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Via email: engage.sritps@transport.nsw.gov.au

Draft Hunter Strategic Regional Integrated Transport Plan

Thank you for the opportunity to comment on the draft Hunter Strategic Regional Integrated Transport Plan (draft SRITP).

The Property Council champions the interest of more than 2,200 member companies representing the full spectrum of the industry, including those who invest, own, manage and develop property of all asset classes. The property industry shapes the future of our cities and regions – we have a deep long-term interest in seeing them prosper as productive and sustainable places.

The draft SRITP is the second version of a regional transport plan to be released for consultation since 2022, the first being the Draft Hunter Regional Transport Plan 2041 (draft HRTP). The Property Council's submission on the draft HRTP included feedback that Hunter Regional Plan 2041 had not at that time been released and we believed it was important to consider both concurrently to ensure alignment between these two key regional planning strategies. We also provided feedback that the scope of work listed under the headings of Delivery, In Planning and For Investigation lacked detail and we invited further consultation on these initiatives.

The draft HRTP was later withdrawn and stakeholders advised that a new approach would be taken in the subsequent draft SRITP that would better align with the Hunter Regional Plan.

The draft SRITP acknowledges the Hunter Regional Plan in its identification of regionally significant growth areas and its support for the development of housing near transport hubs and key corridors. However, there are still deficiencies in alignment with the Hunter Regional Plan and State Government housing policy - including the population projections, which are based on an older dataset than that used for the most recent Department of Planning Housing and Industry projections (NSW Common Planning Assumptions).

The draft SRITP comprehensively articulates the local challenges of transport in the Hunter but is still lacking delivery detail, which makes the document present as an aspiration rather than a blueprint to guide the delivery of transport priorities over the next 20 years.

We note there are fewer specific initiatives in the draft SRITP (57) than in the initial draft plan (94), with objectives beyond the 0-5 year time frame now captured in the much more generalised 'Longer Term Outcomes' section, which does not commit to specific time frames.

The Property Council has participated in briefings and workshops associated with the draft SRITP and appreciates the opportunity to provide feedback through those channels. This submission focuses on the draft SRITP's objective of supporting the delivery of well-located housing and successful places.

Transport's role in housing approvals

The draft SRITP identifies supporting the provision of well-located housing and successful places as one of its seven objectives and 34 of the 57 draft initiatives in Part 6 have an alignment with this objective. However, these initiatives are all largely focused on infrastructure delivery or improvements in public transport or active transport links. While these elements are important, the Property Council believes an omission in the draft SRITP is an acknowledgment of Transport's role in housing delivery as a key approval agency and the inclusion of corresponding initiatives focused on improving and streamlining assessment processes.

Cutting red tape and expediting housing approvals is a primary focus of the NSW Government as the State strives to meet its Housing Accord targets. These are fundamental objectives of reforms that have emerged from the Department of Planning Housing and Industry over the past 18 months, including the Transport Oriented Development (TOD) and Low and Mid Rise Housing programs, Housing Delivery Authority, NSW Pattern Book, NSW Housing Taskforce and the Housing Approval Reform Action Plan.

Transport for NSW is a major assessment agency for housing developments and feedback from industry indicates that projects are often held up by slow progress obtaining the necessary approvals from Transport or a lack of clear guidelines on developer requirements and responsibilities, particularly regarding infrastructure costs. We believe a focus in the draft SRITP on streamlining approval pathways and improving communication and interaction with applicants, councils and other government agencies would better position the draft SRITP to achieve its objective of supporting the delivery of well-located housing and successful places.

There is a precedent for this at regional level. The Transport Reference Group was formed in 2020 in response to industry and local government representations to improve Transport for NSW local services to unlock employment and housing developments stuck in the planning pipeline. The initiative involved local stakeholders including the Property Council, Hunter Joint Organisation, Business Hunter, Dantia, Committee for the Hunter and Urban Development Institute of Australia. It provided industry and local government with a platform for direct engagement with senior regional Transport for NSW staff and a collaborative approach to identifying and addressing issues associated with development-related assessments and processes.

The Transport Reference Group achieved a number of significant outcomes including:

- Creation of a dedicated Development Services division within Transport for NSW's Regional and Outer Metropolitan (ROM) division to facilitate faster assessments and address blockages in the system
- Commencement of a review of the Works Authorisation Deed (WAD) process to deliver faster outcomes
- A reduction in the bank guarantee requirement for WADs

Resolution of issues that were delaying specific projects.

While the Transport Reference Group is no longer actively meeting, industry stakeholders who were involved have provided positive feedback about the outcomes achieved and there is a strong view that a similar forum should be revisited to facilitate ongoing solutions-focused dialogue between industry and Transport on issues associated with development assessment.

Initiatives the former group had begun to work on that provide scope for further discussion include the acceleration and release of corridor studies and the development of a priority list for infrastructure that will facilitate the delivery of housing and employment lands.

Recommendations:

- The draft SRITP include an acknowledgement of the importance of Transport for NSW's
 role as a development assessment agency and commits to ongoing process improvement
 to ensure approval pathways are streamlined and barriers to housing delivery addressed.
- 2. The draft SRITP commits to the formation of a stakeholder group that will facilitate ongoing engagement with regional industry and local government stakeholders on issues associated with development assessments and processes.

Implementation

The Property Council received strong feedback from members that the draft SRITP needs to be bolder on project identification and delivery time frames. While the document delivers a vision for an enhanced transport network, it should be supported by an implementation plan that sets out infrastructure and service delivery priorities.

The draft SRITP states on page 16 that it "aims to streamline the transport project planning process and provide regional stakeholders and communities with an understanding of short to medium-term transport priorities for the Hunter". We do not believe the document achieves this in its current form. We note there is an undertaking in the draft SRITP to undertake work "immediately after the final release to provide Hunter region stakeholders and communities with assurance around the short to medium term transport priorities", however it is the view of members that these assurances should be in the draft SRITP.

We acknowledge that the challenge of having to rely on funding decisions of future governments means delivery targets cannot always be met but it is important for a regional plan to set clear priorities that can be the referenced by industry and local communities in their advocacy. This includes setting optimum time frames for specific project delivery.

Recommendation:

3. Actions and initiatives in the draft SRITP should be supported by a Delivery Plan.

Public transport

The Property Council supports the draft SRITP's focus on encouraging greater use of public and active transport through infrastructure and service delivery but cautions that this ambition should be balanced with the reality of low public transport use in the region. Public transport use across the Hunter is only about four per cent of trips and that level has not changed substantially over many years despite improvements such as the addition of light rail services and the

comprehensive review of regional routes, timetables and network integration that took place when the Newcastle bus service was privatised.

Changing commuter habits to favour public transport will take time and a concerted effort and the needs of private car users should continue to be considered in coming decades, particularly those living in newer land release areas. The draft SRITP has a vision for new growth areas to be "served with safe roads and public transport from day one" but there is no detail on how this worthy ambition might be achieved.

There is a positive focus on improving connections to essential services and workplaces – particularly for health and education trips and to support the visitor economy. The acknowledgement of the need to improve public transport connections to Newcastle Airport is welcome.

Expansion of the Newcastle light rail service does not appear to be a priority in the draft SRITP, with the only stated initiative being to "preserve the transit corridor between Newcastle Interchange and Broadmeadow". The lack of a clearer plan for light rail extension seems a significant omission in a strategy document with a 20-year horizon, especially given the recent release of the Broadmeadow Place Strategy and the importance of connecting that expansive urban renewal hub to the CBD. With the forecast growth of the John Hunter Hospital precinct and the draft SRITP's aim of better servicing health trips by public transport, it would also seem to be a missed opportunity to not be planning for light rail extension to this significant health and employment precinct, and potentially to the University of Newcastle to further support education and employment travel.

Recommendations

- 4. The draft SRITP should outline in more detail how public transport improvements to connect residential growth areas and better service employment, health and tourism hubs can be achieved.
- 5. Extension of the Newcastle light rail service should be explicitly prioritised, with connection to Broadmeadow an immediate initiative and potential connection to the John Hunter Hospital and University of Newcastle listed as future objectives.

Infrastructure

The Property Council is concerned that the draft SRITP does not provide in detail a more extensive list of infrastructure projects that will enable housing delivery. While some significant projects are listed - including upgrades to Newcastle Link Road, the New England Highway at Maitland, Hillsborough Road, Nelson Bay Road and Speers Point roundabout - industry would like to see a more comprehensive list of road and intersection projects, with target delivery time frames.

Similarly, infrastructure needs to support increased housing and population density around TOD stations is acknowledged superficially but not addressed in any detail - and not in regard to all stations. Morisset and Cockle Creek are singled out for station upgrades but infrastructure improvements will likely be necessary at all stations if TOD housing projections are realised.

We support the initiative to preserve opportunities for re-use of mining industry transport infrastructure, including the rail corridor between Maitland and Cessnock and the Western Lake Macquarie Coal Haulage Road. These corridors provide opportunity to improve freight movement and commuter connectivity and support residential development in regional growth areas. We

believe engagement with the infrastructure owners to develop a plan for future reuse should be a high priority in the draft SRITP, ensuring the assets can be secured before they deteriorate and their use incorporated into future network plans.

Recommendations:

- 6. Transport for NSW should work with industry and local government to develop a more comprehensive priority list of enabling infrastructure to support housing with target delivery time frames.
- 7. Transport for NSW should work with infrastructure owners to progress the acquisition and repurposing of mining-related transport infrastructure that is no longer in use or soon to come to the end of its industry life.

Freight movement

The draft SRITP acknowledges the importance of providing road and rail freight connections to support the growth of new industries, including renewables, and the expanding freight hubs of Newcastle Port and Airport. These routes are also critical to unlocking new industrial and employment lands. However, there is scope for a deeper discussion about links between zoned and planned employment lands, road and rail networks and the potential for intermodal facilities.

The document acknowledges the delivery of the Lower Hunter Freight Corridor as being critical to both accommodating the region's future freight task and benefiting the supply of housing in the region through the removal of freight trains on the Main North Line between Fassifern and Newcastle. However, the action table only prioritises concept and design. It is industry's view that this project should be progressing more quickly to implementation and the inclusion of project delivery as an objective within the 20-year time frame of the draft SRITP would make a stronger statement about its importance and urgency.

Recommendation:

8. Delivery of the Lower Hunter Freight Corridor should be a higher priority in the draft SRITP.

High speed rail

The Property Council is pleased to see an acknowledgement of high speed rail in the draft SRITP, albeit at high level. While we acknowledge the funding decision for this catalytic future development sits with the federal government, high speed rail has the potential to significantly reshape transport patterns and requirements within the region so needs to be considered in future planning.

List of recommendations

- 1. The draft SRITP include an acknowledgement of the importance of Transport for NSW's role as a development assessment agency and commits to ongoing process improvement to ensure approval pathways are streamlined and barriers to housing delivery addressed.
- 2. The draft SRITP commits to the formation of a stakeholder group that will facilitate ongoing engagement with regional industry and local government stakeholders on issues associated with development assessments and processes.

- 3. Actions and initiatives in the draft SRITP should be supported by a Delivery Plan.
- 4. The draft SRITP should outline in more detail how public transport improvements to connect residential growth areas and better service employment, health and tourism hubs can be achieved.
- 5. Extension of the Newcastle light rail service should be explicitly prioritised, with connection to Broadmeadow an immediate initiative and potential connection to the John Hunter Hospital and University of Newcastle listed as future objectives.
- 6. Transport for NSW should work with industry and local government to develop a more comprehensive priority list of enabling infrastructure to support housing with target delivery time frames.
- 7. Transport for NSW should work with infrastructure owners to progress the acquisition and repurposing of mining-related transport infrastructure that is no longer in use or soon to come to the end of its industry life.
- 8. Delivery of the Lower Hunter Freight Corridor should be a higher priority in the draft SRITP.

The Property Council appreciates the opportunity to contribute to this consultation and welcomes further engagement. Should you require more information on any of the matters raised in this submission please contact NSW Deputy Executive Director Anita Hugo at ahugo@propertycouncil.com.au.

Yours sincerely,

Amy De Lore

Hunter and Central Coast Regional Director Property Council of Australia