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To whom it may concern

The Draft Transport Management and Accessibility Plan (TMAP) Guidelines

Urban Taskforce Australia welcomes the long-overdue update to the 2002 *Draft Interim Guidelines on Transport Management and Accessibility Plans*.

In general, the proposed TMAP Guidelines are a positive step forward for modernised transport assessment in NSW. Urban Taskforce supports the additional clarity and context provided by The Guide and the focus on broader outcomes of a precinct, balancing Transport and Place Making.

The following outlines Urban Taskforces recommendation on The Guidelines.

Accountability for Unresponsive Agencies

The Development Industry is rife with stories of delays to Planning proposals for myriad reasons, taking months and years, slowing delivery, destroying feasibility and reducing supply, all without an obvious increase of quality or amenity to the consumer.

With the proposal of additional Government Departments and Agencies being involved in the TMAP Process, as well as the Project Control Group, there are more stakeholders, and ostensibly more complexity, involved in the TMAP stages.

However, the TMAP is written as though these agencies are always available, responsive and eager. Of course, this is not the case. The details of the many agencies that will now be involved in the TMAP process are outlined on page 28 of the Draft Guidelines.

With no appeals pathway or other recourse to contain runaway assessments, it is unclear who will have the ultimate authority and decisions-making powers if an Agency is unresponsive.

Likewise, there is nowhere for a development proponent to go when a Government Agency is uncooperative, and consensus cannot be reached on aspects of the plan.

To build confidence in the TMAP process, there needs to be the expectation of a timeframe for assessments with transparency and accountability.

These timeframes would be a point of coordination for development proponents and Agencies to plan the rollout of the assessment and coordinate follow up meetings.

Metrics can be captured for Agencies to enable bilateral monitoring and improvements. These timeframes will need to be based on project scale: i.e. '6 weeks for mezzo-scale projects; 12 weeks for precinct-scale projects. Service level agreements (SLA) should be signed off by relevant agencies.

Further to this, the commercial interests of the developer including delivery costs and feasibility, as well as the urgent need for housing supply, should be taking into consideration when deciding the scope required for each assessment.

Recommendation 1: that provision is made for an appeal pathway to be available to development proponents when a review of the TMAP Process and Agency actions or decision making is required.

Recommendation 2: that provision is made in the TMAP Guidelines for time parameters for each step of the TMAP process, as well as expectations of deadlines for Agency reactions and returns, with appropriate metrics and expectation that timeframes will be adhered to. These metrics should be embedded in Service Level Agreements to enable easily referenced escalation or appeal.

Recommendation 3: that primacy be placed on housing delivery and this primacy be folded into the TMAP Guidelines. This should reflect the cost of delay, unnecessary re-work and scope of work required.

Responsibilities and Funding Arrangements

This section (page 45) details the reaching of agreement on the allocation of funding responsibilities between the parties. In some cases, Government itself will be a part funder of works to be delivered as a result of the development proposed in a TMAP. This occurs where a proposal is generating additional travel demand in the context of underlying growth in background demand from the wider area, but which traverses the area of the subject of the planning proposal.

The link between the TMAP process's outcome and the annual budgetary process of the Transport for NSW is not sufficiently strong, nor clear.

If a rezoning requires government funding to complement developer funding, there is risk that the NSW Budget allocations process may be years behind or not eventuate. Formalising a relationship between the agreed TMAP outcome and the formal NSW Budget processes would be a logical next step, but something Government has historically been reluctant to do.

To mitigate costly inefficiencies, there should be a stronger link between the TMAP Guidelines and Infrastructure Opportunities Plans being prepared as part of the implementation framework of the Housing and Productivity Contribution levy.

Recommendation 4: that TfNSW inscribes a direct link into the TMAP Guidelines to connects work obligations coming as a result of the TMAP process to TfNSW's budget allocation for TMAP work.

A Common Assumptions Framework

With the substantial time and cost resources involved in the TMAP process, it is important to streamline proceedings in any way practical.

While assumptions are forged a new with a diverse set of stakeholders for each project, there is an opportunity for a common set of assumptions, that are unchanging between projects, to be nominated in the TMAP Guidelines.

This common assumptions framework, would function well with planning assumptions and other areas where absolutes are found. It would provide a starting point, from which the development case can build further, agreed-upon assumptions with all stakeholders.

Recommendation 5: that TfNSW make provision for a framework of common assumptions that forms the launch pad for further assumptions with a lens to streamline the TMAP process.

Model Reuse

Time equates to costs, and at the scale of the projects proposed under TMAP scope, it is important to find efficiencies in the process.

Completed TMAP Process documentation becomes the framework for future assessments.

Likewise, the documentation of TMAP assessments of one precinct's project can be highly relevant for another project in the same precinct or other projects will similar aspects.

The modelling and technical studies generated for past TMAP assessments should be considered for reuse in the new TMAP process to the extent that they reflect **functionally similar** circumstances. Not only would this save time and cost to developers, but it would allow scarce resources to be focused on new data and knowledge pertinent to the current project.

This is a simple proposal which could substantially reduce the time, cost and effort created by the need for the reproduction of data and modelling from scratch.

Recommendation 5: that TfNSW allow for modelling and studies of past TMAP processes to be available for reuse for new TMAP processes where functionally similar.

TMAP Teams

Urban Taskforce is advised that, dependant on the project team assessing the TMAP process, the speed, cost and results can be widely divergent. We are of the understanding that TMAP teams require a diverse set of disciplines with a depth of experience in precinct-scale, multimodal projects.

These resources are not always easily available.

With the stated robust governance goals: “fostering accountability, transparency, efficiency, and ethical behaviour” (p.15) and the amount of resources involved, having the breadth and depth of experience readily available is worth the extra cost.

In addition, closer ties between Project Control Group and the other governance entities may also expedite proceedings.

Recommendation 6: that TfNSW make provision in the TMAP documentation for resources to be allocated, and a coordination framework be created that allows a stronger interface between TMAP stakeholders, that will allow the required experience and decision makers to be available.

Broader Precinct Outcomes

The new provision to develop a shared vision through a balance of Transport and Place Making is welcome. Corridor protectionism and a singularity of transport focus can produce less-than-optimal outcomes for communities and development proponents.

The Movement and Place Built Environment indicators look to support intention and outcome, however this interface also expands Transport Planning to include other areas of not previously under the scope of Transport like Urban Design.

In meeting community visions, there is a risk that this framework will capture the TMAP process, spreading assessment resources thin and having transport planners assess elements in the remit of urban designers.

These provisions need to align to community and developer requirements and housing delivery outcomes.

The role of place making should be limited and focus on opportunities for increased housing supply so as not to interrupt or burden the main purpose of the TMAP issue, transport network provision.

Recommendation 7: that the development of a shared vision using the Movement and Place Built Environment indicators, align with community and developer requirements, and focus on the benefits of housing delivery to region.

Formalise a Full and Lite TMAP Versions

The framework given is appropriate for massive master-planned precincts, however does not scale down practically. Urban Taskforce is advised that medium to small planning proposals won't survive the process described in the framework.

It is also unclear what elements are to be used at what project scale.

There is reference to a TMAP being "a consultative process between stakeholders" (p.10), however the provision is nebulous, with the notion that developers, local council and state agencies will just "hash out" what needs to be done and what doesn't.

The 'shortened transport study or statement' level is completely at the discretion of the state and local Governments, who are notorious for maximising requirements and requiring minute levels of detail causing delay and wasting money.

Allowing the Guidelines to be this broad retains all of the power with Government and provides no structure for development proponents to start from or stabilise with, during the process.

As the difference between a full TMAP process and a 'shortened transport statement' involves highly varying time and resource allocation, the industry needs clarity on what category they will fall into from the conception stages without it being left up to an approval authority's discretion.

It's not adequate to say a TMAP applies to medium to large scale developments with significant trip generation impacts.

A better solution would be to prescribe at what extent an aspect of a project triggers a particular process.

As was exhibited in the Transport Impact Assessment Guidelines, with the 'Transport Impact Assessment' and the 'Transport Impact Statement', a **full** and **lite** version of the TMAP processes should be forged.

These Traffic Impact Assessment versions are crystal clear in their extent, providing purpose metrics (see Appendix) that sets out the parameters and thresholds that dictate when a TIS or TIS is required. The level of assessment is based on the level of impact (see below).

3.2.5 Level of detail

Developments may vary from small establishments that generate relatively low numbers of trips generated to large mixed use, retail, commercial, industrial, or residential developments that generate high volumes of trips. The extent of assessment for a smaller development will be less detailed than for a major development. The level of assessment is proportional to the level of impact expected by the proposed development based on the site location and context.

Table 3.2. TIA level

Type of report	Description
Transport Impact Statement (TIS)	The TIS is to be used for developments which size or capacity and their site access(es) to adjoining road do not exceed the thresholds as defined in Columns 2 and 3 of Schedule 3 in the State Environmental Planning Policy (Transport and Infrastructure) 2021 . The statement is intended to collect factual information about the proposed development such as site location and context, development scale, access arrangements, trip generation and distribution.
Transport Impact Assessment (TIA)	The TIA is to be used for developments which size or capacity and their site access(es) to adjoining road meet or exceed the thresholds as defined in Columns 2 and 3 of Schedule 3 in the State Environmental Planning Policy (Transport and Infrastructure) 2021 , or as a requirement of another EPI.

Recommendation 2: that a FULL and LITE version of TMAP processes is formalised in the guidelines and legislation and that a metric-based framework is provided that dictates what process a project will fall under.

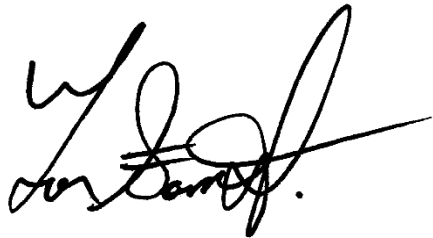
Conclusion

With the context of the current housing crisis, Urban Taskforce believes these updated TMAP provisions can help speed the delivery of quality precincts and well-located housing.

However the balance of assessment burden must be balanced against the urgency of the housing crisis.

Should you wish to discuss this matter further, please call our Head of Policy,
Planning and Research, Benjamin Gellie on 0461566807 or via email
benjamin@urbantaskforce.com.au

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tom Forrest', with a stylized flourish extending to the right.

Tom Forrest
Chief Executive Officer

Appendix

State Environmental Planning Policy (Transport and Infrastructure) 2021 [NSW] Schedule 3 Traffic-generating development to be referred to TfNSW Chapter 2

Column 1	Column 2	Column 3
Purpose of development	Size or capacity—site with access to a road (generally)	Size or capacity—site with access to classified road or to road that connects to classified road (if access within 90m of connection, measured along alignment of connecting road)
Airports or heliports	Any size or capacity	Any size or capacity
Car parks (whether or not ancillary to other development)	200 or more car parking spaces	50 or more car parking spaces
Commercial premises (other than premises specified elsewhere in this table)	10,000m ² in gross floor area	2,500m ² in gross floor area
Food and drink premises (other than take away food and drink premises with drive-through facilities)	Car parking for 200 or more motor vehicles	300m ² in gross floor area
Freight transport facilities	Any size or capacity	Any size or capacity
Hospitals	200 or more beds	100 or more beds
Industry	20,000m ² in site area or (if the site area is less than the gross floor area) gross floor area	5,000m ² in site area or (if the site area is less than the gross floor area) gross floor area
Liquid fuel depots	8,000m ² in site area or (if the site area is less than the gross floor area) gross floor area	8,000m ² in site area or (if the site area is less than the gross floor area) gross floor area
Residential accommodation	300 or more dwellings	75 or more dwellings
Service stations without heavy vehicle refuelling or maintenance services		Any size or capacity
Shops	2,000m ² in gross floor area	500m ² in gross floor area
Subdivision of land	200 or more allotments where the subdivision includes the opening of a public road	50 or more allotments
Take away food and drink premises with drive-through facilities	200 or more motor vehicles per hour	Any size or capacity
Transport depots	8,000m ² in site area or (if the site area is less than the gross floor area) gross floor area	8,000m ² in site area or (if the site area is less than the gross floor area) gross floor area
Shops	2,000m ² in gross floor area	500m ² in gross floor area
Subdivision of land	200 or more allotments where the subdivision includes the opening of a public road	50 or more allotments
Take away food and drink premises with drive-through facilities	200 or more motor vehicles per hour	Any size or capacity
Transport depots	8,000m ² in site area or (if the site area is less than the gross floor area) gross floor area	8,000m ² in site area or (if the site area is less than the gross floor area) gross floor area
Warehouse or distribution centres	8,000m ² in site area or (if the site area is less than the gross floor area) gross floor area	8,000m ² in site area or (if the site area is less than the gross floor area) gross floor area
Waste or resource management facilities	Any size or capacity	Any size or capacity
Any other purpose	200 or more motor vehicles per hour	50 or more motor vehicles per hour