

Submission re draft SEPP 66: Integrating Land Use & Transport

**by the Institute for Sustainable Futures
University of Technology, Sydney
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1 SUBMISSION SUMMARY

The Institute for Sustainable Futures welcomes this opportunity to comment on the proposed State Environmental Planning Policy 66, Integrating Landuse and Transport, the Guidelines and supplementary documents. Over the last 10 years, the rationale for this policy – integrating landuse and transport to reduce the car dependence of our cities and towns – has become more apparent and urgent.

Pursuing this policy through the planning system has many benefits and is central to a package of measures to meet people’s needs for sustainable, healthy transport and reducing reliance on car use.

This Submission concentrates on the key issues in the draft SEPP66 that will make it an effective new policy. Its effectiveness can be assessed according to its aims. We concur with the SEPP’s aims, suggesting that walking and cycling has intrinsic values for health and social well-being, and it is only the demand for private car trips that needs moderating. It might well be helpful to make explicit the aim of reducing the emission of greenhouse gas from transport.

The scope of the SEPP is so confined that it does not extend the benefit of integrated planning to NSW towns and regions outside the Sydney, Newcastle, Wollongong area (2.4). We also recommend that smaller developments (less than 1,000 sqm gfa) should be picked up otherwise the uneven and cumulative effect of ‘non-integrated’ development stands to undermine urban design in localities. The set of documents, referred to in the strategy, are unsuited to be listed as the heads of consideration – for a development, small or large, we suggest a couple of checklists should be prepared for use by development control planners (3.1), and in monitoring at the annual review (2.3). The apparent escape clause, Clause 10, has not been justified and should be deleted. (2.7)

To avoid ambiguity, we recommend that the Guidelines, and possibly the draft SEPP itself, refer to the relationship to existing SEPP11 and *Guide to Traffic Generating*

Developments, and s94 Council Contribution Plans. Certainly, the Guidelines need to explain that SEPP66 is contributing to a supportive policy context indicated by a range of State agency plans (e.g. *Plan First*) and Council plans (e.g. Social Plans, Bike Plans, Pedestrian Access & Mobility Plans). (3.2, 3.3.,3.4, 2.8,2.9)

Councils will need greater support, in both skills and funding, to enable the physical works and maintenance of existing and planned infrastructure for walking and cycling to be on the ground within 5-10 years. Changes in car parking in new developments, and existing facilities, provide one opportunity for revenue raising, others should be explored, as a means of remedial funding for sustainable transport and urban amenity. (3.5,4.1,4.2)

Finally, this policy has the potential to improve greatly the quality of living in NSW cities and towns. It is certainly taking up a direction that is well overdue and it will need support by other aspects of the planning system (e.g. SEPP11, Traffic Committees, and s94 Contribution Plans). To moderate the traditional bias toward car dependent built environments, we recognise the change will not be easy and will take time (like smoking reduction campaigns). For this reason, we emphasise the importance of collateral policies and funding sources , and convergent interests between reducing motor traffic and reducing carbon dioxide emissions (economic and environmental goal) or reducing sedentary transport (equity and health goal).

2 INTRODUCTION

2.1 Institute for Sustainable Futures

This submission was prepared by the *Transport and Urban Form* Team at the Institute for Sustainable Futures (ISF), University of Technology, Sydney (UTS). The team comprises Dr Chloe Mason, Senior Research Fellow, Mr Kendall Banfield, Senior Research Consultant and Ms Sally Campbell, Research Consultant. ISF was established in 1997 by UTS at the Australian Technology Park, Eveleigh. Its mission is to work with government, industry and the community to develop solutions leading to sustainable futures through programs of applied research, consultancy and training.

This submission is in response to the public exhibition of Draft State Environmental Planning Policy (SEPP) No.66: *Integrating Land Use & Transport*, released for public exhibition in the second half of 2001. The Draft SEPP was prepared by planningNSW, Transport NSW and the NSW Roads & Traffic Authority (RTA).

The Draft SEPP package comprises five documents: (1) *Draft SEPP 66*; (2) *Overview*; (3) *The Right Place for Business & Services - Planning Policy*; (4) *Improving Transport Choice - Guidelines for Planning & Development*; and (5) *Employment & Journey to Work Patterns in the Greater Metropolitan Region - An Analysis of the 1996 Census Data*. In our submission, we refer to each of these documents as: (1) draft SEPP 66; (2) the Overview; (3) the Planning Policy; (4) the Guidelines; and (5) the JTW report.

2.2 Our approach

We welcome the intent of this draft SEPP for its contribution to the planning system's ability to support sustainable transport (walking, cycling and public transport), reduce car use and create a compact livable city. This is consistent with the direction being taken by other governments in Australia and throughout the world via legislation and policies such as the US *Transportation Equity Act for the 21st Century* (TEA21), UK Local Transport Plans, OECD sustainable mobility policies and the French *Plan for Urban Renewal*. The latter requires Urban Mobility Plans for conurbations of over 100,000 inhabitants and public transport is given right of ways as a lever for remodelling urban space. (EPOMM News 4/01 p.6)

We recognise the draft SEPP has the potential to reverse the traditional transport and land-use planning practice in NSW which has to date created unsustainable outcomes, including places that are hostile to people walking. In particular, the SEPP has the potential to reverse the traditional bias toward unsustainable modes (motor vehicles) and unsustainable land use patterns (car-dependent suburban sprawl). That change will not be easy - there are many large, entrenched and complex issues to be addressed. We also recognise that a single planning instrument cannot address all issues. It must be supported by a range of other legislation, policies and actions within and outside the planning system.

In our submission, we have focused on the draft SEPP, recognising that this is the key policy. It is appropriate that the Guidelines become the only supporting document. For further explanation, see Section 3.1 of this submission. We refer to the four other documents in the package as supporting documents.

3 COMMENTS ON THE DRAFT SEPP

3.1 Draft SEPP aims

Clause 2(c) refers to the objective of “moderating growth in the demand for travel...”. This objective for land use-transport policy implicitly refers to reducing the use of private motorised travel, which is typical of conventional travel demand management (e.g. Banister 1999). The statement should specify that it is the growth in demand for, and distances travelled by, car that needs moderating. (See Recommendations 1 to 4)

From a healthy, sustainability perspective, as required under the objects of the *Environmental Planning & Assessment (EP&A)* and *Local Government* Acts, the planning objective should be to provide amenable spaces that encourage walking or cycling by keeping distances short and providing accessible continuous paths of travel. For public policy purposes, the travel demand management approach is limited because it does not recognise the value of mobility for physical and mental health, and for maintaining the vitality of streets. The risk arises of a population lying on the sofa with mobile phones and modems and becoming more overweight! Therefore, Cl 2(c) needs amendment to: (i) moderate growth and distance travelled by car; and (ii) minimise travel distances in developments so that people can access many facilities by walking and cycling. (See Recommendations 1 to 4)

Clause 2(e) refers to providing for the efficient movement of freight. This statement should be expanded to consider the livability of neighbourhoods. (See Recommendation 5)

3.2 Draft SEPP strategy

Cl 3(2)(d) requires that the “need to moderate and manage travel demand” be taken into consideration, and that a specific way in which this should be done is “the way in which traffic impacts are studied, assessed and acted upon”.

Past experience with traffic studies prepared for strategic planning and development applications suggests that the methods for studying “traffic” are not sensitive to sustainable transport nor the distinction between cars and buses. For example, Randwick City Council received a traffic study of the impact of a proposed development on High St Randwick that equated the movement of cars and buses on a 1:1 basis. The study did not recognise the merits of public transport as a more efficient mode and thus ignored the fact that many more people are affected by delays to buses than to cars. In addition, the maps in Randwick's shopping centres landuse and transport study showed space for car parking and bus stops but neglected to show cycleways identified in Council's own bikeplan.

It has become NSW Government policy to manage the road asset for the efficiency of the road network, recognising the needs of all users (RTA (2001)). For efficiency, studies of traffic impacts need to focus on the movement of vehicles, people in vehicles and people walking. Since average car occupancy in Sydney has fallen to 1.1, it is essential to give priority to buses or trams at all hours, not merely within peak. Since much of the funding to councils is allocated by the NSW Government it would be desirable to link funding for road maintenance to performance standards for providing for all road users, particularly people walking, people waiting for buses and cyclists. (See Recommendations 6 & 7)

This Clause, and the SEPP more generally, necessitates the availability of continuing professional education to transport and traffic planners and urban planners (supported by professional associations, State and local government bodies) so as to enable the understanding and skills necessary to achieve more sustainable transport outcomes. Training is discussed elsewhere in this submission. (See recommendation 33)

It is not appropriate for the 'heads of consideration' for plan-making and assessing development applications to be a set of four documents (Clause 3(2)(b)). Documents are too broad to be useful. Strategic and development control planners alike would be reluctant to use these four documents as a basis for plan making and assessing development applications. This clause should instead include a checklist of key heads of consideration that reflect the intent of these documents. As mentioned elsewhere in this submission, a comprehensive checklist should guide the making of planning instruments and assessing applications for large developments, whilst a simplified list should guide the assessment of smaller developments (<1,000 sqm gfa). Both checklists should include provision for performance indicators to monitor progress on key criteria, which should inform proposed annual SEPP reviews. A process for data collection should be established prior to the making of the SEPP. (See draft SEPP 66 p.4 and Recommendations 8 & 9)

3.3 Floorspace threshold

It is noted that the draft SEPP only applies to medium to large developments (>1,000 sqm gfa). It therefore will not address the cumulative impact of smaller developments. Whilst we are mindful of the need to avoid unnecessary red tape in the approvals process for smaller developments, the draft SEPP should apply to all developments, both small and large. The appropriateness of the threshold should also be reviewed in 12 months time. (See draft SEPP 66 p.7)

There is a need for a simple checklist of heads of consideration, instead of the reference to a set of documents in Clause 3(2)(b). A comprehensive checklist should apply to larger developments (>1,000 sqm gfa), whilst a simplified checklist should apply to smaller developments. This would ensure that the approvals process is not unduly onerous. (See draft SEPP 66 p.7 and Recommendations 8 & 14)

3.4 Non-metropolitan regions

We note that the draft SEPP applies only to Sydney, Newcastle and Wollongong. Regional NSW has been excluded and no reasons are given as to why. Whilst the need for the SEPP is more obvious in the metropolitan area, it does have an important role to play in the regions as the same kinds of issues, such as car dependency, VKT growth, urban sprawl, access inequity, etc., are experienced there. These issues can be exacerbated by the fact that there is no comprehensive public transport system in these areas. The SEPP should also address issues particular to the regions, such as rural access inequity and tourist mobility. Thus the draft SEPP should apply to the regions and be supplemented by a separate checklist and set of guidelines dealing with regional issues. PlanningNSW's *Sustainable Urban Settlement: Guidelines for Regional NSW* may be of assistance here. (See draft SEPP 66 p.6 and Recommendation 15)

3.5 Agency consultation clause

We note that Clause 11 of the draft SEPP provides Transport NSW with a role to comment on development applications captured by the SEPP wherever appropriate. We are concerned that Transport NSW staff have not had the opportunity of training in sustainable transport to effectively perform this role. In addition, the RTA has responsibility, in conjunction with local government, for walking and cycling and since it is the prime road network manager, the RTA should be better placed to advise councils on sustainable transport matters, particularly because the RTA already plays an advisory role. (See draft SEPP 66 p.10 and Recommendations 16 & 17)

3.6 Mixed uses

Clause 8(e) of the draft SEPP lists provisions to be included in planning instruments that can bring about reduced car use. This Clause should include a provision for mixing land uses. Guidelines Principle 2 (mixed uses) should mention that there is a slight tradeoff with mixed uses with regard to VKT reduction as small commercial

uses in suburban areas may increase cross commuting. We believe however that this tradeoff would be outweighed by the VKT reduction benefits of mixed uses in bringing about local employment opportunities. The Guidelines should also mention the benefits of shop-top housing and corner stores in reducing VKT and creating better communities. (See draft SEPP 66 p.8, Planning Policy p.7, Guidelines p.9 and Recommendations 18 & 19)

3.7 Escape clause

We are concerned that Clause 10 of the draft SEPP: *Consistency with metropolitan planning instrument* and the associated *net community benefit* assessment criteria may be used as an escape clause by councils and developers. We suggest it be deleted. (See draft SEPP 66 p.9, Planning Policy p.5 and Recommendation 20).

3.8 Omission: Section 94 plans

We note that the Guidelines (p.54) includes a discussion of Section 94 issues. This should be carried further. A State directive should require councils to revise their Section 94 plans to ensure that developer contributions are allocated to facilities that support the objectives of the draft SEPP. The Guidelines should include information, possibly including a Model Section 94 plan, to assist councils to undertake this revision. (See Guidelines p.54)

We are concerned that existing council Section 94 plans lean toward the provision of car-based infrastructure, such as road upgrading and car parking, whilst overlooking the need for the provision and upgrading of facilities for sustainable transport - footpaths, bicycle lanes, bus stops etc. In a recent project for Hornsby Council, we have recommended that the Section 94 plan be amended to incorporate the funding of sustainable transport infrastructure. (See Recommendation 10)

A barrier to the allocation of Section 94 funds to the improvement public transport services is the need for funds to be transferred from the local to the State level (including public transport service providers). We are, however, aware that South Sydney Council was able to overcome this barrier in allocating Section 94 funds from the redevelopment of the Camperdown Children's Hospital site to the upgrading of services provided by Sydney Buses. In the long term, an agreement, supported by an appropriate policy instrument, should be drafted between local and State government to enable these transfers. (See Recommendation 11)

3.9 Omission: Relationship to SEPP 11

Draft SEPP 66 does not refer to its relationship to the much earlier SEPP 11 and the supporting SEPP 11 guidelines (RTA (1986)). This omission gives rise to questions relevant to the use of SEPP 66, such as its use by strategic and development control planners and the actual role of Councils' Traffic Committees.

Questions include: Once SEPP 66 is introduced, what will be the status of SEPP 11 and the SEPP 11 guidelines? As SEPP 11 and the SEPP 11 guidelines have been reviewed, will there be consultation with groups, such as Bicycle NSW, the Sydney

Transport Panel of the Institution of Engineers, and specialist practitioners in sustainable transport and urban form? What is the timetable for introducing a revised set of SEPP 11 guidelines and will they support SEPP 66?

In early 2000, the initial review of the SEPP 11 guidelines identified a number of areas for change that would be able to support the policy of integrating land use and transport, adopted by NSW Governments since 1995. Such changes are necessary to achieving the desired outcomes of draft SEPP 66, including improved accessibility while reducing private motor vehicle use. In practical terms, this should result in a rise in the levels of walking and cycling, particularly for trips within 5km, and an increase in the share of trips by walking and cycling as well as public transport (where capacity and conditions are sufficient).

For SEPP 66 to operate effectively, several points raised in the initial 2000 review of the SEPP 11 guidelines need to be taken up or resolved.

The first is the value of ensuring that SEPP 66 refers to the whole State, rather than Sydney, Newcastle and Wollongong, as proposed, so that both SEPP 11 and SEPP 66 have consistent joint application. The 2000 review recommended that revisions to SEPP 11 should meet the needs of rural stakeholders and it is only logical that SEPP 66 bring benefits to rural people and towns as well. This issue is discussed elsewhere in this submission. (See Recommendation 15)

The second point is all parts of the Guidelines need to be used to revise the SEPP 11 guidelines. The planning principles for accessible development, listed in Part 1 of the Guidelines, are of direct relevance to the content and revision of the SEPP 11 guidelines. The 2000 review of the SEPP 11 guidelines highlighted the relevance of draft SEPP 66 Principle 4: Link public transport with land use strategies; Principle 6: Improve Pedestrian Access; Principle 7: Improve Cycle Access; Principle 8: Managing Parking Supply. The 2000 review also highlighted the relevance of Parts 3: applying the principles to specific land use types and of Part 4: issues, actions and methods being used in practice to implement the principles established in Part 1.

Thirdly, the 2000 review recognised that the SEPP 11 guidelines do little to counter car dependency in metropolitan areas and regional centres. It recommended that SEPP 11 guidelines be revised to take a travel demand management approach. (See Recommendation 12)

The fourth point relates to identifying car trip rates from types of land uses and methods for conducting travel (traffic) study. We understand that these rates are being reviewed as part of the revision of the SEPP 11 guidelines. It would be helpful for decision-makers if the expected car trip rates associated with different scenarios for development densities and levels of sustainable transport provision were included.

Finally, consideration should be given to the potential for combining SEPP 66 and SEPP 11 and their respective guidelines. (See Recommendation 13)

4 ESSENTIAL ELEMENTS TO ENABLE SEPP 66 TO BE EFFECTIVE

4.1 Streamlining documents

We suggest the four documents be merged into two: (1) the draft SEPP and (2) a single set of Guidelines. This will not only make it easier to use, but will also remove the confusion created by having to refer to several documents in Clauses 8(b) and 9(b) of the draft SEPP. (See Recommendation 21)

We note that some of the diagrams in the Guidelines were not available on the web version. As these diagrams are important, we suggest they be included on the web version. (See Recommendation 22)

4.2 Supportive context

Above we recognised that the draft SEPP needed to be supported by a range of other related legislation, policies and actions. The SEPP Guidelines should list these items and comment on their application to the aims of the draft SEPP. These related documents would include: *Plan First*, *Shaping Sydney*, *Action for Air*, *Action for Transport 2010*, Council bicycle plans, PAMPs, social plans etc. (See Recommendation 25)

Further, the abovementioned legislation, policies and actions should be reviewed to ensure they are fully supportive of SEPP 66 and that there are no conflicting objectives or provisions. In particular, such a review should be undertaken for *Shaping Sydney* and the SEPP 11 guidelines. Councils should be encouraged to do the same with their own plans and policies. (See Recommendation 26)

4.3 Preferred modes

The draft SEPP tends to emphasise buses as the preferred form of public transport. For example, the cover of all reports in the package show buses at an interchange (the train is barely visible). This visual impression is reinforced by the drawings and photos within the Guidelines. This sends a misleading signal.

The most effective role played by each mode should be explained in the Guidelines. It should state that heavy and light rail serves to create a metropolitan network, with walking, cycling and buses feeding passengers to stations. This point is picked up by the quote in the Guidelines from the UK Department of Environment Transport & the Regions (DETR), which says "maximise [the] use of rail". We would like to see an equivalent statement included in draft SEPP 66. (See Guidelines p.10 and Recommendation 27)

The draft SEPP Overview and Guidelines should be clearer on their hierarchy of modes. These documents state that walking, cycling and public transport (sustainable modes) should be given "equivalent if not greater consideration" than cars. This should read: "always be given greater consideration" than cars. The draft SEPP

Guidelines must overtly state and promote incentives for sustainable modes and disincentives against car use (see Vuchic (1999)). This is necessary to counter the long-standing bias in the other direction to ensure that the transport disadvantaged (i.e. aged, youth, car-less, disabled etc.) are more equitably provided for in the future than they are at present. (See Overview p.3, Guidelines pp.4&29 and Recommendation 28)

Further, all documents should clearly state that walking is always the priority mode in all planning. After walking, cycling and public transport are to be encouraged (in that order). This is stressed in UK Department of Environment Transport & the Regions (DETR) policies that guide the preparation of Local Transport Plans. See also Barton & Tsourou (2000) and Tolley (1997). The SEPP should then clearly state that car use is to be discouraged. (See Overview p.3, Guidelines pp.4&29 and Recommendation 29)

We note that in Clause 12(1)(a) of the draft SEPP and on p.26 of the Guidelines the order of sustainable modes is the wrong way around. It should be "walking, cycling and public transport". (See draft SEPP 66 p.11, Guidelines p.26 and Recommendation 29)

4.4 Preferred development

The draft SEPP tends to emphasise greenfields as the preferred form of development. The draft SEPP should stress the importance of giving brownfields and 'greyfields', (i.e. redeveloping parking spaces) priority over greenfields development in the creation of a compact city. In doing this, the Guidelines should focus on opportunities for improving sustainable transport around existing stations whilst these areas are being redeveloped. Such a focus is justified by the fact that redevelopment around stations is fast becoming the predominant form of new development in Sydney. (See Recommendations 30 & 31)

4.5 Training & research

The draft SEPP must be accompanied by funding for training and research. As this draft SEPP represents a major departure from traditional thinking, there will be a need to restructure existing traffic management and urban planning training courses and create new courses to ensure that all relevant professionals have access to continuing education for understanding the draft SEPP's rationale. (See Recommendation 32)

Research projects will be needed to further investigate some of the areas that are currently lacking in the Guidelines (e.g. the best way to move freight sustainably) and to monitor the implementation of the SEPP and recommend further improvements. (See Recommendation 33)

Training and research should be linked to development and policy case studies. For example, the North Eveleigh development (mentioned below) and the recently completed Marrickville Pedestrian Access and Mobility Plan should become the subject of action research and training. (See Recommendation 34)

4.6 Case studies

The Guidelines would be improved by inclusion of information on good (and bad) practice case studies. Whilst Sydney is lacking in recent good practice examples, Sydney's older pre-car city provides us with many examples of draft SEPP 66 in action, e.g. urban villages such as Paddington, Erskineville and the Sydney CBD. In all cases, higher-density human-scale and mixed-use development is focused around quality public transport and car parking is restricted. Inclusion of a greenfields case study (i.e. Rouse Hill) in the draft SEPP is noted.

Inclusion of good practice brownfields development case studies should be the priority - not only because this has become the most significant form of development in Sydney, but represents an area of great opportunity for improved land use and transport integration. There are a few reasonable practice examples (Kogarah, Bondi Junction, Chatswood etc.), but no good practice examples. Most existing examples fail by not restricting car parking and not reallocating sufficient roadspace to pedestrians and cyclists.

Sydney desperately needs a best practice example, i.e. a large brownfields development close to a railway station with reduced car use. An opportunity is provided by the proposed redevelopment of the vacant railway workshops at North Eveleigh for residential and commercial uses. The consent authority, South Sydney Council, recently rejected the initial draft Masterplan lodged by the State Rail Authority largely because of transport issues. The main issues were lack of consideration to pedestrian and cyclist access and the oversupply of parking and consequent traffic generation. As the site is within walking distance of Redfern Station, walking and cycling access can be maximised, car-sharing schemes implemented and parking greatly reduced. Documenting the benefits and lessons learned from such a case study would be valuable in the implementation of draft SEPP 66. (See Recommendation 34)

4.7 Public authority works

Whilst the draft SEPP only applies to private sector development applications (*EP&A Act* Part IV), we recognise that projects with the greatest direct relevance to aims of this draft SEPP are carried out by State authorities and councils (*EP&A Act* Part V). These public authority works range from major rail and road infrastructure projects through to minor (bit nonetheless important) traffic calming works, and urban redevelopment.

At the major infrastructure project level, the draft SEPP should apply to the formulation and assessment of such projects, albeit in an altered form. Whilst *Action for Transport 2010* and *Shaping Sydney* are intended to perform this role, they are not delivering sufficient sustainable transport on the ground, as road infrastructure is always given funding priority at the strategic planning stage. Hence draft SEPP 66 should be applied to major infrastructure projects at the strategic planning (as well as DA) stage with all modes competing for funding according to a set of compact city and sustainable transport principles. US Federal transport legislation such as the *Transportation Equity Act for the 21st Century* (TEA21) should be used as a model

The Premier's Department *White Paper on Infrastructure Funding* may also provide guidance. *Plan First* can also offer guidance on good practice strategic planning. (See Recommendations 53 & 54)

The draft SEPP should also apply to the formulation and assessment of smaller infrastructure projects carried out by State agencies and councils. The draft SEPP should be used by agencies and councils to raise the priority of sustainable transport works such as traffic calming (over traditional 'road works') in their annual budgets. The Guidelines should also be used to ensure that all works are of a high standard. (See Recommendation 38)

5 COMMENTS ON GUIDELINES & SUPPORTING DOCUMENTS

5.1 Planning for pedestrians

Transport NSW is to be commended for its recent seminar with visiting expert on walking, Rodney Tolley. We suggest more seminars like this as there is a developing interest in planning for pedestrians and cyclists among transport, urban planning and health professionals. However, NSW has yet to make available quality training by coursework, e.g. skills in developing PAMPS by as a postgraduate certificate in health sciences, such as physiotherapy and occupational therapy. (See Recommendations 32 & 35)

Signalised intersections near railway stations and in areas of high pedestrian use should be reviewed in order to reduce the delays for pedestrians, cyclists and public transport vehicles. (See Recommendation 36)

PAMPs need to be developed for all local government areas and allocations be made in forthcoming management plans and for their staged implementation. As specialised information, guidelines need to be developed for Councils (and consultants) to develop PAMPs particular as only a few Councils in NSW have PAMPs. (See Recommendation 37)

In addition, options for identifying sources of funding for better provision for pedestrians should be undertaken, since funding is widely regarded as the obstacle facing Councils wishing to improve pedestrian facilities and continuous paths of travel.

5.2 Planning for cyclists

Traffic calming should be undertaken with the needs of all road users, and expressly revise guidance materials to ensure that modifications to the road reserve provide well for safe cycling. Although the Guidelines refer to Austroads' *Cities for Tomorrow*, the chapter on traffic calming does not refer to design for cyclists. Yet some recent traffic calming works, typically roundabouts, in Sydney have made conditions more dangerous for cyclists (e.g. in Parramatta and Randwick). (See Recommendation 39)

Funding is another major concern, as it is for pedestrian provision. Although most Councils now have Bicycle Plans, many Councils have not yet implemented even the first stage, and in some instances Bicycle Plans have become outdated by major road works before any part of the Plan is implemented. PlanningNSW and transport agencies need to work with Councils to identify ways of earmarking a portion of road toll revenue and car parking revenue for expending on implementing Council plans. This need will become considerably greater as the population ages and people need to walk (and for some people, preferably cycle) rather than drive.

5.3 Car parking

Given the fact that effective urban consolidation has been, and continues to be, undermined by the over-provision of on-site parking in all of Sydney's transit-based centres, the draft SEPP needs to be stronger in reducing parking particularly in these centres. The Guidelines state that "consideration [be] given to restricting parking". The language is too soft. It should state that "car parking be restricted at all times in transit-based centres". (See Guidelines p.33 and Recommendation 40)

Naturally, the degree to which car parking should be restricted depends on proximity to public transport nodes. The draft SEPP should make merely nominal on-site parking (loading, disabled parking, kiss & ride etc.) mandatory for all major transit-based centres. The restrictions should become less onerous in defined zones further from the transit nodes. (See Recommendation 41)

Whilst the Guidelines do mention some policies supportive of reduced parking, such as South Sydney Council's *Parking Code*, it should refer to others, such as the existing metropolitan parking levy. It should also mention research and experience in cities where transit-based centres will have little on-site parking, and high flows of pedestrians (and cyclists) are economically, socially and environmentally healthier than those with ample parking. NSW agencies should commission research in this area because some shopkeepers believe that they need parking directly outside their shop for commercial reasons. (See Tolley (1999) and Recommendation 43).

The Guidelines and the SEPP 11 guidelines should explain the need to reduce, over time, existing parking by removing subsidies and converting parking space into active land uses (i.e. 'greyfields' development). This approach is being adopted by the American Planning Association. (See Recommendation 44)

We agree there is a need to "increase [the] cost" of parking. However, this wording may send the wrong message that drivers are making a greater contribution to the cost of providing parking than they are. The wording should instead be "reduce [the] subsidy" to demonstrate to drivers that charging for parking is necessary to recover some or all of the costs of provision. The Guidelines should also mention the parking levy and the potential to expand the areas covered by the statute, particularly because collected funds are invested in public transport infrastructure. (See Overview p.4 and Recommendation 45)

It is not sufficient simply to encourage councils to set maximum parking levels. Our experience with the few parking policies that do set maximum levels is that these

maximum levels are excessive. The SEPP must specify tight numerical maximum levels. (See Overview p.4 and Recommendation 46)

We disagree with the Guidelines stating that commuter car parks "should be located at major public transport nodes" because of the presumption that such facilities lead to increased use of public transport. Locating car parks at stations and other nodes undermines the draft SEPP's objective of intensifying development around the node. All forms of car parking must be restricted around stations if the SEPP's objectives are to be realised. Walking, cycling and buses (and some kiss & ride) should be encouraged as the dominant means of access to stations and other nodes. It is important that planningNSW and Transport NSW liaise with CityRail on this important issue, and review the research studies undertaken in Sydney and elsewhere. (See Guidelines p.39 and Recommendation 47)

It is recommended that the current exemption from Council rates for car parking associated with buildings/land occupied for 'public purposes' (including education, tourism, and recreation etc) be removed since it acts as a further source of subsidy to car driving. We anticipate that this would require amendment of the *Local Government Act* so that such building/land owners are levied and these funds contribute towards Councils costs. These funds should be specifically used to improve urban amenity and sustainable transport, including the implementation of Councils' bike plans and pedestrian access and mobility plans (PAMPs).

The Guidelines term "appropriate lighting" in car parks should be further explained as light pollution is a significant and neglected issue, and car park lighting is a major contributor. Light pollution issues include: loss of 'night sky' for astronomers and city residents; visual blight; energy wastage; impact on sleeping patterns; and security issues around inappropriate lighting. Guidelines on appropriate lighting should be included. They should mention the need for lighting to be oriented downward along well-defined (and patrolled) pedestrian pathways rather than spread across vast areas. Many smaller shaded lamps are preferred over large spotlights and the globes should be both energy efficient and provide an incandescence similar to daylight for security reasons (people need a clear view of potential attackers). (See Guidelines p.39 and Recommendation 48)

5.4 Vehicle sharing

The draft SEPP package should mention the role of vehicle sharing schemes (not to be confused with ride-sharing) in their capacity to reduce the overall need for parking spaces. Vehicle sharing is a useful parking reduction tool that offers positive advantages in allowing a wide range of sustainable transport choices.

Such schemes involve a group of households that can share vehicles as part of a 'mobility package' (including public transport tickets); and these vehicles need to be located within walking distance of their home or railway station. The scheme can be managed by a council, an independent manager or by the householders themselves. Such schemes are operating in cities in Japan, North America and Europe and should be readily implemented in Sydney. Benefits include reduced car use, reduced car parking spaces and reduced expenditure on cars. We have found that developers interested in sustainable buildings, such as Landcom and Lend Lease, are keen to

design for reduced car parking and improved end-of-trip facilities for cyclists. (See Recommendation 49)

5.5 Trucks & freight

We are pleased that the draft SEPP package mentions freight (draft SEPP Clause 2(e)), but would like it to say more about how the freight task can be managed sustainably. The profile of this issue must be raised, especially considering community concerns over particulate emissions, noise and safety issues and the growth of Sydney's freight carried by road.

Infrastructure projects such as the Botany to Campbelltown freight railway line and freight handling facility (under construction) have profound implications for the more strategic 'compact city' objectives of the draft SEPP, apart from the local benefits of taking trucks off urban streets. Note that at the recent EPA *Action for Air* Forum, Mr Michael Deegan reported that the premiers of other states recognise the value of completing this freight line to the Australian economy. We support the early construction of the line and the overall principle of shifting freight to rail wherever possible. (See Recommendations 50 & 51)

The draft SEPP Guideline's design provisions should ensure that service vehicles such as garbage trucks and fire engines can be accommodated on narrow roads. Roads should not be made unnecessarily wide to accommodate these vehicles. (See Recommendation 52)

5.6 Human powered vehicles

Whilst 'sustainable transport' should be defined as 'walking, cycling and public transport' (in that order), there is a range of human powered vehicles that should, and currently do, play a growing role in the total mobility spectrum. These include scooters, skateboards, tricycles, recumbent bicycles, electrically-assisted bicycles, wheelchairs and electrically assisted wheelchairs. The latter two are becoming increasingly important as our population ages.

Most of these vehicles rely on high quality pedestrian infrastructure and a continuous path of travel unimpeded by kerbs, potholes and footpath clutter. Accommodating all of these vehicles will at times require redesign of the road reserve to reallocate space away from cars to human powered vehicles, and to separate pedestrians and slower human powered vehicles from faster human powered vehicles such as bicycles. (See Recommendation 55)

5.7 Car occupancy

Although the draft SEPP should clearly discourage all car use, it should be stronger in discouraging single occupancy vehicles (SOVs) than multiple occupancy vehicles (MOVs), as moving motorists from SOVs to MOVs can reduce VKT. For example, the Guidelines could require Councils to revise their parking code to encourage allocation of prime parking places for MOVs at the expense of SOVs. (See Recommendation 56)

5.8 Accessible development principles

We support the accessible development principles overall, but suggest the addition of two principles. These can be integrated into the existing principles or be stated as new principles. The first should emphasise the need to give priority to redevelopment of existing urban areas (greyfields and brownfields development) over the development of new fringe areas (greenfields development) (see Preferred development section above). Further, these centres should be "transit-based centres" to emphasise the fact that all centres must have a strong transit component. The first principle should thus become "Concentrate in existing transit-based centres". (See Recommendation 57)

We suggest an additional principle: "Communicate access to sustainable transport". High quality information about accessing their site by sustainable modes should be advertised to prospective clients. Information on transport access guides (currently being updated) is available on the NSW Sustainable Energy Development Authority (SEDA) website at <http://www.seda.nsw.gov.au/pdf/TAG310.pdf> (See Guidelines p.41 and Recommendation 58)

We also suggest some minor rewording. To emphasise walking and cycling, the principles dealing with walking and cycling (No.s 6 & 7) should be moved up to 1 & 2 position (see *preferred modes* section above). (See Recommendation 60) "Manage parking supply" should be "restrict parking supply" to emphasise the need to minimise parking (see *car parking* section above). (See Overview p.6 and Recommendation 59)

Further, we suggest that the accessible development principles in the Guidelines be introduced by placing them within a bigger 'sustainable cities' context, such as compact cities and hence the capacity for promoting walking and cycling and public transport to be promoted over car use. (See Guidelines p.7 and Recommendation 61)

5.9 New residential areas

Implementing the draft SEPP will be a challenge for greenfields development as well as existing inner-urban areas. It will be a particular challenge in existing outer-urban areas, particularly the 1980s and '90s cul-de-sac style subdivisions located some distance from railway stations. These areas will require considerable retrofitting to move them away from car dependency. The Guidelines should include a special section on this important issue. Some councils have begun to address this challenge, e.g. Hornsby Council has recently completed a sustainable transport plan for the suburb of Cherrybrook. (See Recommendation 62)

The Guidelines should discuss the need for frequent bus services in greenfields release areas as they are developing. This is instead of waiting for completion, by which time residents have already purchased additional cars and consequently do not use the bus service. Additional funding is needed to subsidise the service in the early stages of development. Further explanation of the fixed costs of cars in contrast to the direct user charges for public transport should be included. Rather than a brief

mention in the Overview, we suggest this important issue be addressed by the Guidelines. (See Recommendation 63)

Accessible Development principle 5, "conventional subdivision", should be defined specifically as 1980s & '90s cul-de-sac style subdivision, as earlier subdivisions adopted more of a grid-pattern that lends itself more easily to sustainable transport. (See Guidelines p.12 and Recommendations 64 & 76)

5.10 Using JTW data

The Guidelines should give greater emphasis on non-peak and weekend travel, as the JTW report states that that work-related trips are only 18% of all trips and a larger share of trips are for recreation, entertainment, sport, passenger trips & shopping. Further, JTW data tends to under-estimate the extent of cycling and walking. Data on non-peak and weekend travel should thus be included and discussed in Guidelines. (See Guidelines p.4, JTW report pp.1&3 and Recommendation 65)

5.11 Gender & cycling

The JTW report states that males ride seven times more than females in Sydney where the disparity is greatest and the level of cycling the lowest among all other capital cities in Australia. This is a point worthy of more discussion. A likely reason is poor and unsafe conditions for cyclists and intimidation of cyclists by drivers, as recently found in a survey of women in Sydney. (See JTW report p.47 and Recommendation 66)

5.12 Use of terms 'accessibility' and 'mobility'

We don't entirely agree with the Guidelines' desire to "maximise accessibility rather than mobility". As mentioned above, this statement implies that all mobility is by car. We believe that accessibility should be maximised, but don't agree that mobility should necessarily be reduced. It should simply occur by sustainable modes. As sustainable mobility leads to improved physical and mental health, we don't want to restrict this.

The term 'accessibility' often refers to being accessible to people with disabilities. On this point, it may be useful to refer to the current development of a new standard for access to premises, that complies with the *Disability Discrimination Act*, under the *Australian Building Code*, as well as to the *Hurstville Disabled Access DCP*.

Internationally, sustainable mobility has become a popular phrase used in recent urban transport policy by organisations supporting a shift towards sustainability (e.g more walking, cycling and public transport use, and reduced car use) including the OECD, the World Bank, the European Union, and the World Business Council on Sustainable Development. (See Guidelines p.1 and Recommendation 67)

5.13 Listing impacts of car use

The Guidelines mention some of the negative impacts of car use and why we must reduce VKT. Whilst this is a good start, the list is not complete - it should include: loss of walkability due to sprawl; loss of bushland due to sprawl; the high cost of servicing sprawl; oil depletion; dividing communities through barrier effect; loss of tranquillity through traffic noise and vibration; traffic related stress; obesity and heart disease from inactivity; social isolation; water pollution from road runoff; and the contribution of car imports to Australia's current account deficit. (See Guidelines p.5 and Recommendation 68)

5.14 Commercial design

We agree with the Guidelines that low density office parks should be discouraged, as they are contrary to design principle 1: Concentrate in centres. We suggest that the draft SEPP treat them the same way as large retail developments, i.e. not permitted out of centres. (See Guidelines p.28 and Recommendation 69)

We agree with statement in the industrial part of the Guidelines to avoid left/right turning and slip lanes and minimise road widths to decrease traffic speeds and so reduce danger to pedestrians and cyclists. We also agree that driveways crossing footpaths should be avoided in the interests of pedestrian safety, and where necessary driveways should be surface-treated and marked to show motorists to give way. These important criteria should be inserted into the residential and commercial sections of the Guidelines. This point highlights the importance of detailed, local level road treatment in promoting sustainable transport. (See Guidelines p.37 and Recommendation 70)

5.15 Austroads references

The Guidelines refer extensively to Austroads' *Cities for Tomorrow*. We are concerned that this Austroads document is not as freely available as it needs to be. Although we could refer to copies in the UTS Library, for example, access may be a barrier to small councils, developers and community groups.

We suggest that the Austroads documents and the other reference be available on the planningNSW website. (See Recommendation 71)

5.16 National Greenhouse Strategy

The Guidelines should note *The National Greenhouse Strategy* includes several land use and transport policies that are relevant to the draft SEPP. It would be appropriate for the aims of the SEPP to refer to the reduction in fossil fuel use. (See Recommendation 72)

5.17 Health and education facilities

The location of health and education institutions is an important issue that deserves more attention in the Guidelines. These institutions represent some of the largest trip generators, so their location near public transport nodes is essential for VKT containment. There are several recent examples of poorly located health and education institutions, highlighting the need to give this issue greater attention. An example is the UTS Ku-ring-gai Campus at Lindfield, and more recent discussion about locating a major hospital in Warringah without a rail link. PlanningNSW should liaise with the Premiers Department, Department of Education and Training, Department of Public Works and Department of Health to reach an agreement on this issue. The use of Crown land, particularly in regional towns, may be a cheap location for the NSW government in the short term, but fails to integrate land use with sustainable transport. The users bear the direct costs of private transport, and all the other disadvantages of car-dependent urban forms result. (See Guidelines p.32 and Recommendation 73)

5.18 Maintenance budget

We agree with the Guidelines statement that maintenance of sustainable transport infrastructure is important, and is an area that has often been lacking to date. Good maintenance of stations, bus stops, bikepaths and footpaths not only makes it safer, easier and more pleasant for people to use these facilities, but sends a signal that governments wish to encourage sustainable modes. We agree that it is important to ensure that a maintenance budget is provided. (See Guidelines p.41)

5.19 Involving the community

We agree with the Guidelines on the need for consultation. Community groups representing disadvantaged groups, such as bicycle user groups, disabled groups and welfare groups, should be involved in formal consultation to ensure their needs are being considered. Councils can also make use of their Social Plans that usually deal extensively with urban amenity and sustainable mobility needs of disadvantaged groups. (See Guidelines p.44 and Recommendation 74)

5.20 Plan First

The Guidelines should mention the role that Plan First can play in improving strategic planning at both the metropolitan regional level through to the local council level. Improved strategic planning will bring improved transport and land use planning and hence will further the aims of this draft SEPP. In particular, *Plan First* offers useful guidance on place management and community consultation. It also offers guidance on monitoring of the performance of plans. VKT, car ownership and air quality indicators should be developed for this purpose. There is also the promise of a regional planning body to oversee much needed strategic planning at the regional level. (See Recommendation 75)

5.21 Glossary

A definition of "sustainable transport" (i.e. walking, cycling and public transport) should be included in the Guidelines glossary. This would simplify the language, make it more consistent and avoid the need to keep repeating these three sustainable modes. We could assist with a definition drawing on other sources, such as the UK Royal Commission on Environmental Pollution.

In light of the above discussion, other terms that should be defined in the glossary are: "transit", "accessibility", "trip generators", "transport access guide" and "conventional subdivision". (See Guidelines p.55 and Recommendation 76)

6 POLICY REVIEWS

We agree that the SEPP should be reviewed with consultation one year from its commencement date. This review should include an assessment of any outstanding recommendations in this submission. The review should consider the appropriateness of the 1,000m² threshold and land uses specified in Clause 7 of the instrument, with a view to capturing smaller developments via a checklist. There should be subsequent and ongoing annual reviews with a view to monitoring its performance in achieving its aims and amending the SEPP where necessary. (See Planning Policy p.2 and Recommendations 22 & 24)

7 RECOMMENDATIONS

On the basis of the above discussion, we suggest the following additions and amendments to the draft SEPP package. As many of these changes as possible should be taken up so that they are included when the SEPP is made. Any outstanding changes should be taken up so they are included after the 12 monthly review. Section references to the above discussion are shown in brackets.

1. Delete ", especially" from Clause 2(c) of draft SEPP. (3.1 Draft SEPP aims)
2. Include links from draft SEPP (Clause 6?) to objectives of other key legislation, plans and policies. (3.1 Draft SEPP aims)
3. Delete the word "solely" from Clause 2(b) of draft SEPP. (3.1 Draft SEPP aims)
4. Insert an aim in Clause 2 that reads: "Minimise travel distances in developments so that people can access many facilities by walking and cycling". (3.1 Draft SEPP aims)
5. Amend draft SEPP Clause 2(e) to read: "providing for the efficient movement of freight vehicles whilst protecting neighbourhoods from noise and other freight vehicle impacts." (3.1 Draft SEPP aims)
6. Insert into Clause 3(2) of draft SEPP "... and consider the movement of people in vehicles as well as vehicles themselves." (3.2 Draft SEPP strategy)

7. Include a statement in draft SEPP package on the need to link NSW Government funding for road maintenance to performance standards for all road users. (3.2 Draft SEPP strategy)
8. Replace reference to four documents in Clause 2(b) with standard heads of consideration (sustainable transport checklist). Include a comprehensive checklist for large developments (>1,000 sqm gfa) and a simplified checklist for small developments (<1,000 sqm gfa). (3.2 Draft SEPP strategy & 3.3 Floorspace threshold)
9. Establish a process for monitoring via data collection prior to the making of the SEPP based on the checklists for small and large developments. (3.2 Draft SEPP strategy)
10. Include in Guidelines a model Section 94 plan for sustainable transport and issue a directive to require councils to amend their Section 94 plans accordingly. (3.8 Omission: Section 94 plans)
11. Develop a standard agreement for the transfer of Section 94 funds from local government to State government public transport providers. (3.8 Omission: Section 94 plans)
12. Revise SEPP 11 and the SEPP 11 guidelines in keeping with draft SEPP 66 and assess public comment on these documents when undertaking the 12-monthly review of SEPP 66. (3.9 Omission: Relationship to SEPP 11)
13. Clarify and make explicit in the draft SEPP its relationship to SEPP 11 and the RTA SEPP 11 guidelines and consider the potential for combining these policies and their guidelines. (3.9 Omission: Relationship to SEPP 11)
14. Amend Clause 7 draft SEPP to capture developments below 1,000 sqm gfa, but subject to assessment against a simplified checklist. (3.3 Floorspace threshold)
15. Amend Clause 5 of draft SEPP to state that the draft SEPP applies to the whole of NSW and include in Guidelines a set of provisions dealing with regional land use and transport integration issues. (3.4 Non-metropolitan regions)
16. Amend Clause 11 of the draft SEPP to give the Director-General of the RTA a consultation role in addition to NSW Transport. (3.5 Agency consultation clause)
17. Ensure staff of NSW Transport and RTA dealing with matters under Clause 11 of the draft SEPP are well trained on use of the SEPP and on sustainable transport generally. (3.5 Agency consultation clause)
18. Include in Clause 8(e) of the draft SEPP a provision relating to mixed land uses. (3.6 Mixed uses)
19. Include in Guidelines a discussion of the pros and cons of mixed uses in suburban areas and information on promoting shop-top housing and corner stores. (3.6 Mixed uses)
20. Delete Clause 10 of the draft SEPP to prevent its use as an 'escape clause'. (3.7 Escape clause)
21. Merge the four draft SEPP documents into two documents: (1) the draft SEPP and (2) a single set of guidelines. (4.1 Streamlining documents)

22. Ensure web version of Guidelines includes all diagrams. (4.1 Streamlining documents)
23. Review the draft SEPP package 12 months after the making of the SEPP and conduct minor annual reviews thereafter. (6 Policy reviews)
24. Consider the appropriateness of the floorspace threshold and land uses specified in Clause 7 of the draft SEPP in all SEPP reviews. (6 Policy reviews)
25. Include in the draft SEPP package an inventory of legislation, plans and policies that can support the draft SEPP and comment on their respective roles. (4.2 Supportive context)
26. Encourage the review of listed supportive legislation, plans and policies to ensure they are consistent with the draft SEPP (4.2 Supportive context)
27. Include in Guidelines a discussion of the roles of each of the sustainable transport modes and the importance of complementarity between modes. (4.3 Preferred modes)
28. Amend where necessary all documents in the package so that they clearly *encourage* (1) walking (2) cycling and (3) public transport (in that order) and *discourage* car use. (4.3 Preferred modes)
29. Amend Clause 12(1)(a) of the draft SEPP to read: "walking, cycling and public transport." (4.3 Preferred modes)
30. Include statements throughout the draft SEPP package to emphasise that greyfields (i.e. redeveloped car parks) and brownfields developments are preferred over greenfields developments in the interests of creating a compact city. (4.4 Preferred development)
31. Include in Guidelines greater consideration of redevelopment around existing railway stations. (4.4 Preferred development)
32. Develop and deliver a professional training package on the draft SEPP and on sustainable transport generally. (4.5 Training & research)
33. Obtain funding for and carry out research projects to monitor and promote the effectiveness of the draft SEPP. (4.5 Training & research)
34. Conduct research on a set of good practice case studies, with a focus on brownfields developments near railway stations, e.g. North Eveleigh. (4.6 Case studies)
35. Convene further workshops with visiting experts on walking and cycling. (5.1 Planning for pedestrians)
36. Include in Guidelines information on changing the phasing of traffic lights to favour pedestrians, cyclists, buses and light rail vehicles. (5.1 Planning for pedestrians)
37. Include in Guidelines information to assist councils and consultants to draft and implement PAMPs. (5.1 Planning for pedestrians)
38. Encourage use of the Guidelines for local level State agency and council works. (4.7 Public authority works)
39. Modify diagrams in Guidelines to better show provision of bicycle lanes. (5.2 Planning for cyclists)

40. Amend Guidelines from "consideration to restricting parking" to "restrict car parking in transit-based centres". (5.3 Car parking)
41. Draft SEPP to enforce tight maximum parking limits in zones around railway stations - most restrictive near the station, becoming less restrictive in zones further from the station. (5.3 Car parking)
42. Include in Guidelines a discussion of the role of the *Parking Levy Act*. (5.3 Car parking)
43. Include in Guidelines reference to overseas studies that show the economic benefits (as well as social and environment benefits) of restricting car parking in town centres. (5.3 Car parking)
44. Include in Guidelines a statement on the need to convert existing parking to active land uses (i.e. greyfields development) in the long term. (5.3 Car parking)
45. Change the wording "increase the cost" of parking in the draft SEPP Overview to "reduce the subsidy" of parking. (5.3 Car parking)
46. Include in draft SEPP mandatory tight numerical maximum parking levels. (5.3 Car parking)
47. Delete the statement in the Guidelines that states that car parks should be located at major public transport nodes. Replace it with a statement that stations should be surrounded by active land uses with restricted parking. Liase with CityRail on this issue. (5.3 Car parking)
48. Include in Guidelines a statement on the need to minimise light pollution and best practice information on lighting of car parks. (5.3 Car parking)
49. Include in Guidelines information on the role of vehicle sharing in reducing the need for car parking spaces. (5.4 Vehicle sharing)
50. Include in Guidelines provisions for the movement of freight whilst protecting residential areas from noise and other impacts. (5.5 Trucks & freight)
51. Include in Guidelines information on current freight issues how the freight task can be managed sustainably (5.5 Trucks and freight)
52. Include in Guidelines information on how service vehicles such as garbage trucks can be accommodated on narrow roads. (5.5 Trucks and freight)
53. Develop a sustainable transport checklist (based on the draft SEPP checklists) for the assessment of major transport infrastructure projects at both the formulation and development assessment stages. (4.7 Public authority works)
54. Use the sustainable transport checklist as a basis for allocating NSW Government transport funds amongst competing modes instead of earmarked funding for a single mode. (4.7 Public authority works)
55. Include in Guidelines reference to a range of human powered vehicles, such as scooters and electrically assisted wheelchairs, and include information on how to best accommodate them. (5.6 Human powered vehicles)
56. Include in Guidelines information on how Councils can revise their Parking Codes encourage multiple occupancy vehicles (MOVs) over single occupancy vehicles (SOVs). (5.7 Car occupancy)

57. Amend accessible development principle 1 to read "Concentrate in existing transit based centres" to give preference to brownfields development already served by public transport. (5.8 Accessible development principles)
58. Include in Guidelines an accessible development principle: "Communicate access to sustainable transport". (5.8 Accessible development principles)
59. Amend Guidelines parking principle to read: "Restrict parking supply". (5.8 Accessible development principles)
60. Amend Guidelines so that principles dealing with walking and cycling (No.s 6 & 7) are given top priority (No. 1 & 2). (5.8 Accessible development principles)
61. Include in Guidelines a "sustainable city" introduction to the accessible development principles. (5.8 Accessible development principles)
62. Include in Guidelines information on the retrofitting, for sustainable transport, of low-density car dependent cul-de-sac style developments. (5.9 New residential areas)
63. Include in draft SEPP a discussion of the need for full bus services to be provided to new release areas at the beginning of the development. (5.9 New residential areas)
64. Redefine definition of "conventional subdivision" in Guidelines design principle 5 as 1980s-90s subdivisions. (5.9 New residential areas)
65. Amend Guidelines and JTW document to include more information on non-work and weekend travel and less on work travel. (5.10 Using JTW data)
66. Include in draft SEPP JTW document a discussion of gender issues for cycling. (5.11 Gender & cycling)
67. Amend the Guidelines statement "maximise accessibility rather than mobility" to "maximise accessibility, maximise sustainable mobility and minimise car mobility." (5.12 Accessibility & mobility)
68. Include in Guidelines a fuller list of reasons why we need to reduce VKT. (5.13 Listing impacts of car use)
69. Include in the draft SEPP provisions to treat low density office parks the same as large shopping malls, i.e. not permitted outside centres. (5.14 Commercial design)
70. Include in Guidelines detailed information on roadway treatments for sustainable transport for residential, commercial and industrial areas. (5.14 Commercial design)
71. Include on the planningNSW website the Austroads documents and other publications referred to in the Guidelines. (5.15 Austroads references)
72. Include in the Guidelines information on the NSW Government's response to *The National Greenhouse Strategy*. (5.16 National Greenhouse Strategy)
73. Include in the Guidelines a discussion and information on the importance of locating health and educational facilities within existing centres. (5.17 Health & education facilities)
74. Target cycling, pedestrian and disadvantaged groups such as disabled groups in future formal consultations. (5.19 Involving the community)

75. Include in Guidelines reference to the role of *Plan First* in improving strategic planning of land use and transport. (5.20 Plan First)
76. Include definitions of "sustainable transport", "transit", "accessibility", "trip generators", "transport access guide" and "conventional subdivision" in the Guidelines glossary. (5.21 Glossary)
77. Expand the Bibliography in the Guidelines to include ISF references (8 References)
78. Include in the Bibliography in the Guidelines information on how and where to obtain references. (8 References)

8 REFERENCES

Whilst the bibliography to the Guidelines is comprehensive and useful, it should be improved by stating where each of the references can be obtained and by including some or all of the following. (See Guidelines p.57 and Recommendations 79 & 80)

- Australia Cycling: The National Cycling Strategy, <http://www.dotrs.gov.au/abc/>
- Australian Building Codes Board, Building access and policy Committee, working on amendments to the Building Code of Australia as part of a Disability Discrimination Act Standard on Access to Premises
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- CIVITAS (City-VITALity-Sustainability) 2001 - Sustainable Cities, <http://civitas.barcelona2004.org/>
- Crawford JH (2001) *Car Free Cities*, International Books, USA, see also <http://www.carfree.com>
- EPOMM (European Platform on Mobility Management) News. Issue on Mobility Management and Landuse, 4/01 p.6
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- Hass-Klau C et al (1999) *Streets as Living Space: Helping public places play their proper role*, Kennington, London
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- Newman & Kenworthy (1999) *Sustainability and Cities: Overcoming Automobile Dependence*, Island Press, Washington DC
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- 'Planning Policy Guidance Note 13: Transport', March 2001, and at <http://www.planning.detr.gov.uk/ppg/ppg13/index.htm>
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- World Health Organisation (WHO) (1999) Charter on Transport, Environment & Health, <http://www.who.dk/london99/transporte.htm>