<table>
<thead>
<tr>
<th>DATE</th>
<th>APRIL 2010</th>
</tr>
</thead>
</table>

SUBMISSION TO METROPOLITAN TRANSPORT PLAN – CONNECTING THE CITY OF CITIES
INDEX

Executive Summary .................................................................................................................. 3
Introduction .............................................................................................................................. 4
Specific Comments on the Metropolitan Transport Plan ......................................................... 5
Transport and Land-use Planning ............................................................................................ 5
Transport Objectives, Modal Choice & Infrastructure Requirements ....................................... 6
Freight Transport .................................................................................................................... 7
Finance/Pricing ........................................................................................................................ 8
Conclusion .................................................................................................................................. 9

Annexure: Submission on the Sydney Metropolitan Strategy Review
Executive Summary

Local Government recognises the importance of public transport as a vital component of the overall transport task in all areas of the state, but especially in the greater Sydney area. The provision of public transport contributes not only to the long-term sustainability of our communities, but also provides vital access to those people in remote locations or in disadvantaged groups.

While various transport and planning ministers have been involved in the development of a range of detailed strategic planning documents for addressing Sydney’s transport needs, what has been absent is a subsequent committed and funded implementation plan to deliver these overarching strategies in a timely, consistent and financially sound manner.

This must include a commitment to key transport infrastructure investments that underpin and support those planning strategies. These vital investments must be developed and staged as essential components of the broader Metropolitan Strategy, not as one-off projects built years after they are required.

More specifically, the Associations support the extension of existing CityRail heavy rail lines to North West Sydney, within the CBD and as already announced, to South West of Sydney, rather than the short-sighted metro plans previously being advanced by the government. This builds on and enhances the existing established rail network rather than creating a whole new technology with questionable connectivity to existing services, and it will serve a larger proportion of the greater Sydney population than would be possible under the shorter metro line proposals.

With the CBD metro project now shelved, construction could and should immediately be shifted to these new heavy rail extensions, rather than forcing the people of Western Sydney to wait another 5-7 years for any sign of new construction, let alone the much longer wait for these projects to be completed.

The creation of a new Sydney Metropolitan Development Authority (MDA) to drive future transit-oriented development and urban renewal may go some way to address broader issues of strategic transport and land use planning in greater Sydney. However, there is a risk this may be restricted to key nodes of interest to developers while ignoring the larger transport and land use issues across the growth areas of Sydney.

The Associations membership has raised numerous issues with the expanding freight transport task and the impact this is having on transport and planning aspects within Sydney and across the state as a whole. These include local road pavement, bridge, and road design impacts, road safety concerns (real and perceived), noise & amenity issues and congestion, parking and the need for rest areas. Given these impacts, in many cases councils need financial incentives and/or compensation to open up local road networks to heavy vehicles, either through increased direct grants from governments, access to road user charges (mass/tonne/km etc), or some mechanism to share in productivity improvements that the freight industry receive from higher productivity vehicles and pass on to their customers.

New funding models are required that allow for the long term funding of infrastructure and ongoing services required to meet Sydney’s increasing population. There are serious flaws and contradictions in the current State Government approach, with recent limits and thresholds on infrastructure contributions at both State and Local level, no long term commitment to infrastructure priorities, and rate pegging of local councils. Providing councils with alternative funding mechanisms would assist them to address specific local transport infrastructure pressures presented by the growing population needs of Sydney. In addition, we have concerns that the Transport Plan has ‘quarantined’ road funding at existing levels, rather than using some of this existing non-local road funding to increase or expedite public transport investment.
Introduction

The Local Government Association of NSW and Shires Association of NSW (the Associations) are the peak bodies for NSW Local Government.

Together, the Associations represent all the 152 NSW general-purpose councils, the special-purpose county councils and the regions of the NSW Aboriginal Land Council. The mission of the Associations is to be credible, professional organisations representing Local Government and facilitating the development of an effective community-based system of Local Government in NSW. In pursuit of this mission, the Associations represent the views of councils to NSW and Australian Governments; provide industrial relations and specialist services to councils and promote Local Government to the community.

Local Government recognises the importance of public transport as a vital component of the overall transport task in all areas of the state, but especially in the greater Sydney area. The provision of public transport contributes not only to the long-term sustainability of our communities, but also provides vital access to those people in remote locations or in disadvantaged groups. We acknowledge the urgent need for discussions on the issue of public transport and welcome the opportunity to contribute our views to the Government’s Metropolitan Transport Plan considerations.

While various transport and planning ministers have been involved in the development of a range of detailed strategic planning documents for addressing Sydney’s transport needs, what has been absent is a subsequent committed and funded implementation plan to deliver these overarching strategies in a timely, consistent and financially sound manner.

Planning for a sustainable Sydney 2036 will require more than the rewriting of targets for housing and jobs, the creation of new bureaucracies or the merging of existing plans, as part of a renewed Metropolitan Strategy for Sydney. It must include a commitment to key transport infrastructure investments that underpin and support those planning strategies. These vital investments must be developed and staged as essential components of the broader Metropolitan Strategy, not as one-off projects built years after they are required.

The Associations’ submission covers key aspects of the public transport debate from a Local Government perspective. These include the abovementioned need for an implementation plan, but also detailing other important issues i.e.:

- Specific comments on aspects of the Metropolitan Transport Plan – Connecting the City of Cities document released in February this year;
- The inclusion of committed transport planning as an integral component of strategic land-use planning processes, including regional and sub-regional planning mechanisms;
- The need for transport planning processes to include objectives aimed at reducing car dependence and promoting sustainable, affordable, efficient and equitable transport across all geographical, employment and residential areas of Sydney;
- A program of Public Transport priorities that should include consideration of specific transport projects including new heavy and light rail routes, bus priority routes and treatments; commuter car parking at key transport interchanges, and positive taxation treatments for public transport users;
- Transport infrastructure provision that is consistent with State Infrastructure Strategy and other strategic planning instruments;
- Integration of transport modes and factors affecting transport modal choice;
- Streamlining transport administration in NSW; and
- Some thoughts about transport pricing and financing.
Specific Comments on the Metropolitan Transport Plan

• Local Government welcomes the release of the Metropolitan Transport Plan – Connecting the City of Cities, but urges he Government to take immediate action to ensure that there is a financial commitment to the key components of the plan and commenced as soon as possible. Until that time, the document represents only a statement of intent or consultation document pointing towards a comprehensive, integrated and funded transport and land use plan still to come.

• More specifically, the Associations support the extension of existing CityRail heavy rail lines to North West Sydney, within the CBD and as already announced, to South West of Sydney, rather than the short-sighted metro plans previously being advanced by the government. This builds on and enhances the existing established rail network rather than creating a whole new technology with questionable connectivity to existing services, and it will serve a larger proportion of the greater Sydney population than would be possible under the shorter metro line proposals.

• However, it is unacceptable for Western Sydney to have to wait until 2015 for the new express line and 2017 for construction of the North West Line to commence. With the CBD metro project now shelved, construction could and should immediately be shifted to the new heavy rail extensions, rather than forcing the people of western Sydney to wait another 5-7 years for any sign of new construction, let alone the much longer wait for these projects to be completed. For example, the North West Rail link has existing approval, the land is owned, detailed design work has already been undertaken and the corridor is preserved. Construction could commence almost immediately.

• We support the extension the light rail network into the CBD and to Dulwich Hill as logical and relatively inexpensive measures to assist in attracting new users to public transport, subject to appropriate consultation with local communities.

• The creation of a new Sydney Metropolitan Development Authority (MDA) to drive future transit-oriented development and urban renewal may go some way to address broader issues of strategic transport and land use planning in greater Sydney. However, there is a risk this may be restricted to key nodes of interest to developers while ignoring the larger transport and land use issues across the growth areas of Sydney. There are also broader concerns with a MDA within a local planning context. We have fears that the MDA concept will be used as a ‘top down’ planning entity, operating outside existing planning controls (similar to Part 3A projects), in isolation from the local planning context and riding roughshod over legitimate community concerns.

• The Transport Plan makes no mention of the need for a single overarching Sydney Transport Authority which could overcome the grossly inefficient plethora of government departments, agencies and planning authorities currently overseeing the planning and development of transport in Sydney. The creation of such an agency with appropriate independence and expenditure powers would also help ensure that transport plans such as this one are actually implemented. The Associations acknowledge recent moves to strengthen the role of the Department of Transport and Infrastructure and encourage the Government to further develop this agency’s role in the commitment to and delivery of transport infrastructure in Sydney and NSW as a whole. However, we note that this reform has been underway for more than 6 months with no significant changes evident in the delivery of transport outcomes for Sydney as yet.

• The Transport Plan still has a significant modal emphasis, rather than a place-centred planning approach, which would be more consistent with the broader approach being undertaken within the Metro Strategy.

Transport and Land-use Planning

Local Government has a key role in land use planning processes, particularly for new land release areas, and also in the design and provision of appropriate public transport infrastructure in town centres and on local roads. The issue of integrated transport planning, particularly in the context of regional and whole-of-state development, has long been a policy stance of Local Government in NSW. Policies need to address the appropriate application and integration of transport solutions in combination with land use and planning, environmental, institutional and behavioural factors in both urban and regional areas. Development of
integrated transport strategies that encourage investment and development in a whole of state context is critical to breaking down the divide between cities and regional areas of Australia. These policies must include committed investment in major infrastructure projects such as those outlined in various strategic planning and transport planning documents published over many years.

However, we are concerned that many of the important elements of these types of policies fall outside the direct responsibility of Local Government and require significant additional resources to achieve optimum outcomes. Nonetheless there is a vital role for our sector to encourage and work with the State Government to achieve positive planning outcomes that provide for genuine modal choice in our communities.

Local Government requires commitment to integrated transport and land use planning arrangements which provide for appropriate public transport access in new land release areas. We see the inclusion of public transport options as an essential component of development, but on the clear understanding that no commitments can be made without the provision of appropriate financial resources from the State Government.

Please note that a more detailed discussion on Local Government’s views of the overall Metro Strategy Review is made in a separate submission to the Minister for Planning, elements of which have been included in this submission and a full copy of which is included as an annexure.

**Transport Objectives, Modal Choice & Infrastructure Requirements**

The provision of appropriate transport infrastructure and services should underpin most if not all of the broader planning strategies for Sydney and regional areas of NSW. Local Government acknowledges that the complexity of the transport task in both urban and regional areas will continue to require an appropriate mix of existing transport modes, including heavy rail, light rail, bus, ferry, car as well as walking and cycling. In general terms each of these modes has a competitive advantage over the others for certain type of trips. For example, heavy rail has an advantage for medium-long distance trips, especially to large centres and along corridors of high demand, while cars have advantages where car and road-space is available, parking is available at the destination and flexibility of trip is required.

The key transport planning outcomes should therefore be to encourage and provide the choice of the right mode for the right trip. The equity issue is equally important as choice of mode is not available to many people, either because of their physical location or other reasons such as incapacity, income and the like. Attractiveness of public transport compared to private vehicles is also enhanced when other factors such as information, timetables, common ticketing systems, easy-to-use transport interchanges, integration of services within and between modes, and service frequency, cleanliness and safety issues are addressed as essential components of the overall transport planning task.

The Associations would therefore expect a public transport investment strategy to include not only a broad strategic direction for the integration of land-use and transport planning, but also financial commitment to specific transport infrastructure projects as a precondition to the approval of new land release areas or consolidation in existing areas. Such investment should include, but not be limited by, the transport projects outlined by the State Government over recent years and included in the latest Transport Plan. Local Government is a vitally important stakeholder in any of these proposals and would expect to be involved in the planning for enhanced transport infrastructure, whether it is for new roads, rail links, light rail, transitway/express bus lanes or pedestrian/cycle paths.

While it is not our intention to advocate particular transport options, councils within Sydney have indicated that a program of public transport priorities should include consideration of specific transport projects and issues including:

- The extension of existing CityRail heavy rail lines to North West and South West of Sydney and within the CBD, rather than the short-sighted metro plans that were being considered by the government. This builds on and enhances the existing established rail network rather than creating a whole new
technology with questionable connectivity with existing services, and serving a larger proportion of the greater Sydney population than would be possible under the shorter metro line proposals;

- The creation of a light rail network in the CBD and inner suburbs to address the road congestion currently being experienced in the CBD and adjacent areas, under the proviso that any reduction in direct bus services to the CBD should only be implemented when appropriate supplementary light or heavy rail networks have been established in their place;

- Provision of the already-planned additional strategic bus corridors and cross regional bus services and completion of the bus transitways and other bus priority measures;

- Provision of commuter car parking at major transport nodes;

- Setting of targets for environmental outcomes, related to urban transport;

- Integration of all modes of public transport so that they complement each other (including in some cases the private vehicle); provision of world-class transport interchanges and Intelligent Transport Systems for public transport;

- Development by State and Federal Governments of a comprehensive long term integrated land transport plan for the eastern seaboard which incorporates consideration of high speed rail, other heavy rail and freight transport through and within Sydney to substantially reduce travel times and alleviate impacts of freight movements on local amenity. This would also include improving access for regional areas to Sydney, for example from the Central West region over the Blue Mountains, and also opening up new rural and regional transport options such as the North South Inland Rail corridor as an alternative to sending all freight services through Sydney.

- The Transport Plan also says nothing about improving the passenger rail network to adjacent regional areas (i.e. Central Coast/Newcastle/Hunter, Wollongong/Illawarra, Southern Highlands, and Blue Mountains/Central West and the positive affect this would have on future Sydney population, development, transport needs. Consideration of appropriate new fast rail technology to some of these regions was flagged in the previous Transport 2010 Strategy and ought to be investigated both in terms of specific rail mode work programs and also broader alternative strategic planning strategies for greater Sydney.

**Freight Transport**

The Associations membership has raised numerous issues with the expanding freight transport task and the impact this is having on transport and planning aspects within Sydney and across the state as a whole. While the Transport Plan does mention some key freight projects, we are aware that a more detailed NSW Freight Strategy is being developed, and therefore we outline a range of freight-related issues affecting Local Government, i.e:

- A blanket approach to improving the economic aspects of freight efficiency does not always provide optimum outcomes for local communities – the process of addressing the efficient transport of freight needs to be appropriately managed to take into account the full range of impacts as well as benefits to the community as a whole, especially local communities. These include local road pavement, bridge, and road design impacts, road safety concerns (real and perceived), noise & amenity issues and congestion, parking and the need for rest areas.

- Given the impacts many councils need financial incentives and/or compensation to open up local road networks to heavy vehicles, either through increased direct grants from governments, access to road user charges (mass/tonne/km etc), or some mechanism to share in productivity improvements that the freight industry receive from higher productivity vehicles and pass on to their customers. In many cases this may represent only a relatively small investment to address key infrastructure needs.

- The need for consistent route assessment guidelines and procedures, for example from the national Transport Commission and Roads and Traffic Authority to assist.

- Consideration to handing back economically significant local roads to the State or Federal Government for their management and funding.
• Encouragement of rail freight transport in Sydney & regional areas through appropriate investment/incentives, or disincentives to the road freight industry. Local Government in NSW considers rail to be the most appropriate form of transport for bulk freight and supports incentives to encourage the use of rail in this context, including within the Greater Sydney area and especially for port access. This would have beneficial knock-on effects for other roads and transport users generally.

• The need for connectivity with the Metropolitan Strategy, State Infrastructure Plan, State Plan and relevant Federal Government freight transport policies.

• Needs forward planning so that councils can include likely future freight impacts in their IPR framework.

• The planned expansion of other ports such as Port Kembla for container and car imports will have further detrimental impacts on Sydney’s future transport requirements if done in isolation from broader transport and land use planning strategies – options such as transferring road freight to rail (e.g. by completing the Maldon to Dombarton and other freight-only lines) should be included for consideration in the transport blueprint process to address these potential pressures.

• Consideration of the needs of the freight industry in both individual developments (e.g. heavy and light commercial vehicle access to shopping centre loading docks etc) and in a more general strategic planning context (e.g. appropriate access roads, truck parking and break-up areas, driver rest areas etc). Related to this are the planning issues associated with appropriate ‘span of hours’ (i.e. approved opening hours) for industrial and warehouse type development to facilitate more efficient access by the freight industry.

Finance/Pricing

In general terms, Local Government advocates the consideration of the following broad financial and/or transport pricing issues as part of a robust public transport investment process:

• Policies and practices which actively seek to attract users away from cars and into public transport by addressing the key factors which influence modal choice, such as frequency, reliability, comfort, safety, value-for-money, modal connectivity, user information and appropriate investments in new or additional capacity (including better public transport services for non-metropolitan areas);

• Policies which encourage improved efficiencies in freight movement across the State, such as seamless intermodal links, appropriate terminals and associated facilities, dedicated freight routes through or around major cities or centres, upgrades to freight infrastructure such as rail lines and road bridges, and the use of technology to improve levels and quality of regulatory enforcement;

• Policies which improve access to Sydney for regional areas and address the disadvantages faced by rural communities, including appropriate levels of funding for regional infrastructure, new intra and inter regional transport links, improvements to existing transport options such as upgraded rail links, the establishment of key regional aviation hubs and the associated transport links to surrounding regional catchments;

• Alternative pricing regimes for some transport modes or investments should be explored as they can alter the relative advantages of one over another and therefore assist with regional development priorities;

• Provision of tax concessions for regular public transport commuters equivalent to those provided through the FBT system to employees with company cars;

• Review all Federal taxation and grant arrangements to ensure that they do not discriminate against the providers, operators and users of public transport and rail services;

• New funding models are required that allow for the long term funding of infrastructure and ongoing services required to meet Sydney’s increasing population. There are serious flaws and contradictions in the current State Government approach, with recent limits and thresholds on infrastructure contributions at both State and Local level, no long term commitment to infrastructure priorities, and rate pegging of local councils. In addition, we have concerns that the Transport Plan has ‘quarantined’ road funding at
existing levels, rather than using some of this existing non-local road funding to increase or expedite public transport investment;

- Fuel taxes, charges or levies, perhaps in conjunction with road user charges, could present further funding opportunities. Many councils are attracted to a greater degree of hypothecation of existing fuel taxes for transport infrastructure funding.

- Local Government in NSW is under increasing financial stress. It is becoming increasingly clear that the current financial base of NSW Local Government is inadequate to meet the growing demands being placed on it. Local Governments’ capacity to maintain existing services and infrastructure is already compromised. In many instances councils are being forced to cut services and defer critical infrastructure expenditure. The deficiency in infrastructure investment across Australia generally, is well documented. It is not an exaggeration to warn of a looming infrastructure crisis. Further demands placed on councils by rampant development pressures unsupported by appropriate transport infrastructure investment, will exacerbate this situation. Providing councils with alternative funding mechanisms would assist them to address specific local transport infrastructure pressures presented by the growing population needs of Sydney.

Conclusion

Local Government recognises the importance of public transport as a vital component of the overall transport task. The provision of public transport contributes not only to the long-term environmental and economic sustainability of our communities, but also provides vital access to those people in remote locations or in disadvantaged groups. The corollary to this is that the absence of effective public transport planning will leave Sydney increasingly dependent on private car-based transport, with all the negative congestion, environmental, social and financial impacts that brings with it, and in a situation totally unable to cope with the projected population growth targets.

We would like to take this opportunity to express our appreciation for the opportunity to provide the views of Local Government in NSW on the Transport Plan, and look forward to ongoing consultation. If you have any questions about our submission, please contact Richard Connors, Senior Policy Officer - Roads and Transport, on 02 9242 4073 or email: richard.connors@lgsa.org.au.