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31 May 2024

Strategic Transport Planning Team

Transport for NSW

Email: gtia@transport.nsw.gov.au

Re: Have your say – Guide to Transport Impact Assessment (GTIA)

Local Government NSW (LGNSW) welcomes the opportunity to comment on the draft Guide to Transport Impact Assessment (GTIA – ‘the Guide’) as an update to the existing Guide to Traffic Generating Developments.

As the peak body for local government in NSW, representing NSW general purpose councils and related entities, LGNSW supports improvement to planning assessment that facilitates more transparent project determinations that the Guide can support. LGNSW also seeks to ensure that councils and communities alike are consulted and appropriately considered as part of the environmental assessment and approval process.

The GTIA is a helpful tool for use by determining authorities such as councils. Councils and communities are typically familiar with Development Applications (DAs) as the approval pathway for developments requiring consideration of transport and traffic impacts. This submission therefore focuses on the proposed update to the existing Guide to Traffic Generating Developments as it affects development applications, but also its application to Environmental Impact Assessment (EIA) activities by public authorities.

This submission to Transport for NSW (TfNSW) is informed by the policy positions of LGNSW and consultation with councils. Please note this submission is provided as a draft, pending endorsement by the LGNSW Board at its next meeting. We will advise of any amendments to the submission in due course.

General comments

LGNSW wishes to convey our general support for the anticipated update of a universally and consistently used tool in local government planning assessment. The inclusion of new and emerging trends in micro-mobility, electric vehicle use and application of software tools to analyse travel demand reflect changing technology. The reset of approach from vehicle trips to person trips also reflects a change in approach to transport modes and infrastructure.

LGNSW wishes to make the following recommendations to further enhance the applicability and usability of such a comprehensive guide.

GTIA application to Division 5.1 assessments

The Guide has historically been applied to DAs as they are assessed under Part 4 of the *Environmental Planning & Assessment Act 1979* (the Act). The Guide has not historically been applied to Division 5.1 assessment under the Act which involves the assessment of certain activities carried out by public authorities.

Chapter 2 of the GTIA references the legislation, strategic direction and standards that are relevant to transport matters. However, the application of the guide is not specific about inclusion of Division 5.1 assessments under the Act. There is reference to State Significant Development (SSD) and also preparation of Environmental Impact Statements (EIS), but only as development assessments.

LGNSW would like to see clarification in the GTIA such that it is also clearly applied to EIA under Division 5.1 of the Act. This would mean application to State Significant Infrastructure (SSI) applications and environmental assessments such as a Reviews of Environmental Factors (REF) by public authorities.

The reason for this is firstly because the new draft GTIA will be a comprehensive and 'best practice' leading document that would assist in the assessment of traffic and transport related matters for all significant developments.

Secondly, by way of example, there are new and emerging uses and developments that are having a significant impact on local communities that may not be contemplating the transport related externalities and unintended consequences of their construction and operation.

For example, renewable energy developments, particularly the large-scale ones located in the NSW Renewable Energy Zones, can create major change to traffic patterns in operation and road damage and access issues during construction. The haulage of wind turbine blades, for instance, requires special haulage routes that restrict public access and may damage local roads due to repeated and cumulative use with no consequence or consideration to the impact to local communities.

Many of these projects are SSD, SSI and assessed by REF – they are not usually development assessments. At present, the GTIA is silent on the application to Division 5.1 assessment, yet this type of emerging and significant use and development would benefit from the considerations that the GTIA can offer. The impact of this type of development is highlighted in LGNSW's recent submission on the Energy Policy Framework, currently under consideration by the NSW Government.¹

The NSW Government's own guidelines² in this regard do not specify traffic and transport considerations apart from more general considerations for the immediate localised impact of the proposed activity within the affected local government area. It would be beneficial for TfNSW to collaborate with the NSW Department of Planning, Housing and Infrastructure (DPHI)

¹ [LGNSW_Submission_Energy_Policy_Framework.pdf](#)

² *Guidelines for Division 5.1 assessments*, Department of Planning and Environment, June 2022

on this matter. There are also other relevant infrastructure examples that apply under the Transport and Infrastructure State Environment Planning Policy (T&I SEPP) (such as hospitals and education facilities) that would utilise Division 5.1 of the Act for assessment and determination. Requiring consideration of the GTIA would be particularly beneficial for infrastructure assessment in these cases.

LGNSW recently made a submission with regards to the T&I SEPP that would be beneficial for TfNSW in understanding a wider context of assessment impacts on local communities across the whole of NSW government agencies.³

Recommendation 1: The proposed draft GTIA needs to clarify its applicability to all environmental assessment, which includes both Development Application (DA) and State Significant Development (SSD) assessments under Part 4 of the Environmental Planning and Assessment Act and State Significant Infrastructure (SSI) and Reviews of Environmental Factors (REF) and Environmental Impact Statements (EIS) under Division 5.1 assessments of the Act. An update of the Department of Planning and Environment (now Department of Planning Housing and Infrastructure) *Guidelines for Division 5.1 assessments, June 2022* would also clarify the application of GTIA.

GTIA Land Use Trip Generation tables and periodic review

The inclusion of the classic land use trip generation tables in Chapter 5 of the GTIA are considered to be more an historic reference than contemporary benefit.

Some of the reference origins date back to 1979 (motels), 1980 (hotels and restaurants) and are no longer relevant to modern usage. For example, a restaurant of yesteryear would operate in a completely different manner to contemporary practices of customers using take-away and personal food delivery services and never entering the premises. Much of the traffic generation may be e-bikes and scooters from workers, not customers.

There are also some outdated data or less relevant uses that rarely appear as development nowadays – for example the restaurant data is based on 1981 surveys, squash courts (1980) are a little-seen use these days and fast food drive-through restaurants may have replaced drive-through coffee outlets (2015).

For the GTIA to be a more concise document offering contemporary guidance, LGNSW suggests these land use trip generation tables could be either removed or relegated to the appendices. If the GTIA is updated every 5 years, this would also assist in keeping a leading edge of relevance to the developments and activities it covers.

Recommendation 2: To make the GTIA a more concise and contemporary guidance tool, the land use trip generation tables should be removed from the document. If they are required as a reference, those that remain contemporary in their assumptions could be included in the

³ [LGNSW_Submission_Transport_and_Infrastructure_SEPP_EIE.pdf \(lgnsw.org.au\)](#)

appendices. A commitment to review the GTIA every 5 years would also assist in providing relevant, up-to-date and beneficial guidance.

Consideration of other new and emerging uses

The GTIA succeeds in giving a good overview evaluation of many new and emerging trends, land-uses and transport modes. With the pace of change, not all trends or disruptors in the market will be contemplated. However, LGNSW would appreciate inclusion of more considerations that tie in with other broader NSW government policy. These are outlined below.

Micro-mobility as a service and Night-time economy

The GTIA contemplates micro-mobility and the emergence of trials if not adoption of e-bikes and e-scooters as a mode. It could go further to discuss the implications as an outreach of businesses in a new model connected to retail and restaurant uses and the encouragement of the night-time economy in the recent NSW Government vibrancy reforms.⁴

E-bikes, e-scooters and motorcycle parking

LGNSW advocates for more guidance in the GTIA around community awareness and safety campaigns for the growing use of e-bikes and e-scooters, particularly as they frequently occupy footpaths and are often used by students and youth who may be less familiar with traffic and road rules. The safe and designated occupation of footpaths for motorbikes, scooters, e-bikes and e-scooters warrants discussion in the GTIA as this has been adopted in other States as an effective space saver alternative to occupying road space.

Electric vehicle charging and encouragement of take-up

The NSW Government's Net Zero Plan supports a range of initiatives targeting cuts in emissions, including advocating for electric vehicles.⁵ The GTIA could go further in encouraging convenient charging for vehicles and consideration of location and use of different Electric Vehicle Charging (EVC) units.

Proposed changes to planning approval pathways for the installation of EVCs, including installation of EVC units on telecommunications housing as exempt development and electric vehicle unit installation on substations, power/lighting poles and street furniture as development without consent are all currently being contemplated by DPHI.⁶

Councils are liable for incidents occurring on their roads and footpaths and therefore have legitimate concerns about potential trip hazards, obscuring sight lines for traffic safety and fire sources.

LGNSW would also welcome the NSW Government considering whether environmental assessment requirements under the *Environmental Planning and Assessment Act 1979*

⁴ [Vibrancy Reforms | NSW Government](#)

⁵ [Net Zero Plan | NSW Climate and Energy Action](#)

⁶ [Explanation of intended effect – improving planning processes to deliver infrastructure faster | Planning Portal - Department of Planning and Environment \(nsw.gov.au\)](#)



duplicate requirements under the *Roads Act 1993*. Councils support the transition to a low carbon transport system and where processes can be streamlined while maintaining the important role of local government in considering impacts of the activity, these are supported, as expressed in our recent submission to DPHI.⁷

Recommendation 3: The GTIA should expand consideration and discussion in more detail of more new and emerging uses and trends as they apply to and support recent NSW Government policy.

Thank you for the opportunity to comment on the draft GTIA. LGNSW appreciates the opportunity to help refine NSW Government policy guidance that supports advocacy of our current policy platform. For any further information on LGNSW's position, please contact Jane Partridge (T: 9242 4093 E: jane.partridge@lgnsw.org.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'D Thomas', with a stylized flourish at the end.

Damian Thomas
Director Advocacy

⁷ [LGNSW_Submission_Transport_and_Infrastructure_SEPP_EIE.pdf\(lgnsw.org.au\)](#)