

6 May 2010

Mr Les Wielinga
Director-General
NSW Transport and Infrastructure
GPO Box 1620,
SYDNEY NSW 2001

By email: consultation@transport.nsw.gov.au

Dear Mr Wielinga,

Re: Metropolitan Transport Plan

The Urban Taskforce is a non-profit organisation representing Australia's most prominent property developers and equity financiers. We provide a forum for people involved in the development and planning of the urban environment to engage in constructive dialogue with both government and the community.

We are pleased that the NSW Government is working towards the integration of transport and land use planning. Developing a Metropolitan Transport Plan in concert with the Metropolitan Strategy review process could encourage greater opportunities for urban renewal while also contributing to the creation of liveable urban environments across the metropolitan region of Sydney.

The NSW Government's latest transport plans have the potential to make Sydney a better place to live and work. The plans are clearly an effort by the government to make a fresh start. It seems there is an increased emphasis on transport plans that are practical and will deliver for more people. The \$4.5 billion Western Express CityRail Service strengthens the role that Parramatta, Penrith, Blacktown and Richmond can play in Sydney's future.

Investment into major transport infrastructure including metro rail, conventional rail, motorways and other arterial road upgrades must proceed. This investment is crucial to the future of Sydney. It will be more difficult for Sydney to accommodate new housing made necessary by anticipated population growth and demographic change without new and expanded transport infrastructure. **The more that is invested in new, well-planned transport infrastructure, the easier it will be for Sydney to respond to the growth challenge it faces.** Furthermore, increased co-ordinated investment will also inspire business confidence and encourage private sector investment in transport-orientated urban development projects.

These comments are provided in response to the transport-specific elements *Metropolitan Transport Plan – Connecting the City of Cities*. The Urban Taskforce will provide **separate** comments for the Metropolitan Strategy Review. The separate submission will include our detailed comments on land use, employment and population issues.

1. Sydney's congestion challenge

There is no doubt that Sydney's transport infrastructure is in need of renewal. Congested roads and overcrowded railway carriages are common during peak hours.

The Bureau of Transport and Resource Economics (BTRE) has found that:¹

- Total travel in Australian urban areas has grown ten-fold over the last 60 years. Private road vehicles now account for about 90 per cent of the total urban passenger task (up from around 40 per cent in the late 1940s). The current trend of near linear increases in aggregate

¹ Bureau of Transport and Regional Economics (2007) *Estimating urban traffic and congestion cost trends for Australian cities Working Paper No 71* p. Xv.

urban traffic is forecast to continue over the projection period, with total kilometres travelled growing by 37 per cent between 2005 and 2020. Commercial vehicle traffic is forecast to grow substantially more strongly (averaging around 3.5 per cent per annum) than private car traffic (at about 1.7 per cent per annum).

- BTRE estimates of the 'avoidable' cost of congestion (i.e. where the benefits to road users of some travel in congested conditions are less than the costs imposed on other road users and the wider community) for Sydney were \$3.5 billion in 2005, raising to \$7.8 billion by 2020 (under a business-as-usual scenario).²

The problems of existing levels of congestion will be further complicated by the growth and demographic changes that Sydney is facing. The *City of Cities: A Plan for Sydney's Future: Metropolitan Strategy* ("the Metropolitan Strategy") said that Sydney will need an extra 640,000 new homes between 2004 and 2031. However, revised population figures stated in the Metropolitan Strategy review predict an even greater pollution increase. Forecasts suggest that our population will reach 6 million by 2036. This represents an increase of 1.7 million since 2006. To have any hope of meeting housing needs, Sydney will need 770,000 additional homes by 2036.

The government is planning for Sydney's housing needs to be met through both medium-to-high density homes within the existing urban footprint ("infill development") and a significant increase in housing within the North West and South West Growth Centres ("greenfield development"). The government is now committed to ensuring 70 per cent of Sydney's new housing is met through infill development, although in 2007/08 it accounted for 84 per cent of development.³

Population and employment will be distributed across the Sydney region, with significant new clusters in the North West and South West of Sydney. Our transport system must be one that is able to cope with travel demands of those from the new outer growth areas towards Sydney's central business district and Parramatta, but also provide for those who require cross subregional travel to fulfil work and leisure travel demands.

Our growth pattern, current and planned, suggests that a radial rail network centred on the Sydney CBD cannot meet community need or expectation on its own. While the existing rail network requires urgent upgrade, provision must be made for other modes of transport to provide the "cross links". This means that no single transport solution is possible. What will ultimately be required is an integrated system that may include:

- an upgraded, conventional rail system for predominately suburban travel;
- a metro system for urban travel (within the middle and inner ring suburbs);
- a light rail system for inner city areas;
- new and expanded motorways for cross urban and suburban travel;
- an upgraded network of arterial roads to deal with pinch points across Sydney, which include greater provision for bus lanes and expanded intersections with bus priority lanes.

It should be noted that improvements to roads are essential to enable the expansion of the bus network as suggested in the Metropolitan Strategy. Roads are not just for the private motorcar. Good quality motorways provide fast, efficient and flexible transport options for public and private transport and will remain essential for freight movements.

It is encouraging to note that the Metropolitan Transport Plan recognises the need for these urgent improvements. Unfortunately we are in a planning vortex. That is, Government is continually producing plans and strategies, but little on the ground improvements is being made. The time has come for less planning and more action. Delivery on the promises made in the plan is how the Government's performance will be judged.

² The complex nature of congestion effects leads to reasonable levels of uncertainty in such cost estimations. However, irrespective of questions over exact dollar valuations of congestion costs, sensitivity testing implies that, in the absence of improved congestion management, it will be challenging to avoid escalating urban congestion impacts, given the rising traffic volumes expected within the Australian capital cities.

³ NSW Department of Planning, *Metropolitan Development Program 2008/09 Report* (2009) 79.

2. Land use planning is fundamental to good transport

The quality, positioning and price of public transport are clearly very important, but they are not the sole determinants of the success of any new public transport service. The type of urban development that is permitted in the vicinity of the key transport nodes also strongly influences patronage.

Experience with the Liverpool to Parramatta Bus Transit Way has shown that merely investing and building infrastructure does not guarantee acceptable levels of patronage. The NSW Government invested \$346 million into the project. Since its opening in February 2003 it has been continually plagued with poor patronage. A key problem with this project is no changes to land use planning were made in parallel with project planning. Even the 2008 Liverpool local environmental plan fails to rezone land in the vicinity of the transit way for higher density uses.

In the most basic terms, if we want people to use new public transport, then we need to provide more than just the physical infrastructure. What occurs in the vicinity of new services will have a measurable impact on usage. Conversely, the new services should influence development activity in their vicinity.

It is now well understood that “land use patterns have a significant influence on how well public transport services can be delivered and utilised”.⁴ By introducing more land use flexibility in the vicinity of new transport infrastructure, the infrastructure itself benefits in terms of patronage, and therefore viability.

Diversity of land uses at transit stations

It's crucial that state environmental planning policies and local environment plans be amended to ensure that, at each new transit station (including bus transit ways and bus stops on bus lanes) all the land uses that are necessary for a viable, attractive and desirable community centre are permissible. Fundamentally, plans need to be developed that reflect diversity.

Such a plan should include elements and/or policies that:

- promote diversity of use;
- emphasise compactness;
- foster intensity;
- provide for accessibility; and,
- create functional linkages.⁵

However, diversity is not just another way to say “density”. Diversity is encouraged by density, but successful places include a mix of uses, including jobs, retail and hospitality services, apartments and other attractions all coexisting within a definable location working together to make a centre attractive and successful.⁶

A zone like the Standard Instrument's⁷ mixed use zone offers a market friendly means of accommodating high intensity employment and residential uses in a single zone.⁸ That is, once the decision has been made that the infrastructure of an area is suitable for high intensity uses, it does not matter what mix of uses ultimately emerges. This can be managed through market processes. A mixed use zone, properly implemented,⁹ allows this to happen. Other zones that

⁴ Alford, G., 2006, Integrating Public Transport and Land use Planning – Perspectives from Victoria. *Australian Planner*, Vol. 43, No. 3, pp. 6-7.

⁵ Glass, G., 2005, Honey I sunk the railway line. Do you want me to tidy up the rest of the town?. Paper presented at the Transit Oriented Development Conference, Fremantle, Western Australia 5-8 July 2005. [<http://www.patrec.org/conferences/TODJuly2005/papers/Glass.G.pdf>, accessed 7 April, 2008].

⁶ Newman, P., 2004, *Metropolitan Strategy*. Paper presented at the Sydney Futures Forum, Sydney 19 May, 2004.

⁷ The “Standard Instrument” is the template used for all post-2006 zoning plans. It is contained in the *Standard Instrument (Local Environmental Plans) Order 2006*.

⁸ If residential flats and multi-dwelling housing were reinstated as a mandatory permissible use in the mixed-use zone.

⁹ By “properly implemented” we are referring to a mixed use zone that does not contain backdoor means of discriminatory against different high intensity uses. An example of such discrimination is offered by the *Draft Burwood Town Centre Local Environmental Plan 2008*, which zones for mixed uses, but then has discriminatory floor space ratios based on whether the use is retail;/commercial or residential.

could offer a more flexible approach are the enterprise corridor zone (if modified) where office, retail, residential and light industrial uses could be flexibly mixed, and the business park zone (where retail, office and light industrial uses should be able to be mixed, if the standard instrument were appropriately amended).

The benefits of mixed-use zoning are articulated in the report *Liveable Centres*.¹⁰ However these benefits are often not realised because of planning criteria that requires authorities to be 'certain' that they can deliver on sector based targets for commercial office, residential, retail, etc. When land is able to be used flexibly for different uses, planning authorities do lose control as to the precise use of the land. This is ultimately in the public interest because it allows the market to do what it does best – deliver the product that delivers the greatest value to the economy and community.

In the greater scheme of things there is little risk that, for example, housing will displace commercial development across a region; or conversely that retail will displace housing. All will ultimately find their place based on the strength of demand for such property assets within community.

Too many planning authorities view zoning as an exercise in dividing up a fixed amount of development across different geographic areas. They frequently fail to appreciate that by putting in place restrictive zoning, the economic and social value of development is reduced. The use of multi-use zones should be encouraged, to avoid sterilising land in the event that the market does not seek to develop some or all of the land made available by, for example, a commercial core zone (that only authorises commercial office buildings, but not new homes). An undeveloped or under-developed site will not generate patronage for new public transport services.

Density

If the densities are not sufficiently high, transit stations will not attract enough passengers.¹¹ Moreover, without an appropriate mix of complementary land uses, people will be less inclined to use the public transport, as their ability to access a variety of destinations will be limited.¹²

Research consistently shows that density has a significant impact on the use of public transport. For instance, it was found that every 10-percent increase in population density was associated with about a 6-percent increase in boardings at transit stations.¹³ Furthermore, most urban services cannot be provided unless there are a certain number of people that can make them viable.¹⁴

Role of local government

Developing vibrant mixed use centres supported by a transit station requires a planning authority to be willing to be innovative in encouraging and responding to development opportunities.¹⁵ By nature, local government is closely tied to local issues, which on occasion makes it difficult for this level of government to look at the bigger, regional picture. If implementation is going to be left to local councils to handle by themselves, there will be much

¹⁰ The report is available on the internet: <<http://www.urbantaskforce.com.au/attachment.php?id=2375>>.

¹¹ Pushkarev and Zupan 1977, in Cervero, R., Ferrell, C., and Murphy, S. 2002, Transit-Oriented development and Joint Development in the United States: A Literature Review. Transit Cooperative Research Program. Research results digest. October 2002—Number 52 [http://onlinepubs.trb.org/Onlinepubs/tcrp/tcrp_rrd_52.pdf, accessed 7 April, 2008].

¹² Cervero, R., Ferrell, C., and Murphy, S. 2002, Transit-Oriented development and Joint Development in the United States: A Literature Review. Transit Cooperative Research Program. Research results digest. October 2002—Number 52 [http://onlinepubs.trb.org/Onlinepubs/tcrp/tcrp_rrd_52.pdf, accessed 7 April, 2008].

¹³ Parsons, Brinckerhoff, Quade and Douglas et al. 1995 in Cervero, R., Ferrell, C., and Murphy, S. 2002, Transit-Oriented development and Joint Development in the United States: A Literature Review. Transit Cooperative Research Program. Research results digest. October 2002—Number 52 [http://onlinepubs.trb.org/Onlinepubs/tcrp/tcrp_rrd_52.pdf, accessed 7 April, 2008].

¹⁴ Newman, P., 2005., Transit Oriented Development: An Australian Overview. Paper presented at the Transit Oriented Development Conference. Fremantle, Western Australia 5-8 July 2005.

[<http://www.patrec.org/conferences/TODJuly2005/papers/Newman%20paper%20REV.pdf>, accessed 7 April, 2008].

¹⁵ Ibid.

less achieved, as projects are generally watered down by local reactions.¹⁶ Despite recent planning reforms, local government retain substantial control over zoning within their boundaries.

Compact, mixed-use development permitted by flexible environmental planning instruments will be critical to the success of any transport project. Essentially the NSW Government must ensure that their strategic aims for centres and corridors supporting, and supported by, new public transport services are implemented via a clear statutory planning mechanism that requires appropriate density and land use mix in appropriate locations. This could be achieved in consultation with local councils, but should not be left entirely for local government to implement, as invariably, if it is just left to local government, the regional perspectives are lost.¹⁷

In summary:

- **The best way to get people to use new public transport infrastructure is to maximise the number of people who live and work within walking distance of its transit stations.**
- **Land use planning which retains low or medium density development controls within the vicinity of a transit station will condemn a project to low levels of patronage.**
- **Artificial and unnecessary restrictions on the kinds of development close to transit stations** (for example, prohibitions of one or more retail, commercial and business premises, or residential uses) **can also cripple efforts to boost patronage.** This occurs because there will be less destinations of interest along the transit network and restrictions on use will retard the rapid redevelopment of sites).

Light rail service from Barangaroo to Dulwich Hill

We welcome the commencement of a pre-construction study on the \$500 million expansion of Sydney's light rail line but this needs to be matched with an urgent review of zoning laws along the line's route.

The new tram line, announced in the Metropolitan Transport Plan, includes up to 20 new stations and could run from the city to Dulwich Hill, much of it along an existing disused rail line, surrounded by low density housing and industrial land.

The planned light rail extension into Dulwich Hill provides an opportunity for more of Sydney's new housing to be accommodated around high quality public transport. New compact, pedestrian-friendly, mixed-use neighbourhoods should bring together housing, workplaces, shopping and recreation areas within walking distance of the light rail service. The government will be wasting its investment if significant apartment, retail and office development is not also permitted along any new light rail corridor.

Work on reviewing the zoning of land in this corridor should start immediately.

We want this new transport infrastructure to be a success – this means, from day one, there should be sufficient numbers of people living and working in close proximity to the line to ensure it is well patronised.

3. Rail improvements

Suggested rail upgrades servicing the North West

The North-West Sector will accommodate a significant proportion of Sydney's population growth, and the provision of efficient transport solutions is desirable. Approximately 70,000 new homes will be needed in the north west growth area of Sydney to accommodate predicted population growth and demographic change.

The key transport requirements to support population growth are the provision of a fast, frequent and reliable transit link into the Sydney central business district. The provision of rail to the

¹⁶ Newman, P., 2005., Transit Oriented Development: An Australian Overview. Paper presented at the Transit Oriented Development Conference. Fremantle, Western Australia 5-8 July 2005. [<http://www.patrec.org/conferences/TODJuly2005/papers/Newman%20paper%20REV.pdf>, accessed 7 April, 2008].

¹⁷ Newman, P., 2006, Transport greenhouse gas and Australian Suburbs: What Planners can do. *Australian Planner*, Vol. 43, No. 2, pp. 6-7.

Northwest continues to be our preferred transport option. Whether the technology is metro or conventional heavy rail is not the central issue of concern to us (although we note that metro systems are more suitable for servicing inner and middle ring suburbs, rather than outer suburban areas). Our priority is on the provision of adequate transport to meet the needs of a fast growing population at the right time.

Suggested rail upgrades servicing the South West

Like the North-West Sector, the South Western area of Sydney will also seek significant growth in population. The South West Growth Centre will ultimately have 110,000 new homes.

To meet the most basic travel demands of this population centre, the promised South West rail link connecting the Growth Centre at Leppington to the existing rail network is essential. Without the timely provision of this missing 13 kilometre rail link, residents will be forced onto already congested roads for the vast majority of their transport needs. There will be no other viable option for the great majority of South Western Sydney residents.

The Urban Taskforce is of the view that such rail projects must proceed if there is to be equitable access to transport for all Sydney residents. Equitable access to transport brings with it significant social and economic benefits to the community.

Suggested rail upgrades servicing Western Sydney

It is well known that City Rail's western line is the most used, but unfortunately, the most congested part of the metropolitan rail network. The Urban Taskforce is a strong supporter of the Westmead to Sydney CBD West Metro as a way of improving access to the city centre from Western Sydney. Such a rail project would certainly alleviate congestion and vastly improve service along the most patronised public transport route in Sydney.

Suggested rail upgrades servicing the inner and middle rings of Sydney

Effective metro has the potential to improve travel within the inner and middle ring suburbs and relieve congestion experienced on the existing network.

However, the broader network of metros to serve heavily used and congested bus corridors, such as Parramatta Road, Victoria Road, Anzac Parade and Military Road, is the key to addressing transport constraints that restrict and impact on urban living. The two new metro lines, Metro West and Metro East are important additions to our transport network.

Suggested rail upgrades to improve freight movements

While there is an urgent need to improve rail to make public transport efficient and attractive, there is also a need to improve rail for freight movements. To achieve the State Government's target of increasing container movements to and from Port Botany by 40 per cent, the capacity of the existing Port Botany freight line must be increased. Three new intermodal terminals would also be required at Enfield, Moorebank and Eastern Creek. At this stage only the Enfield project has approval. All intermodal terminals are critical to our transport future and must be considered.

The southern and northern freight lines are also needed to avoid conflict between commuter rail traffic and freight. Construction has commenced on the southern rail line, however, the Northern line is still in the planning stage. These projects must be progressed.

4. The need for investment in motorways and other arterial roads should not be overlooked

The development of residential areas and centres that are dense, compact, with a mix of uses, supported by high quality public transport will encourage some to travel less by the private motor car. In fact, some may even choose to do without a car altogether. However, it can't be assumed that building better neighbourhoods with a rapid transit station/stop at the core will encourage all people out of their cars.

We are concerned that there is no clear vision for development of new motorways or other significant enhancements to Sydney's road network in the transport plan.

Public transport is suitable for moving large numbers of people into particular hubs, but lacks the flexibility to deal with a whole range of journeys whose start and end points are not within an area of high residential or employment density. A growing proportion of all travel activity is regional and cross regional, while the existing and proposed rail system is predominantly radial (towards the CBD).

For example, weekend trips to major parks, visits to homes of friends, and trips to workplaces in decentralised locations are more likely to require high quality road transport than public transport. **For this reason, any transport strategy that only involves investment in public transport, at the expense of road transport, will not be successful.** Sensible land use and transport planning allows for all modes of transport (cars, transit, walking and cycling) and plans must consider and integrate these.¹⁸

The introduction of cross-regional direct bus services rely upon efficient, high capacity road corridors. The benefits of continuing to provide road infrastructure includes the ability to spread the transport load across a rail and road system. Road based public transport comes at a lower cost that can provide greater service coverage for all residents. **Improved bus services, particularly bus transit ways, can be used as an interim step to service areas that do not yet have the population necessary to support a new rail service.**

New or upgraded roads can deliver environmental benefits associated with reduced congestion and the potential to provide improved, rapid bus services.

Suggested road upgrades servicing North Western Sydney

The NSW Government must consider other motorway connections or “missing links”. For example the North Western Corner of the Sydney Orbital “feeding” the M2 and M7 will improve connection to the North Western Growth Centre. It is understood that current road reservations are in place for such a project.

Suggested road upgrades servicing South Western Sydney

The M5 corridor is highly congested in peak periods and the existing M5 East is already operating at capacity throughout the day. The Urban Taskforce argues that there will be a need for the duplication and enhancement of the M5 in the not too distant future. For instance, the M5 East project has become an obvious priority for the Sydney network given that it feeds the Sydney Airport and Port Botany areas and is also the key connection from Sydney’s growing South Western regions. We are advised that the Government has recently completed its feasibility study into options for the duplication and it may be in a position to progress this project in the near term. We understand that negotiations are under way between the Government and the private owners. Following completion of negotiations on the M2, we trust that the M5 widening project will be finalised.

Furthermore, given the time period covered by the Metropolitan Strategy, Government should note that the M7 motorway may also require capacity enhancement prior to 2036. The M7 was designed to allow expansion to three lanes when the need arises.

Other significant upgrades to roads servicing the South Western Sydney population will include:

- widening of Camden Valley Way to four lanes between Bernera Road and Cowpasture Road;
- widening of Cowpasture Road to four lanes between the M7 Motorway and North Liverpool Road;
- widening of Cowpasture Road to four lanes between Camden Valley Way and Main Street;
- widening of Hoxton Park Road to four lanes between Banks Road and Cowpasture Road; and,
- upgrade of Camden Valley Way between Cowpasture Road and Narellan Road.

¹⁸ Mackay, M., 2005, Don’t think Transit-oriented development, think transport-oriented development. Paper presented at the Transit Oriented Development Conference. Fremantle, Western Australia 5-8 July 2005. [<http://www.patrec.org/conferences/TODJuly2005/papers/Mackay.M.pdf>, accessed 7 April, 2008]

Completing the Bringelly network upgrades will vastly improve the access to the South West growth centre.

This investment into road upgrades is crucial to making the South West an integrated part of the metropolitan area.

Suggested road upgrades servicing Western Sydney

Western Sydney relies heavily on the M4 motorway to provide alternative transport access to regional cities and major centres including Penrith, Parramatta, Burwood and Sydney. Whilst congestion along many sections of the motorway during peak hours is experienced, congestion is at its worst, for much of the time at its end. Furthermore, heavy vehicular traffic along Parramatta Road to the city centre means that those working and residing in this urban area will continue to suffer poor amenity.

The M4 East project has been mooted for many years in various forms. The lack of a motorway standard connection from the existing M4 to the Sydney CBD is a vital "missing link" in the Sydney network. The potential to connect the M4 East to Port Botany via what is known as the "Marrickville Tunnel", should also be investigated as a future network solution to improve access to Sydney's Western suburbs and relieve congestion on the M5 and M4 corridors.

Improvements to the M4, particularly three new motorway tunnel connections:

- linking the M4 at Concord to the City West link at Rozelle;
- linking Victoria Road at the Iron Cove Bridge to Rozelle; and,
- linking the other two new tunnels (from Rozelle) to the Airport

are desperately needed to alleviate hopeless traffic conditions.

Linking the surrounding regions to Sydney

The Central Coast population is expected to grow by 100,000 in the next twenty years. At least 56,000 new homes will be needed to meet this growth in population. By 2031, The Illawarra region's population is expected to increase by 47,600 people. At least 38,000 new dwellings will be needed to meet housing demands in this region. While new jobs are to be created in these locations, many will continue to access the Sydney Metropolitan area for employment. It will also be more feasible for businesses to locate in the regions, boosting local employment, if the road transport capacity to Sydney was increased and made more reliable.

Inter-urban rail connection to Sydney can always be improved. However, giving priority to road connections should also be considered. In particular, linking the M2 to the F3 is an essential "missing link" that must be provided to afford equitable access to Sydney from the Central Coast.

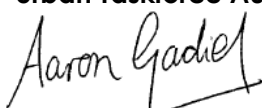
At least 335 million trips are made to Illawarra by road each year. These trips comprise resident, visitor and freight movements. The key transport challenge is maintaining adequate road access to nationally important industrial enterprises while ensuring safe and adequate commuter traffic. To relieve this pressure, consideration must be given to an extension of the F6.

The Urban Taskforce is committed to an integration of land use and transport planning and asks that you carefully consider the contents of this correspondence when investigating the transportation challenges facing Sydney.

Thank you for providing us with the opportunity to offer our comments. Should you require any further clarification of the content of this correspondence, please feel free to contact me.

Yours sincerely

Urban Taskforce Australia



Aaron Gadriel
Chief Executive Officer