



From traffic to transport

Submission to the draft Guide to Transport Impact Assessment

May 2024



Committee
for
Sydney

Acknowledgement of Country

We acknowledge Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of our land – Australia. We pay our respects to their Elders both past and present.

We recognise that sovereignty was never ceded. This was, and always will be, Aboriginal land.

Introduction

The Committee is delighted to see the draft Guide to Transport Impact Assessment – an update of the old Guide to Traffic Generating Development (GTGD).

Firstly, because the GTGD was far too old and unresponsive to the changing nature of a city. Secondly, because the new draft Guide signals a shift away from a focus on car traffic, towards a focus on sustainable modes – including public transport, walking and cycling.

There is much to like about the draft Guide. Many of the recommendations we made in our report [Better for better places 2022](#) have been realised in this draft, including:

- the update to the Guide itself
- the removal of minimum parking rates
- car parking categorisation areas
- the inclusion of details on carshare, unbundled and decoupled parking.

However, we still think the Guide needs improvement to fully realise the goals of the Future Transport Strategy. In this submission we detail the things we'd like to see included that would help create a more sustainable and liveable city.

What we'd like to see included is detailed below, and summarised here:

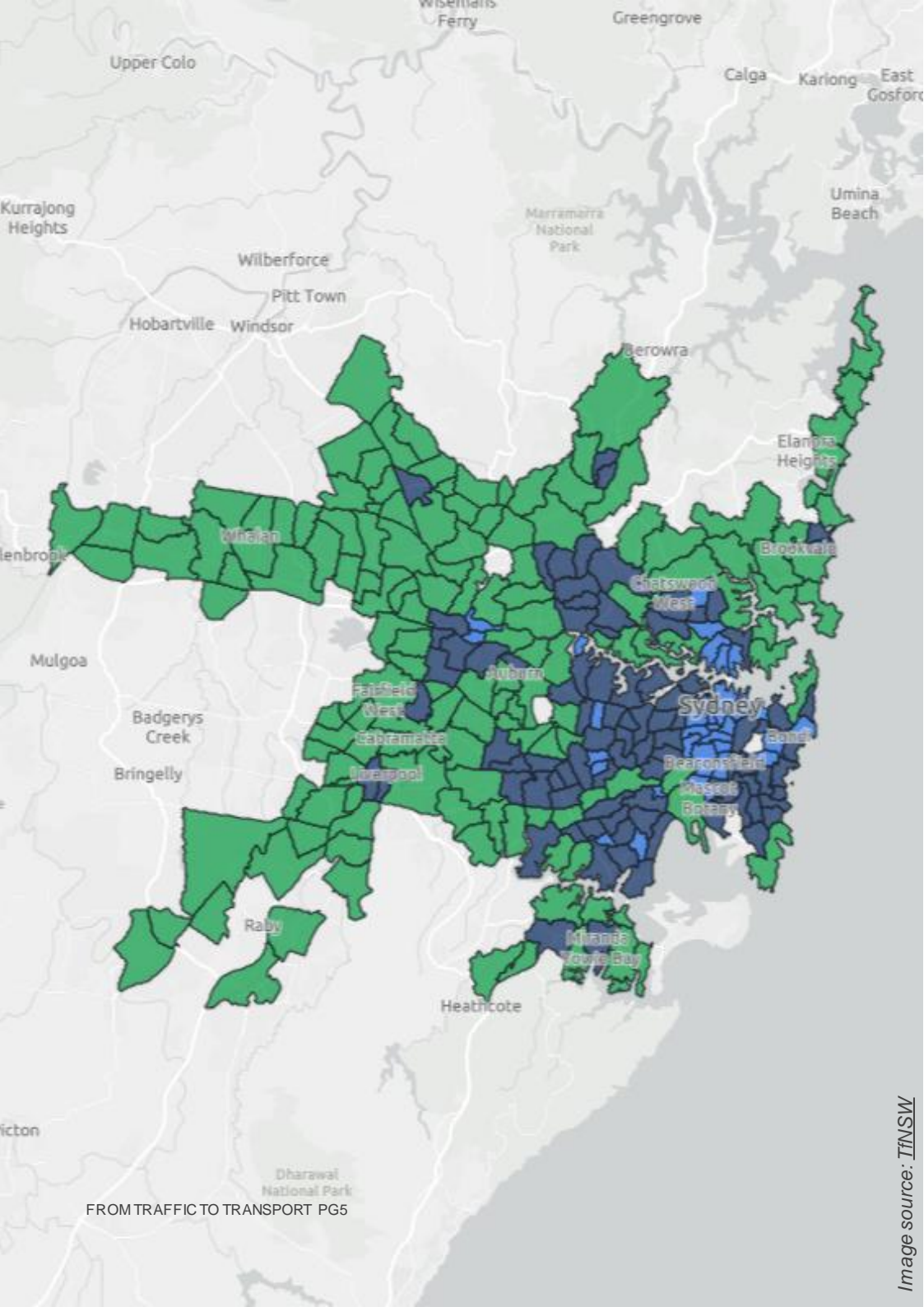
- Switch the approach
- More detail on how developers can mitigate public and active transport
- Updated trip generation survey data
- Design considerations for future convertibility of carparks
- Car parking categorisation by SA1
- Lower parking reference rates
- More details on carshare
- Maximum parking rates for categories 1 and 1A
- A clear and transparent review process

Critically, we want to see a stronger focus on building less parking in transport rich, walkable locations to make development more feasible, and Sydney more liveable.

What we like about the draft Guide

- **The update.** This draft Guide is much needed to align with the goal of more Transport Oriented Development and help address housing affordability. It has been far too long since the last update of the Guide to Traffic Generating Developments in 2002. Since then, Sydney's population has grown by more than 1.4 million people – and about as many cars. For Sydney to grow up instead of out, we need to ensure that, where possible, developments are designed to prioritise public and active transport over private cars.
- **The shift from traffic to transport.** By aligning with the strategic direction of the Future Transport Strategy, this draft Guide makes a crucial shift from focusing on private car trip generation to focusing on trip generation for all modes of transport, including freight.
- **The guidance.** Unlike the Guide to Traffic Generating Developments, this draft Guide to Transport Impact Assessment actually provides clear guidance to practitioners on how to develop a Transport Impact Assessment or Transport Impact Statement for a DA. This is critical to help speed up the design and DA process.
- **The preference for sustainable modes.** If Sydney is to grow sustainably, with vibrant walkable neighbourhoods it is essential that land use planning and transport planning integrate and preference sustainable modes. We are pleased to see this draft Guide clearly preference sustainable modes, as well as offering design considerations or requirements to support their uptake.





- **The detail on travel demand management.** We welcome the chapter on travel demand management that seeks to guide developers and practitioners to better understand how they can influence more sustainable travel behaviour through design, infrastructure, facilities, information, policies and incentives.
- **The car parking categorisation.** Matching the right parking strategies with the right location is essential, requiring sophisticated integration of transport and land use planning. Along with different parking reference rates for different types of development, the car parking categorisation map further ensures the draft Guide is not a blunt tool for parking provision – by suggesting different parking rates based on location, as well as development type.
- **The removal of minimum parking rates.** Minimum parking requirements have led to more parking being built than is needed. This means some people are paying for parking they don't use, which has unintended negative consequences for housing affordability. The removal of minimum parking rates means developers will still build parking where they think it's needed, but if they believe there is a market for car-free housing they will be able to deliver this without government getting in the way.

Image source: TfNSW

What we want to see included

- **Switch the approach.** Currently the draft Guide has a predict and provide approach to parking provision, assuming parking demand is set or predetermined. However, there is an inconsistency in the draft Guide, as it is also recognises that parking demand correlates to, and is largely determined by, parking supply. We suggest resolving this inconsistency by switching to a vision and validate approach to establish a clear place outcome and then determine the amount of parking that aligns with this outcome. Parking references rates should be based on the strategic vision for the location and land use, as well as public and active transport accessibility – which should flow down from the Future Transport Strategy.
- **More detail on how developers can increase public and active transport.** While the draft Guide preferences sustainable travel and offers guidance on how to improve and ensure access to public and active transport options, parking supply remains the only real lever developers can pull to accommodate forecasted trips. We suggest the document should provide guidance on how developers can:
 - engage with Transport for New South Wales to increase local services, or
 - fund service kilometres (such as through mechanisms outlined in section 6.5.1), or
 - fund public and active transport infrastructure (such as through mechanisms outlined in section 6.5.1).

This guidance is necessary for if and when a proposed development cannot sufficiently accommodate forecasted trips generated for public and active transport, but can sufficiently accommodate forecasted trips generated for private vehicles.



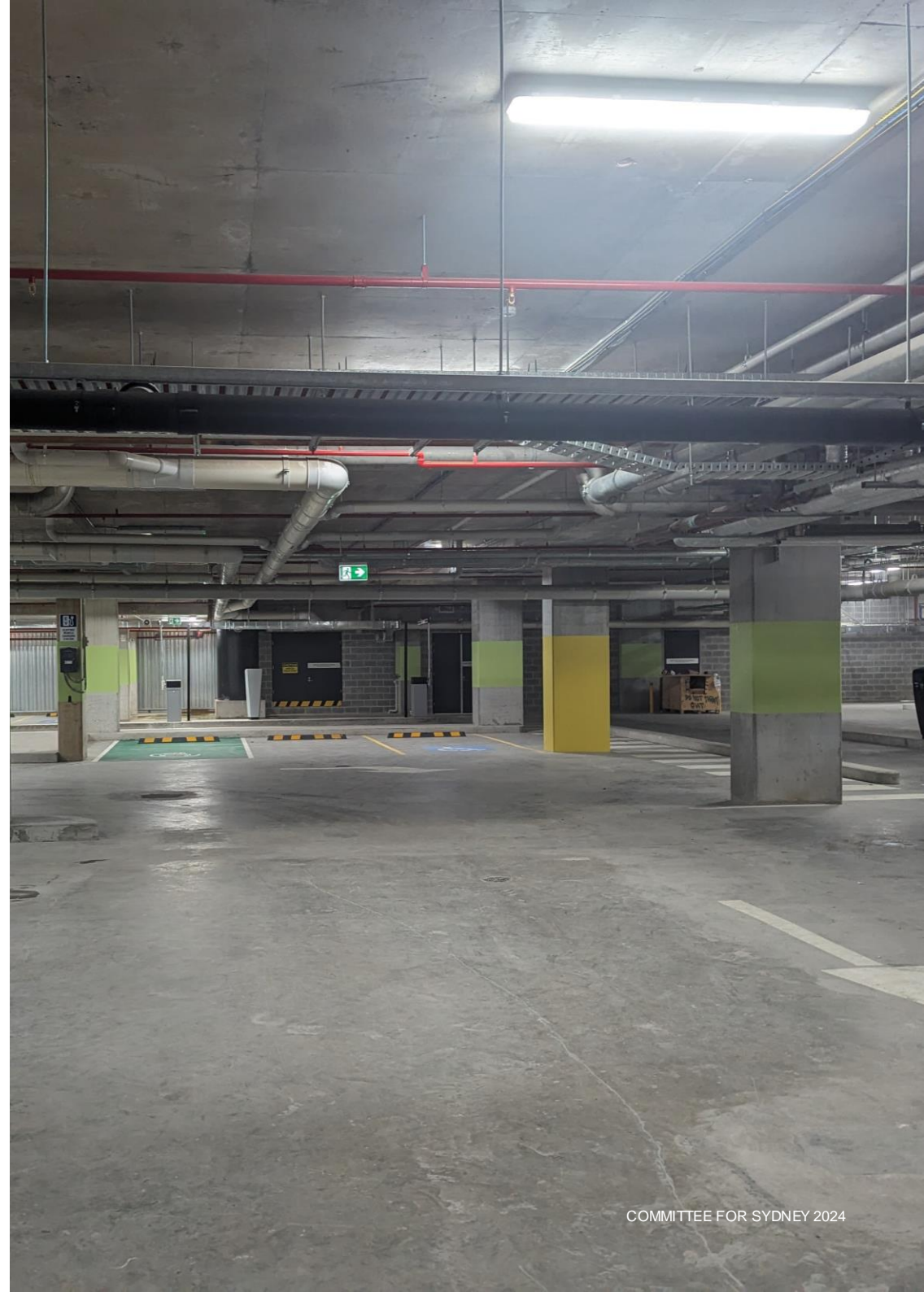


Image source: Unsplash

- **Updated trip generation survey data.** There is relatively limited travel data for Sydney available to practitioners, particularly for linked trips. This is because Census travel data only captures method of travel to work, and the Household Travel Survey is a small sample size so quickly becomes statistically insignificant when cut to analyse specific locations. This means trip generation survey data is a critical input for Transport Impact Assessments and Statements. We suggest that Transport for New South Wales update all their trip generation survey data – some of which is more than 40 years old – when publishing the new Guide. New survey data should include all modes accessible within 1km of the development – including trains and carshare (which are omitted in many of the current datasets).
- **Design considerations for future convertibility of carparks.** As the draft Guide points out, areas that are car dependent now may not be in future. This means that the parking we build today – which has high financial and environmental costs – may not be used in the future. An emerging best practice in the design of carparks is making it possible to convert the space for other uses in the future. While parking certainly isn't the best use of the first few levels of an apartment or commercial building, keeping parking above ground will make buildings more sustainable with space that can be converted for higher uses in the future. Underground parking is energy intensive, requiring constant ventilation and lighting – an estimated 60% of an apartment building's total energy consumption is from common property, such as carparks. Examples of developments with carparks designed with future conversion capability include:
 - 32 Smith Street, Parramatta
 - Commuter carpark, Campbelltown

EXO Victoria Harbour, Melbourne National Australian Built Environment Rating System, NABERS Energy, accessed via <https://www.nabers.gov.au/ratings/our-ratings/nabers-energy>

- **Car parking categorisation by SA1.** While we commend Transport for New South Wales for their development of the car parking categorisation map, we suggest the map should be updated to an SA1 level of analysis, instead of SA2. This would ensure parking reference rates are more targeted, depending on a location's walkability, public transport accessibility, mode split and density. SA2 is too large an area to capture these differences across Sydney – for example, parts of Campbelltown captured by an SA2 level analysis are highly walkable with good public transport access, but other parts are less walkable and more car dependent. SA1s with similar attributes will likely cluster, which could help local councils develop DCP conditions for different areas.
- **Lower parking reference rates.** While we are thrilled to see the removal of minimum parking rates, we suggest Transport for New South Wales consider reducing the reference rates, particularly for high density residential in categories 1, 1A and 2. We note the draft Guide's reference rates for high density residential match the old Guide's minimum rates, but the draft Guide has lower reference rates for medium density residential. With more public transport capacity about to come online, with the opening of new Metro lines, Light Rail, and potential improvement in bus services, there is less "need" to provide as much parking, especially in transport rich locations. As these are reference rates only, councils or developers may still provide more parking if they would like.





- **More details on carshare.** The draft Guide references and explains carshare well in section 8.4.7. However, in our view carshare should be integrated more fully into the Guide, with more details on:
 - design considerations, so that carshare spaces are located before a security/roller door so they are easily accessed by members, cleaners, and maintenance teams
 - how carshare would reduce the reference parking rate, with simple calculations for developers and practitioners
 - how carshare impacts trip generation mode share – as carshare members typically reduce their annual vehicle kilometres travelled by 50%, shifting more trips to public and active transport.
- **Maximum parking rates for categories 1 and 1A.** Maximum parking rates are already in place under the [State Environmental Planning Policy \(Precincts—Eastern Harbour City\)](#), and were proposed as part of the TOD SEPP – but do not seem to have been published in the [State Environmental Planning Policy \(Housing\) Amendment \(Transport Oriented Development\) 2024 \(2024-135\)](#). The City of Sydney, North Sydney and Waverley councils have also all implemented maximum parking rates for all types of new development within their areas. Several other councils have implemented maximum parking rates for certain types of development, or development in particular locations. Transport for New South Wales should provide guidance for maximum parking rates in categories 1 and 1A (at the SA1 level) to help the NSW Government, and local councils achieve their transport sustainability goals.
- **A clear and transparent review process.** This suggestion relates to the process of updating the Guide, rather than the Guide itself. We recommend Transport for New South Wales set transparent review cycles. It is critical that the trip generation survey data, car parking categorisation map and associated parking reference rates remain relevant as Sydney changes over time – and aren't static for another 22 years.



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