



Action for Public Transport (N.S.W.) Inc.

P O Box K606
Haymarket NSW 1240
19 December 2014

Greenfield Housing
Department of Planning and Infrastructure
NSW Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Draft Leppington Precinct Plan

Action for Public Transport (NSW) is very happy to see that the Glenfield to Leppington rail line is nearing completion before the proposed rezoning of the Leppington Precinct is decided upon, and well before residents will move in. We hope that this represents a new paradigm for urban development in Sydney.

Objectives and assumptions

The American suburban paradigm that took hold in the middle of the last century has demonstrably failed Sydney. The suburbs built from the 1950s right up to the present day have been car-dependent; they were planned that way from the outset. If public transport was thought about at all, it was it seems assumed that services would materialise as the population grew.

A second flawed assumption made in earlier planning schemes was that of “containment”, namely that jobs would follow the population and that workers could and would work close to home. It was expected that this would lead to lower VKTs and shorter commute times. That is not what happened.

The assumption of containment was always unrealistic, and has become completely unsustainable with the collapse, or abandonment, of Australian manufacturing industry. There will be some local service jobs that can be filled locally. Well-paid, higher order jobs however draw their workforce from across the metropolitan area and beyond it.

Even within the same household, husbands, wives, and offspring are likely to work or study in different locations, and they may well change jobs for career advancement. This is not a dynamic to be resisted, even if that were possible. There will therefore inevitably be high levels of travel from Leppington and the areas already rezoned (Emerald Hills, Gledswood Hills, Austral) to destinations outside the region.

“Business as usual” would see RMS “predict and provide” for the vast majority of this travel to be by private car. These road plans would then be faithfully reproduced in the land use “plan”. The

negative social, economic and environmental consequences of this well-worn path are well known and well documented.

“Business as usual” has delivered crippling traffic congestion across Sydney and can only make things worse. The AECOM Transport and Access Strategy (p. ii) notes that “public transport and active travel uptake will be critical to reducing the pressure on Camden Valley Way and other north/south road corridors in 2036 to ensure the ongoing functionality of the road network”. Inadequate attention to public transport also contributes to high levels of unemployment in the West and South West of Sydney, significant health problems and a loss of productivity. The life opportunities of residents of newer areas are not as rich as they could be.

The Leppington line is a great first step in the right direction, but more is needed. The task now is to maximise patronage on the Leppington line by maximizing the access of potential passengers to it. For the most part this will mean the provision of fast, frequent, and comfortable feeder bus services. The next question is of course: where to from there?

Linkages

Attempting to scatter jobs across the Cumberland Plain in the hope that they will connect with local workers will not work. The best approach is to *connect* growing suburbs to clusters of higher order jobs, in locations that are highly accessible by public transport. The same is true of opportunities to attain the higher levels of skills and education required for the jobs of the future.¹

The biggest concentration of these opportunities at present is in the Sydney CBD, but the South line to the CBD is heavily congested and journey times are long.

On the other hand, congestion is less acute on the Cumberland line between Glenfield and Parramatta and predicted to remain so in Sydney’s Rail Future (Figure 3 page 8). Parramatta has a large and growing employment role and been formally designated as a second CBD. There is also a significant concentration of higher order jobs, a university and other activities in the Macquarie Park area (which is not shown on Figure1-1; we argue it should be).

In our view there would be great benefit from dramatic improvements to public transport from the South-West to Parramatta and connecting to the Macquarie Park area, using the new Leppington line. *The heavy rail Parramatta to Epping link should be reinstated and completed as a matter of highest priority.*

Shortcomings of the draft Leppington Precinct Plan

Traditional planning and engineering approaches make life very difficult for bus passengers and bus operators, dampening patronage. This will in turn both dampen patronage on the Leppington line, and induce car traffic and parking demand.

There are some remnants of the old ways of thinking in the planning documents that are currently on exhibition. We urge that these shortcomings be addressed and removed before any rezonings proceed:

1. Bus service plan unconfirmed

The Leppington Precinct Planning Report at p.viii says: “infrastructure availability is the key determinant of when land can develop”. It wasn’t always unthinkable to rezone land for

residential use without water and sewerage, and even road access, but it is now, as the report makes clear.

There is recognition that “servicing the precinct will require investment by Government in water, sewer, power and road infrastructure” (p. xi). The same is true of public transport. In our view this must become the norm for public transport too.

Public transport is essential infrastructure.

The timely construction of the Leppington rail line indicates a shift towards recognising this, but more certainty is needed about bus services before parts of the precinct beyond walking distance of the station are rezoned.

The Leppington Precinct Planning Report refers to the South West Sector Bus Servicing Plan released in February 2009 by the Ministry of Transport and reports that “a review of the Strategy is currently being undertaken by Transport for NSW, including details on how bus services will integrate with the SWRL project” 4.1.5 p.20- 21).

The level of service mooted for bus passengers in the 2009 South West Sector Bus Servicing Plan is very low outside peak hours. The expectation that it is acceptable to expect passengers to walk 800m to access non-peak bus services² is unreasonable in an area where high summer temperatures are common. In our view the current review must provide for high levels of service throughout the day and on weekends if the patterns of the past are to be broken.

We note that Ingleburn station is only 6km from the precinct and no services are shown in the Transport and Access Strategy’s description of possible future services (p.40).

The Leppington rezoning should await the results of the Transport for NSW review, and that review should be publicly exhibited for comment. Rezoning should also await certainty about the funding and therefore the actual availability of bus services. Lines on a map do not constitute a service.

2. *Design of roads and streets*

The walkability and safety of the streets of the new suburb is critical for public transport users, who make at least part of their journey on foot. The DCP contains a number of general statements supportive of this aim (3.2.3 p.44). There is recognition of the need for fine grain, short blocks and mid-block connections (AECOM p.iii, DCP 5.2.2 p.118). There are references to design principles for crime prevention.

All of this is encouraging, but if these principles are not translated into road designs and actual controls, they are nothing more than exhortations.

There are instances in which there is an uncritical adoption of road engineering standards geared towards car travel, and these have strong potential to render the streets of Leppington unfriendly to pedestrians. For example:

- The first of the plans shown in figure 3-2 (DCP p.43) shows a long block.
- Culs-de-sac are to be “used only where other more permeable options are not available” (AECOM p.46), but the diagram on p.58 of the DCP shows a cul-de-sac

with no pedestrian pathway through at the end. Any person hoping to reach a bus stop has a very long and circuitous walk ahead of them.

- Car parking standards and the abhorrence of battle-axe blocks (p.58) will promote a proliferation of driveway crossings.

No wonder the poor pedestrian shown in figure 3.5 looks downcast. To make matters worse, he is “sharing” the footpath with a bicycle.

The proposed cycle path system is mooted to run through open space, which suggests cycling is seen as a recreational pursuit not as a means of access to the new Leppington station. The AECOM Transport and Access Strategy (p.46) notes that commuter cyclists prefer direct routes. Direct routes, separated from both motor vehicle traffic and pedestrians, can easily be designed in at this early stage.

The road designs and planning controls need to be critically reviewed to ensure they genuinely support the aims and principles set out in the supporting documents and to weed out any that do not. A specific walk score (above 80, a score achieved by both Hurstville and Harris Park) should be targeted for the precinct <http://www.walkscore.com/> and supported by road and street design.

3. *Density and development standards*

The Leppington Precinct Planning Report says that the SEPP amendment will “make more efficient use of existing infrastructure and services; reduce the consumption of land for housing and associated urban development on the urban fringe; and be adequately serviced with improved urban infrastructure” (p.82).

We appreciate that the DCP seeks to move to *minimum* residential densities, but the densities are worryingly low. 88% of the precinct is devoted to low-density housing, defined as between 12.5-20 dwellings/ha. The minimum in area R2 is a mere 15 dwellings/ha (p.85). Medium density is defined as between 20-40 dwellings/ha and the minimum proposed for R3 is just 25 dwellings/ha.

We note that the Housing market analysis has “reduced the amount of medium density which is feasible” (p.87). We do not have any reason to doubt that analysis – but we cannot see the necessity to prohibit a form of development that is considered unlikely to be proposed.

We suggest that the excessively low densities could be increased without assuming the construction of any more medium density housing, by a serious review of the contents of the development control plan, including:

- Street widths – see earlier comments on road network planning
- Front and side setbacks (p.74, p.96); these should not work against the provision of townhouses, villa units and cluster housing, all of which are low impact ways to increase density.
- Carparking requirements. The notion that “environmental living” requires a triple garage is positively Orwellian (point 16, p76).
- Open space standards. We fully appreciate the benefits of private open space but we wonder why shop top housing would require “communal open space” (DCP p.100).

The designation of an area close to the station for a Business “park” will not make proper use of its location if it conforms to the development standards appropriate for a business “park”. This is entirely the wrong typology; business parks are by their nature impermeable to pedestrians and walking distances are needlessly long.

Conclusion

APT NSW applauds the construction of rail access to Leppington in advance of this proposed rezoning. To make the most of this opportunity to create a livable and sustainable new neighbourhood we advocate:

- Delaying rezoning until Transport for NSW finalises its review of bus planning and funding commitments are in place;
- Reinstating and completing the Parramatta to Epping rail link, to give access to residents of the South West release areas to employment and educational opportunities in Parramatta and the Macquarie area;
- Reviewing the DCP and the road network to ensure they do in fact support the stated aims of increasing walking, cycling and public transport use. Conventional road planning standards should not be uncritically adopted;
- Densities should be increased, not by increasing medium density housing but by critically reviewing the amount of land devoted to asphalt, and removing obstacles to low impact options like terrace housing, town houses, and cluster housing.

Footnotes

¹ See Better Public Transport. Better Productivity. PwC report for TTF November 2014

² AECOM Transport and Access Strategy p. 37

Jim Donovan
Secretary
Action for Public Transport (NSW) Inc.