

Our ref: R24/0026#02

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TMAP Project Team

Transport for NSW

Email: TMAP@transport.nsw.gov.au

Re: Have your say – Transport Management and Accessibility Plan Guidelines

Local Government NSW (LGNSW) welcomes the opportunity to comment on the draft Transport Management and Accessibility Plan (TMAP) Guidelines as an update to the existing TMAP Guidelines, 2002.

As the peak body for local government in NSW, representing NSW general purpose councils and related entities, LGNSW supports the development of strategic planning tools such as TMAPs, which are required as a result of proposed major land use changes resulting from precinct plans, masterplans and planning proposals. LGNSW also seeks to ensure that councils and communities alike are supported by state agencies in the preparation of TMAPs, as part of the environmental assessment and planning approval processes.

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

A TMAP 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. However, the TMAP is a pre-requisite to understanding the transport network and service requirements of an area when significant capacity changes are enabled under changes to land-use zoning.

This submission focuses on the proposed requirements for preparing a TMAP. The purpose of a TMAP is to support planning proposals that would result in the need for major enhancement to transport-related infrastructure and services. Usually, these significant uplifts to development or housing capacity have a long gestation of consultation and staged gateway processes to the pathway of approval. This gives councils the time to prepare and budget for the significant work required for input to supporting documents such as TMAPs.

Transport Oriented Development

Unexpectedly, councils have recently been informed of eight (8) accelerated Transport Oriented Development (TOD) Precincts which propose to enable significant uplift in eight metropolitan town centres, without the usual district and regional planning processes that would normally precede such a city-shaping change to these town centres. The Department of Planning, Housing and Infrastructure (DPHI) is currently exhibiting seven of the accelerated TOD precincts but these are not accompanied by pre-prepared TMAPs. The eight precincts were selected using public transit capacity of train lines, whereas TMAPs state the need to assess multi-modal transport options in their preparation¹. There are also thirty-seven (37) additional TOD locations nominated across the Greater Sydney, Hunter and Illawarra areas being rolled out progressively until June 2025.²

TMAP preparation

In order to satisfy the requirements of the updated TMAP Guidelines, TMAPs for each of the 8 accelerated TOD precincts and the additional 37 TOD precincts, will need to be prepared in a timely manner to accommodate the TOD rollout by DPHI.

TfNSW states the need for a robust governance structure when preparing a TMAP: *TMAPs can be produced or sponsored by a variety of NSW Government agencies, local government or developers.*³ As the responsible authority for the majority of development applications, councils are the logical owner and instigator to preparing these TMAPs.

LGNSW wishes to convey our general support for the 2024 update of the TMAP Guidelines as a universally and consistently applied tool for local government's preparation in their council areas. The inclusion of relevant state agencies in their preparation is also welcome. However, the cost and time implications for local councils warrants financial grant support from the state agencies imposing these new requirements in TOD locations.

LGNSW makes the following recommendation for consideration in the preparation of TMAPs.

Recommendation: Councils in the announced TOD locations should be financially assisted with a grant program for the preparation of TMAPs at each of the 37 stations and 8 precincts.

Thank you for the opportunity to comment on the draft TMAP Guidelines. For any further information on LGNSW's position, please contact Jane Partridge (T: 9242 4093 E: jane.partridge@lgnsw.org.au).

Yours sincerely



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¹ [TMAP 2024 Guidelines - What is a TMAP? p9](#)

² [TOD Program, DPHI](#)

³ [TMAP 2024 Guidelines - A robust governance structure, p15](#)