) to Arden-Macaulay. Agreement at meeting 271112 that this is not a key issue for the Walking plan.
4. Missing footpaths There are parts of the municipality where footpaths do not exist. Is the planning scheme a useful tool for	CCZ application requirement – includes requirement for upgrading adjacent footpaths or laneways Planning permit conditions are recommended by ESG on a case-by-case basis such as:	• Where developments are approved adjacent to missing footpaths, ESG can recommend permit conditions to be included to require reconstruction. There are limited locations where footpaths are missing.

Issue	MPS / PSA	Comments and recommendations
ensuring that footpaths are built in the future when development occurs? (Richard Smithers)	 The footways and/or kerb and channel (Specify material and standards) in NAME STREETS which are adjacent to the subject land must be reconstructed /upgraded/replaced in accordance with plans and specifications first approved by the Responsible Authority – Engineering Services. DCPO1 for FBURA will presumably deal with missing footpaths (due for completion June 2013) DCP for URAs (due to go to Council April 2013) – includes fully costed upgrades for all streets in Southbank, City North and Arden-Macaulay. This would therefore deal with any missing footpaths (if any?). 	 Proposed DCP for URAs includes upgrades to all streets. Recommendations Assess whether the development-based response has been effective noting that DCPs will soon apply to URAs. Based on statutory planning experience / discussion, the existing response is effective given the limited locations where footpaths are missing.
5. Accessibility	 BCA issue rather than MPS which can be reinforced on a case-by-case basis with the addition of the following planning permit: Provision must be made for disabled access into the building in accordance with the Disability (Access to Premises-Buildings) Standards 2010, to the satisfaction of the Responsible Authority. 	BCA issue rather than MPS
6. Weather protection What does the planning scheme say about awnings etc? Could it be changed to require awnings if necessary? (Richard Smithers)	Local planning policies - Urban Design within the CCZ (22.01), outside the CCZ (22.17) and Fishermans Bend (22.25) include general policy relating to weather protection. Urban Design within the Docklands Zone (22.18) is not as explicit in terms of weather protection. CCZ – decision guidelines include reference to verandahs DDO4 – Weather protection – CCZ (refer	 Local planning policies recognise the issue of pedestrian comfort in terms of weather protection Limited application of DDO4 which sets out mandatory controls (unless demonstrated to RA satisfaction). DDO4 does not apply to Docklands and proposed URAs. C190 and C196 propose weather protection provisions.

Issue	MPS / PSA	Comments and recommendations
	 <u>http://planningschemes.dpcd.vic.gov.au/melbourne/ordin</u> <u>ance/43_02s04_melb.pdf</u>) Applies to only selected streets in the CCZ (refer <u>http://planningschemes.dpcd.vic.gov.au/melbourn</u> <u>e/maps/melbourne08ddo4.pdf</u>) Design objectives concentrating on pedestrian amenity in terms of protection Requirements provide mandatory controls (unless demonstrated to RA sat) for a verandah on a building with a road frontage marked weather protection C190 (Arden-Macaulay) – proposed DDO60 includes design objectives and requirements relating to weather protection C196 (City North) – proposed DDO61 includes design objectives and requirements relating to weather protection 	 Recommendations Assess whether the combination of existing provisions has been effective (noting C190 / C196). If not, extend DDO4 based on a study identifying additional road frontage marked weather protection. Based on statutory planning experience / discussions, the existing combination is effective noting that there are many examples when weather protection is not possible due to urban design / clearance requirements. Urban design policies arguably more effective than DDO4 as they provide a need for a blanket consideration.
7. Sunlight to footpaths	Local planning policies – Sunlight to Public Spaces (22.02) includes policy relating to new buildings and works allowing good sun penetration to public spaces including streets and lanes. It applies to all areas apart from DZ.	 Local planning policies recognise the importance of sun penetration to public spaces including streets and lanes. However, in terms of footpaths, this policy can conflict with policy requiring weather protection (refer above). In addition, the existing street pattern will in some cases (for example, the Hoddle grid) impact the ability to allow for sunlight to footpaths. Recommendations Due to conflict between weather protection and sunlight penetration, need to assess which is more important for pedestrian comfort noting site

Issue	MPS / PSA	Comments and recommendations
		 constraints. Based on statutory planning experience, weather protection appears to out-rank sunlight to footpaths in planning decisions. If this is not the preferred outcome, consider amendments to the MPS.
8. Wind What does the planning scheme say about wind impacts? (Richard Smithers)	 Local planning policies - Urban Design within the CCZ (22.01), outside the CCZ (22.17), Docklands Zone (22.18) and Fishermans Bend (22.25) include general policy relating to wind CCZ / DZ – decision guidelines include reference to wind GHDRD (15) – includes guidelines relating to wind protection C171 (Southbank) - proposed CCZ3 includes application 	 Local planning policies / GHDRD recognise the issue of pedestrian comfort in terms of wind. C171 (Southbank) seeks to take the matter further by specifying criteria for DDO1 – Active Street frontages (stationary long term) and other streets (short term wind). Recommendations Assess whether the existing provisions have been effective (noting changes proposed by C171). Based on statutory planning experience / discussions, the existing is effective as wind
	 requirement for Wind Analysis and criteria for streets C190 (Arden-Macaulay) – proposed DDO60 includes only general design objectives C196 (City North) – proposed DDO61 includes design objectives and requirements relating to wind Wind effects statement / wind tunnel testing is a common submission requirement for medium / large developments Planning permit conditions are included on a case-by- case basis such as: Prior to the commencement of the development 	effects statements / wind tunnel testing are common inputs / permit conditions for large developments that have most impact in terms of wind. Improvements could be made through education to ensure greater analysis / interrogation of the submitted reports such as wind impacts at key pedestrian crossings where stationary wind conditions are required.

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	(excluding any demolition, bulk excavation, construction or carrying out of works (specify all or any of these to be consistent with any condition 1 requirement)), wind tests carried out by a suitably qualified consultant, must be carried out on a model of the approved building. A report detailing the outcome of the testing must be submitted to and be to the satisfaction of the Responsible Authority. The report must also recommend any modifications which must be made to the design of the building to reduce any adverse wind conditions in areas used by pedestrians, to the satisfaction of the Responsible Authority. The recommendations of the report must be implemented at no cost to the Responsible Authority and must not include reliance on street trees.	
9. Active frontages Active frontages are important for creating an interesting pedestrian environment which will attract walking. What does the scheme say about active frontages? Where does this apply? Could/should it be broadened to other areas? (Richard Smithers)	 Local planning policies - Urban Design within the CCZ (22.01), outside the CCZ (22.17), Docklands Zone (22.18) and Fishermans Bend (22.25) include general policy relating to active frontages at ground level CCZ / BZ – decision guidelines include reference to active frontages DDO1 – Active street frontages – CCZ (refer http://planningschemes.dpcd.vic.gov.au/melbourne/ordin_ance/43_02s01_melb.pdf) Applies to only selected streets in the CCZ (refer http://planningschemes.dpcd.vic.gov.au/melbourne/ordin_ance/43_02s01_melb.pdf) Design objectives concentrating on active frontages Requirements provide controls for retail core and 	 Local planning policies / GHDRD recognise the importance of active frontages for creating an interesting pedestrian environment. Limited application of DDO1 which sets out controls. For instance, DDO1 does not apply to Southbank, Docklands and proposed URAs. DDO1 also provides controls in terms of a defined range of active frontage - entry or display window and /or food and drink versus customer service areas and activities. C171, C190 and C196 propose active frontage provisions. Recommendations Assess whether the existing provisions have been effective particularly in terms of type of active frontage being provided (noting that C171, C190,

Issue	MPS/PSA	Comments and recommendations
	identified major pedestrian areas GHDRD (15) – includes guidelines relating to active frontages C171 (Southbank) - proposed DDO1 includes new requirements for Southbank C190 (Arden-Macaulay) – proposed DDO60 includes controls for primary streets C196 (City North) – proposed DDO61 includes controls for Elizabeth Street, Peel Street, Grattan Street, Swanston Street and Queensberry Street	 C196 propose new controls for URAs but Docklands does not have specific requirements). Based on statutory planning experience / discussions, the existing combination is effective; however, given limited DDO1 definition of what constitutes an active frontage, the MPS might be having the unintended outcome of providing excessive retail / hospitality space at ground. On this basis, there is potential to expand / shore up our understanding of what constitutes active frontages and therefore an interesting street for pedestrians. For example, an interesting active frontage could include well designed residential / office uses or even utility spaces such as bicycle parking).
10. Passive surveillance at upper levels Location of large car parks overlooking a street undermines the pedestrian environment on the footpath. What does the planning scheme say about this and could these provisions be improved/stiffened? (Richard Smithers)	Local planning policies - Urban Design within the CCZ (22.01), outside the CCZ (22.17), Docklands Zone (22.18) include general policy relating to active frontages but not specifically relating to passive surveillance at upper levels. However, general policy not supportive of blank walls. Local planning policies – Urban Design within Fishermans Bend (22.25) includes general policy relating to active frontages at ground and lower levels C171 (Southbank) - proposed CCZ3 decision guidelines reference visual relationship between occupants of upper floors and pedestrians and car park casing for first five levels	 Limited existing guidance regarding passive surveillance at upper levels but general policy not supportive of blank walls and therefore, resulting in passive surveillance from upper levels. Issue arise in terms of construction costs particularly in areas where geotechnical conditions leads to car parking above ground instead of basement. In these cases, upper levels of the podium tend to be metal screening to car parking with limited passive surveillance. C171 and C196 propose guidance for surveillance at upper levels. C190 does not relate to upper levels, which could be a potential issue as basements will be limited given flooding potential.
	C190 (Arden-Macaulay) - DDO60 includes controls for	Recommendations

Issue	MPS / PSA	Comments and recommendations
	active frontages at ground for primary streets but not upper levels C196 (City North) - DDO61 includes design objectives and requirements relating to passive surveillance for first five levels	 Based on statutory planning experience / discussions, the existing provisions are effective apart from locations where car parking is commonly being provided above ground due to high construction costs particularly in areas with poor geotechnical conditions. In these situations, there is sometimes an ability to negotiate an active skin but this is not always successful. The above issues could be addressed through the extension of local policy provisions at 22.25 across 22.01, 22.17 and 22.18 together with C171, C196 and similar interventions in Docklands and Arden-Macaulay. This extension would have to be supported by evidence – CPTED principles, City Safety Team, C171 panel evidence, Safer Design Guidelines for Victoria (DPCD).
11. Footpath trading Does the planning scheme have any impact on the allocation of space on footpaths for trading? (Richard Smithers)	Local law issues rather than MPS	Local law issues rather than MPS
12. Public Acquisition Overlays Some pedestrian overlays exist. Why do these exist. Are they useful for the future and should they be retained? (Richard Smithers)	 PAO5 and PAO6 – Public Acquisition Overlay – Footpath / road widening (PAO5) and pedestrian way (PAO6) (refer <u>http://planningschemes.dpcd.vic.gov.au/aavpp/45_01.pd</u> <u>f</u>) Applies to only selected sites in CCZ (refer <u>http://planningschemes.dpcd.vic.gov.au/melbourn</u> <u>e/maps/melbourne08pao.pdf</u>) 	 There are limited locations in CCZ where PAO5 and PAO6 apply. Some of these locations are no longer relevant; for example, we have allowed development with a setback instead of acquiring land for footpath widening. Are there additional locations where acquisition would be considered?

Issue	MPS / PSA	Comments and recommendations
		 Recommendation Review PAO5 and PAO6 to remove those no longer relevant and add where footpath widening via acquisition still considered. Refer below to through-block links where PAOs is a possible mechanism .
13. Shared access zones	The MPS provides limited guidance for shared access zones specifically but general support for an integrated, safe and high quality pedestrian network.	 Limited guidance within MPS. Need for VicRoads authorisation could be acting as a disincentive for developers.
	Shared Zones require VicRoads Memorandum of Authorisation. According to ESG (Veronica Skrzyniarz), they are supportive of shared zones subject to a number of criteria taken into consideration. The essential criteria is that the vehicle numbers are very low and that pedestrian volumes well exceed vehicles	 Recommendations Review approvals process for shared access zones and determine whether VicRoads authorisation is acting as a disincentive. Refer below to through-block links where shared access zones are a possible mechanism.
14. Through-block links Short blocks, through-block links and a rich network of route choices for pedestrians are a key part of creating a walkable city. Via C171 Council tried (and failed) to change the planning scheme to require that through-block links be created when land is developed. Was our proposition right? Could it have been improved? What work is required to back up a good proposition? How would it apply all over the city?	Local planning policies – Urban Design outside the CCZ (22.17), within Docklands (22.18) and Fishermans Bend (22.25) includes general policy relating to providing pedestrian permeability through a site. Urban Design within the CCZ (22.01) does not reference pedestrian permeability through a site. GHDRD (15) – includes guidelines relating to pedestrian permeability C171 (Southbank) – attempted to include Map 2 to 22.01 with preferred locations for pedestrian links. Not supported by Panel as (1) it would enshrine a schematic map in the MPS and (2) issues with some links	 Selected provisions recognise the importance of pedestrian permeability. C171 – adopted version sent to the Minister for approval removes reference to Map 2 but includes design standards both as suggested by Panel and additional including one connection per 100m street block length. Awaiting C171 response which will impact C190 / C196. Land Survey has confirmed that POS contribution is strictly for 'green open space or a piazza' not a through-block link.

Issue	MPS / PSA	Comments and recommendations
(Richard Smithers)	identified. Panel advised to 'negotiate the outcome, rather than mandate'. C190 (Arden-Macaulay) – DDO60 includes controls consistent with C171	• There are some examples where a through- block link has been negotiated on the basis of existing provisions but also many missed opportunities. Review successful and unsuccessful examples to determine effectiveness of existing provisions.
	C196 (City North) – DDO61 includes controls consistent with C171	 In addition to review of examples, undertake research to determine: Ideal level of permeability for a walkable city Appropriate method in MPS for defining need for additional permeability (eg. C171 lot size threshold) Mechanisms for achieving links (such as PAOs, shared access zones or 'carrots' for developers [eg. Martin Williams: plot ratio bonus])
15. Pedestrian generation rates Different developments generate different transport demands. We are	Pedestrian generation rates are not currently considered in MPS unlike car parking and bicycle parking.	 Pedestrian generation rates not included in MPS. MPS is not the best tool to deal with pedestrian generation from public transport.
different transport demands. We are familiar with developments requiring	ESG does provide commentary on traffic generation for large developments but this is focussed on car traffic.	Recommendations
car parking based on the number of trips that they will generate. Mia has been researching into generation rates for pedestrian trips in oversea. jurisdictions. Do we have anything in the existing scheme about this?	According to ESG (Veronica Skrzyniarz), Part 13 of the Austroads Guide to Traffic Engineering Practice - Pedestrians (1995) sets out on page 9 that 'in the absence of detailed survey results, reference can be made to Table 1.2 - Area per person According to Use,	 Identify key pedestrian streets with poor level of service (which will be exacerbated by pedestrian generation created by the approval of new development) and consider one or both of the following:
Could the planning scheme be changed to require developers to build pedestrian infrastructure to cope with the increase in pedestrians that a new development will produce	from the building code of Australia, 1990. This can provide a general guide to the potential for pedestrian generation from a particular facility'. In addition, Veronica believes that this data 'coupled with Journey to Work data would be the best way to forecast pedestrian	 A mechanism to seek engineering input / advice for large developments on any identified key problem streets (possible short-term intervention pre any PSA) A PSA (such as an overlay) to apply level of

Issue	MPS / PSA	Comments and recommendations
or at least to analyse the pedestrian impact so we can plan better for it? How would we go trying to get something into the planning scheme that required developers to do modelling of future pedestrian flows to and from their development, laying that on top of existing flows to see if we need to expand or change the pedestrian network. Could we require this for new tram stops (or changed stops) and train stations as well? (Richard Smithers)	generation'. Pedestrian generation and flow has been a consideration for large events such as football matches in Docklands. Tram stops / train stations commonly do not require planning permits (unless located in an overlay such as Heritage). Therefore, the MPS is not the best tool to deal with pedestrian generation from public transport.	service / pedestrian generation rates for identified key problem streets. The provision will also have to identify possible mitigation actions for developers (long-term intervention). Any PSA would also ultimately involve engineering input.
16. Land Use Mix I would add to this list land use zoning as this determines the geographic disposition of various land uses which can degrade or enhance the walkable proximity between land uses such as homes to supermarkets to work etc (David Mayes)	Zone	 Land use mix is influenced by the purpose and permit triggers of the designated zone. Actual resulting land use mix can be more marketdriven in areas zoned CCZ / DZ where many uses do not require a permit (or 'as of right' uses). In DZ, resulting uses are also influenced by the DPOs which link to the approved development plan (originally named outlined development plan) Recommendations Assess whether the existing zones have been effective with particular focus on areas zoned CCZ and DZ. Rezoning or the application of a DPO are the key available mechanisms to alter land use mix but this would be a significant shift to the current regime for land use zoning in CCZ / DZ requiring a strong case for greater control to

Issue	MPS / PSA	Comments and recommendations
		improve outcomes for pedestrians. In addition, rezoning / DPO would not guarantee a better land use mix for pedestrians as there remains a market-driven element.