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BIKESydney's Submission to Leichhardt Council's Draft Development Control 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 inner Sydney area.

Preamble

Our submission is motivated by the desire to train Council's focus on the "positive provisioning" required to bring cycling - and by association, walking - infrastructure up to modern standards. The proper provisioning for active transport depends on "catch-up" planning interventions.

The objectives expressed in Council's draft Development Control Plan ("the DCP") give due recognition to the role cycling can play in the service of Council's *Leichhardt 2025+* Vision, however the DCP falls somewhat short in enshrining in its controls a suitable execution plan. Our submission focuses on bridging this gap between the DCP's objectives and controls in respect of cycling.

We believe our recommendations will improve amenity, safety, equity and happiness as well as the local economy.

We urge Council to undertake a review of Leichhardt's Bicycle Plan with a view to enshrining within the DCP controls that serve the outcomes sought in it.

Acknowledgment

We wish to acknowledge that Council's DCP is a progressive document and the statement of its objectives, indicates a clear intention to prioritise active transport modes over personal car use. By way of example, we are particularly supportive of the inclusion of the following provisions within the DCP:

B1.1 Connections

Objective 11 - Council seeks to support urban design that accommodates active travel options such as walking, cycling and public transport between homes, centres and attractions so that people can be better connected to each other and places.

C1.11 Parking

Objective 4 - To integrate bicycle parking into developments so that cycling is a viable transport alternative

Note 1 to Table C5 (Parking Rates)

1. The maximum rates [of parking] are provided as a move towards reducing private car dependency

Specific Recommendations

The following section outlines our recommended changes to the text of the DCP. our recommendations are contained to only Part B (Connections) and Part C (Place) of the DCP.

Recommendations in relation to Part B - Connections

Section B1.1 - Connections

With 14 objectives identified, leaving section B1.1 devoid of controls misses a significant opportunity to impress upon future developments their responsibility to provide connected urban form.

We recommend that Council include at Section B1.1 controls aimed at ensuring that development necessarily provides safe, connected and legible active transport paths, and that active transport modes be prioritised over personal car usage.

Section B2.1 - Planning for Active Living

Amend second paragraph of "Background" to include the words "...cycle-able" (or if preferred, "rideable"), thus:

"...designing urban spaces to be safe, walkable, cycle-able, and connected...."

Insert a new control:

C7 - Council supports development that prioritises active travel over personal car use."

Section B3.1 - Social Impact Assessment

This section neglects to support its well-directed objectives with controls.

In the minimum, Section B3.1 should express the control to have Social Impact Assessment address the requirements of *Leichhardt 2025+* vision explicitly (not merely tacitly).

Recommendations in relation to Part C - Place

Part C - Section 1 - General Provisions

The second paragraph should include the word "cycle-able" (or if preferred, "rideable") , thus "...promote urban design that produces walkable and cycle-able neighbourhoods..."

Section C1.1 - Site Context and Analysis

Objective O1 - Insert new subclause:

"f. existing and potential active travel networks and connections, including potential links that could be furnished by the development"

Section C1.7 - Site Facilities

Control C6 should have removed the specificity for the storage space to be external to the building envelope. While often, storage will be most easily provided external to buildings, the DCP should leave open the possibility for developments to provide multi-purpose storage spaces internal to building. Particularly in the Leichhardt LGA, there is a significant number of people who own bikes that are too expensive to leave in outdoor areas.

We refer Council to BIKESydney's submission to the State Government's SEPP65 review process, in which we present the case to mandate that developments include multi-purpose storage spaces that can accommodate bicycles. Our SEPP65 submission can be viewed at:

http://bikesydney.org/new10/wp-content/uploads/2012/02/BIKESydney_SEPP65-Submission_web.pdf

and is also attached here as Appendix A.

Here, we present our recommendations as guiding principles rather than as prescriptive clause amendments in order to invite Council's participation in the framing of clauses suitable for inclusion in the DCP. These recommendations are drawn from pages 13-16 of our SEPP65 submission.

Multi-purpose storage

Storage within developments should be multi-purpose and inclusive. Adequate storage is not just useful for bicycles, but also for a range of other essential items such as prams, wheelchairs and sporting equipment.

Secure and safe

For residents, bicycle storage should be safe and secure, preferably undercover and caged with security access to deter theft.

For visitors, bicycle storage should be secure, visible, easy to access and preferably protected from the elements.

Accessible

Storage facilities should be easily accessible, which includes:

- level access from street or footpath;
- conveniently located (eg. close to access doors and lift wells);
- entry ways should be wide enough to accommodate easy access;
- lifts in multi-storey buildings should be large enough to easily accommodate bicycles as well as other residents, and
- clean access (i.e. access to storage is through a wet area, such as a non-carpeted entry way).

Visible and attractive

Storage should enhance, and not detract from, the aesthetics of the building and its surrounds.

Creative

Storage should encourage better use of under-utilised spaces eg. roof spaces, under stairwells and in height corridors.

Flexible

Bicycle storage should be made to be easily scaleable if demand grows.

Co-located with other infrastructure

Consideration should be made of co-locating storage with a communal service bay for cleaning and conducting basic bicycle maintenance.

Section C1.9 - Safety by Design

Control C1(e)(ii) - insert "...and bicycle"

"external lighting is provided at the main pedestrian **and bicycle** entranceways to a building and all communal areas"

Section C1.11 - Parking

Objective O2 - Change “should” to “must”

“Priority **must** be given to the needs of pedestrians, disabled people and cyclists above the needs of the car...”

Objective O5 - Insert "and cycle-able"

“To implement best practise management of parking and promote walkable **and cycle-able**, mixed-use neighbourhoods.”

Objective O12(a) - amend to shift emphasis from mere encouragement to requirement

“Vehicle access, manoeuvring and parking will:

be designed to prioritise ~~a achieve a balance between encouraging~~ public transport, pedestrians [sic] and cycling and catering for the needs of on-site residents and their visitors; ”

Control C2(d) - Insert "and cycling"

“provide clear, safe, direct, legible and well lit pedestrian **and cycling** routes through the parking area....”

Control C4 - Amend to “prioritised”

“on-site parking areas must be designed and constructed to ensure that the movements of pedestrians and cyclists **are prioritised...**”

Control C13 - Insert new subclause

“f. The proportion of trips induced by the development that could be taken by bicycle.”

Control C20 - Insert “prominently”

“Bicycle storage facilities which are to be incorporated into any retail or commercial area are to be located **prominently** in or immediately adjacent to the edge of the main shopping area...”

Control C24 - Amend to "must explicitly address"

"Travel plans can be developed for both residential and non-residential developments and **must explicitly address:...**"

Control C24(d): Amend for focus on bike facilities, not merely a bike-share scheme

"bicycle facilities including explicit consideration of a site-specific bike-share scheme"

Control C25(a) - Amend "50 residential units" to "10 residential units"

Control C26(c) - Insert "and their delivery deadlines"

"...which outlines the measures to be implemented **and their delivery deadlines...**"

Control C44 - Insert "(excluding bicycle parking)"

"Where a site has access to a rear lane/road, vehicle parking (**excluding bicycle parking**) is to be provided from that rear road only..."

Control C45 - Add new sub-clause

f. it is subordinate to the development's bike parking and access obligations

Control C46 - Insert additional sentence

"All ramps for vehicle crossings must be made flush with the road surface (ie. provided without a lip ("bullnose") at the road surface) subject to drainage requirements."

Control C51 - Insert "and cycling"

"Vehicle access, manoeuvring and parking has a design and gradient that enables safe universal pedestrian **and cycling** access from the street."

Section C1.6.1 (page 55) - General Vehicle Parking Rates

There appears no justification for Table C5 to specify non-zero minimum parking rates. There are now developments in nearby local government areas including the City of Sydney and Canada Bay that provide multi-bedroom residential units without parking spaces attached. All entries in the second column of Table C5 (Residents > Minimum) should read "Nil". Doing so, does not limit the developer in any way but does open the possibility for car-less households which Leichhardt desperately needs to encourage as large sections of the LGA are now already over-parked.

(Insert new section) Section C1.6.6 (page 59) - Minimum Bicycle Parking Dimensions

Bicycle Dimensions

The minimum dimensions for envelope clearances for bike parking must be as follows.

Table C10: Minimum Bicycle parking Dimensions

Storage dimensions	
Standard bicycle dimensions	
Handlebar height	0.75 - 1.10 m
Handlebar width	up to 75 cm
Bicycle length	1.5 - 1.8 m
Minimum storage dimensions	
One standard bicycle	
Height	1200 mm
Width	1000 mm
Depth	2000 mm
Door Aperture	780 mm
Two standard bicycles	
Height	1200 mm
Width	1500 mm
Depth	2000 mm
Door Aperture	780 mm

Section C1.13 - Open Space Design Within the Public Domain

Objective O1 - Add new subclause

“h. prioritises sustainable transport modes”

Control C1 - Insert new subclause

“j. sustainable transport”

Control C4 - Insert “and include provision for for both walking and cycling.”

“When the open space is proposed to ~~be~~[sic] function as a link to unite two larger areas of open spaces within the public domain, the linear park will have a minimum width of 10m **and include provision for for both walking and cycling.**”

Control C12(d) - Insert "...and cyclists"

“area required to practically implement foreshore access for pedestrians **and cyclists** and maintenance requirements;”

Control C15 - Amend to "shared path"

“Where a street or approved shared zone will not be located adjacent to open space a **shared path** ~~footpath~~ is to be provided at the interface of the development and the open space.”

Section C1.15 - Signs and Outdoor Advertising

Objective O4 - insert "or on walking or cycling routes"

“Discourage poorly sited signs, particularly signs placed above awnings or at the roof or parapet line on walking or cycling routes”

Control C2(f) - insert “cycling”

“amend as "pedestrian, cycling not obscure pedestrian, cycling or vehicle sight lines...”

Control C26 - insert new subclause

“e. must not obstruct walking or cycling access ways”

Section C1.18 - Laneways

Laneways provide a primary opportunity to provide permeability for people who ride. This is particularly the case in the Leichhardt LGA where the opportunity for a cycleway network is so heavily captured within the network of roads (rather than through green corridors). Even the proposed Whites Creek cycleway will have to be delivered mainly as an on-road (albeit, back laneways) facility.

Laneway access is also vitally important in the encouragement of riding as bikes are often stored in the backyard of a residential building. Being required to carry a bike through the house to exit via the front door is often an impediment at the moment of choosing to use a bike over other modes for local trips.

It is inconsistent with the stated aims of 2025+, LEP and DCP that council should favour development that promotes personal car use. Council cannot justifiably mandate the preservation of on-street parking, and particularly so where development has the ability to capture its vehicle parking burden within its own site. There is no reason for Council to mandate the protection of on-street parking.

Control C16 - Delete "...or remove on-street parking"

"Development does not result in increased laneway parking ~~or remove on-street parking.~~"

Control C18 - potential typographical error. This control likely should refer to C1.11 (not C1.6).

Pedestrian Access

Amend title to "Pedestrian and Bicycle Access"

Control C19 - Amend to "...a separate door for pedestrian and bicycle access" and "...safe pedestrian and bicycle access..."

"Where an additional lane fronting dwelling is provided, **a separate door for pedestrian and bicycle access** is provided directly from the lane and **safe pedestrian and bicycle access** is provided along the laneway to a road or to a 10km/h shared zone, if provided."

C1.21 Green Roofs and Green Living Walls

Section C1.21.1 Green Roofs

It is not clear on what grounds Council is seeking to preclude general rooftop access, but in expressing this objective, Council is missing a very significant opportunity to provide useful space for storage (including bike and car parking) , passive recreation and edible gardens. If it is that Council has particular concerns attaching to providing rooftop access (eg, safety) then it should amend the Objective with regard for that specific concern, not mandate a universal exclusion of using rooftop spaces. The City of Sydney is presently championing the use of rooftop spaces for many communal purposes extending even to providing rooftop cinemas. The potential to use rooftops will much improve amenity, liveability and the profitability of developments.

Objective O9 - Delete or amend with more specific statement of control sought.

Control C1 - Delete this control or qualify specifically for any specific concerns (eg, safety).

Part C - Section 2 - Urban Character

Section C2.2.4.2 Nanny Goat Hill Distinctive Neighbourhood

Noting that the prolonged effort over many years to win cycling provision along within the Balmain Rd corridor has been unsuccessful, it is recommended that Council develop an alternative route (even if less direct and with a much reduced level of service for cyclists) that incorporates the un-named laneway that parallels Balmain Rd between Helena St and Grove St, and continues east to Maida St and Fred Lane. This route could be made viable with small planning interventions that could be directed by the DCP.

Add new Control C15

“C15 Development must enhance through-site permeability for pedestrians and cyclists, with specific regard for the laneways corridor incorporating the un-named laneway south of, and parallel to Balmain Rd between Helena St and Grove St, Maida St and Fred Lane.”

Section C2.2.5.2 Easton Park Distinctive Neighbourhood

Add new Control C16

“C16 Preserve the potential for walking and cycling access to the Rozelle Marshalling Yards.”

This is in light of the likely future development of the Rozelle Marshalling Yards.

Add new Control C17

“C17 To ensure that any development does not overwhelm the capacity of laneways, specifically with regard for pedestrian and cycling access.”

[Note that this is consistent with Control C2 on p337 of the draft DCP]

Section C2.2.5.3 Callan Park Distinctive Neighbourhood

Add new Control C16

“C16 To ensure that any development does not overwhelm the capacity of laneways, specifically with regard for pedestrian and cycling access.”

[Note that this is consistent with Control C2 on p337 of the draft DCP]

Section C2.2.5.4 Iron Cove Distinctive Neighbourhood

Add new Control C12

“C12 To ensure that development provides uninterrupted and connected public foreshore access for pedestrians and cyclists, particularly for development at the northern end of the precinct (presently occupied by Sydney Secondary College).”

Add new Control C13

“C13 To ensure that development provides through-site access for pedestrians and cyclists, including uninterrupted access to the foreshore.”

Section C2.2.5.6 Robert St Industrial Distinctive Neighbourhood

Controls in this section encourage development that will likely crowd out cycling access routes, eg. discouraging residential development and encouraging an increase in building scale and therefore industrial traffic movements. Indeed, the proliferation of on-street parking along Robert St (east of Mullens) has progressively eroded important cycling provision. Counter-measures are required to protect, and in time, enhance the cycling provision in this precinct - and specifically, along Robert St - which serves as the local “funnel” for cycling movements into and out of the region.

Add new Control C25

“C25 Development must not increase the precinct’s traffic or on-street parking burden without explicitly enhancing the associated active transport corridor.”

Add new Control C26

“C26 Development must enhance cycling access to the Anzac Bridge shared path and the Rozelle Marshalling yards corridor.”

Section C4.14 - Medical Centres

Control C3 - Amend to "...and bicycle"

“Adequate car **and bicycle parking** is provided on site in accordance with the provisions of Part C.11 Parking within this Development Control Plan.”

Section C4.15 - Mixed Use

Given the importance of the messaging offered by background notes in the DCP, we recommend that the section “Background” be amended to underline the importance of “localising” life, which would result in a significant reduction in “internal” car trips.

Background - amend text as indicated in bold below

“Mixed use development is an appropriate use within most centres in leichhardt, particularly along Norton Street and darling Street. Mixed use development can have a number of benefits including **localising life, improving safety**, reducing car dependence and improving the vibrancy and viability of centres.”

In light of all the undertakings of Council’s 2025+ Vision, it’s LEP and DCP in relation to reducing personal car usage, it is inconsistent and unsupportable that Council could countenance encouraging a significant increase in personal car use by extending personal car parking capacity.

Control C6 - Delete

~~The use of business car parking for residential uses in the same building after normal business hours is encouraged.~~

Section C4.16 - Recreational Facility

Add new Objective O2

“O2 Encourage use of sustainable transport modes over private car use”

Control C3 - Amend to “...and bicycle”

“Adequate car **and bicycle** parking is provided on site in accordance with the provisions within Part C1.11 - Parking in this Development Control Plan.”

[Note that this amendment will require that Table C7: Bicycle Parking Provision Rates within Section C1.6.3 be updated to include all recreational land use types (indoor, outdoor or major) defined in the *Leichhardt Local Environmental Plan 2013* (as referred to in Section C4.16 - Background of the DCP).]

Section C4.21 - Creative Industries

We note that neither the Objectives nor Controls expressed in this section reflect the stated desire to "...[manage] external impacts such as ...traffic and parking". Accordingly, we propose that a new objective and control be inserted to achieve these aims.

Add new Objective O6

"O6 To favour land use types that encourage the shift to sustainable transport modes"

Add new Control C7

"C7 Development must demonstrate how it favours sustainable transport modes over personal car use."

Please contact us should you wish to discuss these recommendations further.

Could you please email the undersigned with Council's determination of these recommendations?

Yours sincerely

David Borella
BIKESydney
President

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APPENDIX A

BIKESydney's submission to NSW Department of Planning's SEPP65 Review

(February 2012)

Appendix A is not included in the web version of this document.

The entirety of the document may be viewed and downloaded from:

http://bikesydney.org/new10/wp-content/uploads/2012/02/BIKESydney_SEPP65-Submission_web.pdf