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To:

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## **BIKESYDNEY'S RESPONSE TO THE DRAFT CITY PLAN**

### **Introduction**

BIKESydney is an incorporated not-for-profit community organisation.

We want to live in a city:

- Where riding a bicycle is part of everyday life
- That is vibrant, healthy, productive, creative and robust
- That values community, mobility, health, wellbeing social equity and sustainability
- Where people of all ages can make easy choices to ride a bicycle, walk and take public transport.

We advocate on behalf of our members and people who ride bicycles who live and work in the City of Sydney local government area. We are affiliated with Bicycle NSW.

Overall BIKESydney is very supportive of the Draft City Plan which we view as a progressive and ambitious planning instrument. We do have some concerns with elements of its constituent ***Draft Sydney Local Environmental Plan 2011*** (LEP) and ***Draft Sydney Development Control Plan 2010*** (DCP) and encourage the City of Sydney to review these items.

## Recommendations in response to the Draft Sydney Local Environmental Plan 2011 (LEP)

### Part 2 - Permitted or Prohibited Development

BIKESydney recommends that the **Land Use Table** also explicitly include “cycleways” or alternatively, “active transport corridors” as infrastructure which may be “permitted without consent”. The LEP already explicitly includes the category “roads” for example.

### Part 6 - End of Journey Facilities for Bicycle Riders

While BIKESydney is not best placed to prescribe the response, we envisage that rather than only the offer of additional floor space, there should exist a graduated *range* of incentives to developers in order to entice also the “small” elements of progressive development. We urge the City to be creative with incentives in order that it have more influence in garnering more progressive constructions. What other incentives are there for developers?

### Part 6.7 and 6.11 - End of Journey Floor Space

While generally very supportive of the End of Journey Floorspace provisions, we are concerned by **Sections 6.7.3 (b)** and **6.11.3 (b)** which necessarily limit access to end of trip facilities to occupants of the buildings in which the facilities are provided. While access to these facilities should be prioritised for occupants of the building, we believe it unnecessarily restrictive to limit use of the facilities to **only** the occupants of that building. We recommend that this restriction be removed.

The lack of end of journey facilities for bicycle riders is currently a deterrent to people cycling to work. The City of Sydney’s Sydney Cycling Research in November 2009 found that lack of end of journey facilities at work deterred 20% of infrequent cyclists, 14% of potential cyclists and 13% of non cyclists from cycling to work. BIKESydney frequently hears anecdotal evidence to support this research and the experience of people who currently ride to work is that end of journey facilities in the CBD and villages are scarce. In these still early days of encouraging more people to cycle to work, end of journey facilities should be made as accessible as possible to the wider public. Large scale developments are rarely immediately fully tenanted and access to end of trip facilities within developments could and should be open to people working nearby while there is low demand from occupiers. Indeed, there is great potential for community-building in doing so, and allowing flexible access to the facilities has the potential to encourage more people to cycle to work.

## Part 7.20 - Car Parks

BIKESydney urges the City to minimise on-street parking in precincts of high human occupation.

“Car door lanes” (bicycle lanes situated immediately adjacent to lanes of parked cars) are a significant impediment to the uptake of cycling. Approximately 40% of cycling injuries relate to “car doorings”. The road is a valuable resource for the **movement of people**, and is often wasted on the storage of vehicles. (The City has already embraced this progressive view as exemplified by its Memorandum of Understanding with the State Government which seeks to remove on-street parking from critical city thoroughfares due to the severe, disproportionate impact on peak hour bus flows caused by only a few parked cars.)

BIKESydney recommends that **Section 7** of the DCP encourage **all** developments to:

1. capture all its vehicle parking provision **within** the building envelope and
2. provide all its parking provision below street level where feasible (as is the current practice in Copenhagen, for example).

The second of these objectives is well captured in **Part 7.20(d)** for example, but unfortunately this clause applies only to “car parks” and does not extend generally to all - or at least, most - other development types as we think it should.

**Part 5.3A** of the DCP could be amended to entice developers accordingly.

It is to be made clear that this recommendation does not seek to **increase** the provision of parking, but merely to bury that amount of parking deemed appropriate for the development underground where possible.

### Dictionary

The dictionary should include a definition for what constitutes a “cycleway” so as to prevent the delivery of sub-standard cycleway components as may be required of developments adjoining existing or future proposed active transport corridors.

## Recommendations in response to the Draft Sydney Development Control Plan 2010 (DCP)

### 2.1.9.2 Through-Site Links

BIKESydney supports the provision of through-site links as permeability is an important - and much overlooked - element in encouraging active transport. We are concerned that the provision for through-site links is limited to only those areas identified on the Through-Site Link Maps rather than enshrined as a development principle generally. The priority of the links specifically identified may likely change in time in accordance with the trend toward more active forms of mobility. The City would be better served to develop more flexibility within the network by requiring large developments to provide through-site access by default.

We also recommend that for increased flexibility the City amend the current wording of this section as follows:

- (2) Through-site links which connect one publicly accessible place to another publicly accessible place are to be provided on sites:
  - (a) greater than 5,000sqm in area;
  - (b) with parallel street frontages greater than 100m apart, **or**
  - (c) where the consent authority considers that the site analysis indicates the need for or desirability of a pedestrian **and/or cycle** link.

### **2.2.3 Lanes**

As with through-site links, laneways provide permeability and low-traffic routes through the city. Continuous access is of high important to bicycle riders. Bicycle couriers use laneways through the CBD to access delivery areas to buildings.

BIKESydney recommends that the City undertakes a survey to identify the laneways used by cyclists for work and transport and prioritise their continued access. We recommend that the findings be included on the appropriate DCP maps so that access for cyclists can be considered when considering developments on these laneways.

We also recommend that bicycle riders be specifically referred to in **Section 2.2.3.2** to ensure access is provided where appropriate and that bicycle riders are considered as important users of laneways.

### **2.15.3 Bike Parking and Associated Facilities**

The provision of bike parking in new developments is essential to cater for both established and “would-be” cyclists.

We recommend the City reviews **Table 2.6 On-site bike parking rates** to ensure that all types of developments are captured. Table 1 (Section 7.5) of the NSW Government’s “*Planning Guidelines for Walking and Cycling*” [Dec 2004] would serve as a good guide for identifying other land use categories that should be included in the DCP. In its current form, **Table 2.6** of the DCP omits significant cycling trip-generating land uses such as markets, cinemas and theatres, amusement centres and bowling alleys, fun parks, small bars, banks, take away food shops, sports arenas, gymnasiums, community halls, and primary and secondary schools for example.

We also recommend that the rates calculations in **Table 2.6 On-site bike parking rates** be amended so that significant trip generators are always required to provide at least one parking space for visitors indeterminate of the size of the development. This would include Clubs and Pubs, Swimming Pools, and Ancillary Retail.

### **2.15.5 Service Vehicle Parking**

BIKESydney recommends that the City strengthens the provision of service vehicle parking for bicycle couriers by specifically requiring the provision of bicycle parking in service vehicle areas.

### **9.4.3 Bicycles**

BIKESydney recommends that the City strengthen this section to better protect the interests of bicycle riders. We recommend the inclusion of a statement similar to that provided in **Section 9.4.4 Pedestrians**.

*The procedures and key parameters relating to the bicycle network which must be addressed in the preparation of a Transport Impact Study include:*

- (a) identification of cycling routes and existing cycling desire lines;*
- (b) flows of bicycle traffic and potential conflicts with vehicles, particularly where such conflicts cause capacity constraint on either vehicular, pedestrian or cyclist movement; and*
- (c) cycling infrastructure.*

*The assessment of the cycling network should extend beyond the site to include areas within at least 50m of the subject site boundary, and incorporate both sides of any roads within this zone.*

Again, we are much encouraged by the City's progressive approach to its draft City Plan. Please feel free to contact us should you require any clarification or wish to discuss other matters.

Yours sincerely

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