

7 June 2010

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

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

Dear Mr Wielinga,

Re: Sydney Light Rail - Inner West Extension Study

The Urban Taskforce is an industry organisation representing Australia's most prominent property developers and equity financiers. Our membership also includes key infrastructure providers, economists, planners, architects and lawyers concerned with sustainable property development.

We are pleased that the NSW Government is progressing a light rail infrastructure project for the Inner West of Sydney. However for this project to be a success there is an urgent need for a coordinated state led review of planning controls along the proposed light rail route and also around proposed light rail stations. The introduction of the Inner West light rail extension, combined with changing or intensifying land use, has the potential to achieve a shift away from the car to alternative transport modes.

As stated in the *Sydney Light Rail - Inner West Extension Study* ("the study"), the new line follows an existing disused rail line, surrounded by low-density housing and industrial land. **Redevelopment of the existing low-density urban and industrial land is essential if light rail is to be a real alternative transport option to bus and/or conventional rail.**

The light rail extension into Dulwich Hill provides an ideal 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.

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.

Light rail will never compete with conventional rail if it is merely a commuter service to the Sydney CBD. The study itself observes that:

From a time perspective, light rail is not competitive with heavy rail for trips to the CBD (travel time to the CBD via CityRail would be around twice as fast as by light rail from equivalent origins).¹

That is why this project must offer something new and attractive for customers. There must be a series of attractive destinations along the whole route.

Below you will find the Urban Taskforce's suggestions for changes to existing planning in the vicinity of the project and suggested changes to the planning system generally to ensure that the Sydney Light Rail project has a chance of success.

¹ Page 7.

1. Land use planning is fundamental to good transport planning

Revised population forecasts reported in the Metropolitan Strategy review predict 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.

Government is now planning for 70 per cent of Sydney's housing needs to be met through medium-to-high density homes within the existing urban footprint ("infill development").

If we have any hope of meeting expected housing demand within established inner and middle ring suburbs, Government must show leadership by ensuring that land use controls in all local areas serviced by high quality transport infrastructure permit additional new compact, pedestrian friendly residential communities.

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 Transitway 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 plagued with patronage well below the levels envisaged in the original environmental impact statement. 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 transitway 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 its 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".² By introducing more land use flexibility in the vicinity of new transport infrastructure, the infrastructure itself benefits in terms of patronage, and therefore viability.

Residential and employment density

The aim of the Sydney Light Rail Inner West project includes the desire to establish stops in locations that optimise access to light rail and urban renewal. Furthermore, the study suggests that there is the opportunity to integrate land use and transport. This is due to the fact that the proposed light rail route generally traverses areas that comprise of mixed land uses of relatively high densities.

We do not dispute the fact that light rail has the potential to vastly improve and renew decaying urban areas. Nonetheless we are concerned with the suggestion that the area in the vicinity of the rail stops are of "relatively high densities". The question that begs asking is relative to where? If compared to suburbs at the edge of the Sydney Metropolitan region, with little or no access to public transport, then of course density in the vicinity of the proposed light rail will be considered to be "relatively" high. However, by any conventional measure, residential densities of 0.5:1 to 1:1 cannot be considered to be "high".

Floor space ratios of less than 0.75:1 are largely consistent with low density housing. Floor space ratios of 0.75:1 are typical for townhouse or terrace development. **Best practice planning in the vicinity of light rail would require floor space ratios in range of 2:1 through to 3:1** (which might allow buildings of between six and eight stories).

The study seems to have largely taken existing floor space ratios as a given. It is nonsense to expect existing densities as low as 0.5:1 to 1:1 within 800 metres of the proposed light rail corridor to remain. **It would be negligent on the part of state and local governments to not insist on**

² Alford, G., 2006, Integrating Public Transport and Land use Planning – Perspectives from Victoria. *Australian Planner*, Vol. 43, No. 3, pp. 6-7.

higher population and employment density in the vicinity of critical and costly public transport infrastructure.

What is an appropriate density along the proposed light rail corridor will depend on many contextual and environmental matters. However, based on preliminary, broad-brush assessment **we suggest developments of 6-8 storeys with a 70 per cent site coverage will provide opportunities to increase density within appropriately designed developments.** Such a development model will permit compact, pedestrian friendly communities, while respecting local amenity. It should be noted that **doubling of density will reduce the number of cars and vehicle miles travelled per household by 25 per cent.**³

If densities are not sufficiently high, transit stations will not attract enough passengers.⁴ 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.⁵

Research consistently shows that density has a significant impact on the use of public transport. For instance, every 10 percent increase in population density has been associated with a 6 per cent increase in passenger movements at transit stations.⁶ Furthermore, most urban services cannot be provided unless there are a certain number of people that can make them viable.⁷

The significance of population and employment densities as predictors of travel behaviour is undisputable. Studies reaffirm that residential density as being the most important built environment element which influences travel choices.⁸ It is clear that the elements of the built environment that exert a strong influence on travel behaviour are population and employment density.

Diversity of land uses at light rail stations

We accept that light rail cannot compete with conventional rail on travel times to the central business district of Sydney. This means that to make the proposed light rail service attractive to users, the service must travel to destinations that are different to those accessible by conventional rail (and/or bus services). That is, a customer must be given a reason to use the light rail service over conventional rail.

Extensive research on this issue is available and the general consensus is that along with an increase in residential and employment density, mixed land uses around station areas has become accepted practice as a means of increasing usage rates.⁹

Simply having grocery stores and other services within easy walking distance from homes tends to encourage public transport use. It is widely agreed that urban centres supported by mass transit should be diverse in their land-use compositions. Furthermore, mixed use can be an effective revitalisation tool. For example, a plan that provides the opportunity to build medium rise apartment buildings with ability to include non-residential uses at ground level, in the right location, supported by good quality mass transit is an attractive development proposition.

When seeking to determine the right land use mix, state and local planning authorities must consider the place and make place specific policies. Consideration must be given to those

³ Leck, E., 2006, The Impact of Urban Form on Travel Behaviour: A meta-Analysis. *Berkeley Planning Journal*, Vol. 19, pp. 37-58.

⁴ 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_rdd_52.pdf, accessed 7 April, 2008].

⁵ 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_rdd_52.pdf, accessed 7 April, 2008].

⁶ 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_rdd_52.pdf, accessed 7 April, 2008].

⁷ 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].

⁸ Leck, E., 2006, The Impact of Urban Form on Travel Behaviour: A meta-Analysis. *Berkeley Planning Journal*, Vol. 19, pp. 37-58.

⁹ Joshi, H., Guhathakurta, S., Konjevod, G., Crittenden, J. & Li, K., 2006, Simulating the Effects of Light Rail on Urban Growth in Phoenix: An application of the UrbanSim Modelling Environment. *Journal of Urban Technology*, Vol. 13, No. 2, pp. 1-21.

that will be relied upon to make the development happen including financiers and developers.¹⁰

It's crucial that state environmental planning policies and local environment plans be amended to ensure that, at each new station 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. The benefits of mixed-use zoning are articulated in the report *Liveable Centres*.¹¹

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.¹²

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.¹³

The light rail corridor should, at a strategic level, be formally regarded as a "renewal corridor" as per the Metropolitan Strategy. Renewal corridors are defined in this way:

Renewal Corridors generally follow transport and may join significant nodes or centres. The area of interest may be extended up to one kilometre across. They are usually a focus for commercial development and contain concentrations of employment, surrounded by or with the potential for complementary, higher density residential development.¹⁴

In terms of statutory planning, a zone like the Standard Instrument's¹⁵ mixed use zone offers a sensible means of accommodating high intensity employment and residential uses in a single zone (provided that residential flats and multi-dwelling housing are included as permissible uses). 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, allows this to happen.

2. Shift planning power from local to metropolitan levels

It is agreed that increased residential and employment density supported by quality transport options must be encouraged. Encouraging mixed-use neighbourhoods along public transport corridors and nodes makes environmental sense and are much talked of at local and state government levels. However, talking about increased density and land use mix is much easier than planning for it. Unfortunately, it is local government that has the real planning powers to permit development that supports sustainable urban environments. But it is this same tier of government that is most easily influenced by local residents who are the first to voice their strong opposition when new sustainable development is proposed in their "backyard". These local officials and residents are vocal in their general support of increased residential density and land use mix, provided it occurs elsewhere.

Developing vibrant mixed use centres supported by a light rail requires a local government willing to be innovative by encouraging and responding to development opportunities.¹⁶

¹⁰ Freestone, R., 2008, Better Planning and Research for Mixed-Use Developments. *Australian Planner*, Vol. 45, No. 1, pp. 14-15.

¹¹ The report is available on the internet: <<http://www.urbantaskforce.com.au/attachment.php?id=2375>>.

¹² 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].

¹³ Newman, P., 2004, *Metropolitan Strategy*. Paper presented at the Sydney Futures Forum. Sydney 19 May, 2004.

¹⁴ Ibid 300.

¹⁵ 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*.

¹⁶ Ibid.

However, 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 do by themselves much less will be achieved as projects are generally watered down by local reactions.¹⁷

It is widely accepted that local government has difficulty dealing with metropolitan planning challenges and planning transit facilities will not work well if not coordinated across local government boundaries. The absence of regional planning makes it difficult to implement planning policy needed to create new high-density development clusters around transit stations across local government boundaries.

It is undeniable that implementation of regional land use policies, such as increasing land use mix and residential density along a transport corridor is near impossible unless there is a significant shift in land use planning authority from local government to a higher level organisation.¹⁸ To enable appropriate planning around the proposed light rail stations and rail corridor to occur, there is an urgent need to shift planning powers for development in strategically important locations away from local governments that are hostage to local NIMBYs.

Essentially the NSW Government must intervene to ensure that its strategic metropolitan aims for centres supporting, and supported by, the proposed light rail 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 to local government to implement, as invariably, if it is just left to local government the regional perspectives are lost.¹⁹

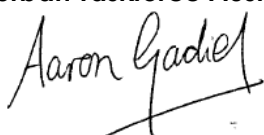
At the very least, in light of a new transport option becoming a reality in the very near future, the State Government must insist that planners at local and state levels become actively engaged in planning and redesigning the areas around the proposed light rail stations and along the light rail corridor.

If we want this vitally important public transport project to be a success, many more people must be living and working in close proximity to stations even before construction on the light rail project commences.

The Urban Taskforce is committed to an integration of land use and transport planning and 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 Gadiel
Chief Executive Officer

¹⁷ 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]

¹⁸ Downs, A. 2005, Smart Growth: Why we discuss it more than we do it. *Journal of the American Planning Association*. Vol. 71, No. 4, pp. 367-378.

¹⁹ Newman, P., 2006, Transport greenhouse gas and Australian Suburbs: What Planners can do. *Australian Planner*, Vol. 43, No. 2, pp. 6-7.