



Ms Carolyn McNally
Secretary
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms McNally,

I refer to the release of the *Draft South East and Tablelands Regional Plan* placed on public exhibition on 23 May 2016. Transport for NSW appreciates the opportunity to provide feedback on the draft Plan to help shape the future of the South East and Tablelands region.

Transport for NSW has reviewed the draft Plan and supports its vision and the actions identified.

In March 2014, Transport for NSW released the *Southern Regional Transport Plan*. This Plan provides the strategic direction for the delivery of transport infrastructure and services for the Southern region. Since then, key projects Transport for NSW has undertaken within the region have included:

- Upgraded and maintained 901 bridges at a cost of \$21 million;
- Spent \$12.7 million on road safety improvements;
- Granted Eurobodalla Shire Council \$241,210 to progress upgrades for DDA compliant public transport infrastructure;
- Completed an upgrade at Mittagong station and a new bus interchange for regional school buses at Queanbeyan; and
- Road upgrades, including \$854,000 for the Lower Bendoc Road in Bombala and \$675,000 for the replacement of Abercrombie River Bridge on Oberon Road in the Upper Lachlan Shire.

Transport for NSW appreciates the ongoing involvement and collaboration with the NSW Department of Planning and Environment in delivering the actions within the *Southern Regional Transport Plan*.

Transport for NSW has provided detailed comments on the *Draft South East and Tablelands Regional Plan* in Attachment A. Should you wish to discuss anything further, please contact Simon Hunter, Executive Director, Transport Strategy, on (02) 8202 2577 or via email at simon.hunter@transport.nsw.gov.au.

Yours sincerely

Clare Gardiner-Barnes
Deputy Secretary
10 Oct 16

**Draft South East and Tablelands Regional Plan
Transport for NSW – detailed comments**

- **Throughout**

- Suggested changes:**

- Much of the focus in the Draft Plan is around transport in and out of the ACT. There is little focus on regional centres such as Bega, Batemans Bay and Young. Improvement in local transport networks will have a significant impact on the ability of those communities to access local services, employment etc.
 - Point to Point service reform is not mentioned and should be included.
 - There is minimal comment on the freight network in the Draft Plan. Improving the productivity of the freight network is a priority for the South East and Tablelands Region. Freight travelling through the region connects to the Illawarra and Port Kembla, Port Botany, the ACT, the Central West and Western NSW. There is a need to ensure that the road network supports higher productivity vehicles (HPV), which includes reducing height and weight restrictions on major routes.

- **p. 6: Evidence to underpin this plan**

Suggested change: This section should acknowledge the Draft Australian Capital Territory and New South Wales Memorandum of Understanding for Regional Collaboration (Dec 2011) (see: <http://www.cmd.act.gov.au/policystrategic/regional/nsw>) and clarify actions to deliver the MOU key priorities. The last update on actions from 2012 reported on the *Greater Capital Region Strategy*, a cross-border initiative that takes a place-based approach for the ACT-South East NSW region. It is centred on maximising economic development through improved cross-border coordination. Stage 1 of the strategy process included an analysis of the current strategic planning documents and studies to identify common issues and economic opportunities that can be enhanced through better cross-border integration. This work should be cited as important evidence to underpin the Draft Plan.

- **p. 49: Action 3.3.2**

Suggested change: The role of Woodlawn as the repository of Sydney's waste should be highlighted, noting volumes railed will increase as both landfill capacity is consumed and the metropolitan population grows. If landfill waste from Canberra is likely to go to Woodlawn, there are planning issues that need to be addressed, including requiring rail haulage and eligibility for grants from the NSW Waste Levy.

- **p. 49: Action 3.3.2**

Suggested change: The strategic role of the Marulan quarry precinct in supplying construction materials should be highlighted, including policy to preference trunk haul by rail.

- **p. 57: Direction 3.4**

Suggested change: The Port of Eden services the NSW South East Hinterland and South Coast and is home to one of the largest fishing fleets in NSW. The Port's major trade is the export of woodchips, supplemented by exports of softwood logs and general cargo. There is need for an action to maintain freight connections to support economic productivity in the region, including to the Port of Eden.

- **p. 58: Action 3.4.1**

Suggested change: Need an additional 'Action' to protect port related industrial activities at the Port of Eden (see page 118 of the NSW Freight and Ports Strategy) from encroachment.

- **p. 61: Goal 4**

Suggested change: Need to add a waste management section. The substantial business activity and population growth (up to 48%) forecast in the region means waste flows will increase significantly. 'Resource recovery' strategies extend landfill life while increasing complexity of the associated transport task. Waste and Resource Recovery should be coordinated across the Region, especially for major facilities and 'line-haul' transport.

- **p. 66: Direction 4.3** - "Councils are encouraged to identify their own centre hierarchies that set out the centres, towns and villages that service local communities. For example, it would be appropriate for major towns such as Cooma, Jindabyne, Merimbula, Mittagong, Moruya, Moss Vale, Narooma, Yass, and Young to be recognised for their strong district functions."

Suggested change: A consistent approach to centres planning is required across all metropolitan plans and regional plans as an essential component of land use and infrastructure (including transport) planning. It is not appropriate for councils to identify their own hierarchy as this will make regional plans inconsistent. This Draft Plan mentions a further 'centres hierarchy' of 'districts' but this is not further defined as far as key functions compared to 'Metropolitan City' and 'Regional City' or 'Regional Centre'.

- **pp. 66-67: Action 4.3.1**

Suggested change: Action 4.3.1 discusses the NSW Government's preference to place retail activity into existing centres. The concern with the current text in the Draft Plan is that it does not reference 'Local Planning Direction 3.4 Integrating Land Use and Transport' which applies to all planning authorities, including councils in NSW. This Direction applies when a relevant planning authority prepares a planning proposal that will create, alter or remove a zone or a provision relating to urban land, including land zoned for residential, business, industrial, village or tourist purposes. Notably, a planning proposal must locate zones for urban purposes and include provisions that give effect to and are consistent with the aims, objectives and principles of:

(a) Improving Transport Choice – Guidelines for planning and development (DUAP 2001);
and

(b) The Right Place for Business and Services – Planning Policy (DUAP 2001).

The above two documents formed part of draft SEPP 66 published in 2001. Draft SEPP 66 was never gazetted.

The Right Place for Business and Services lists a hierarchy of major urban centres, provides direction for specific land uses and aims to locate higher trip-generating development within accessible centres. When this is not possible because of the constraints of urban structure, redevelopment opportunities or local circumstances, alternatives may be accepted when a 'net community benefit' can be clearly established. Given the current status of Local Planning Direction 3.4 Integrating Land Use and Transport and the above two documents as considerations in all planning proposals, it is inappropriate to paraphrase these documents in the Draft Plan in any way as this will impact statutory interpretation to planning proposals.

- **pp. 66-67: Action 4.3.1**

Suggested change: The Department of Planning and Environment's Retail Expert Advisory Panel will consider 'Local Planning Direction 3.4 Integrating Land Use and Transport' as part of its role to advise on appropriate reforms to improve the planning system for retailing and encourage competition and retail investment in NSW. This current drafting of Action 4.3.1 should acknowledge this work is underway and may change the NSW Government's retail policy approach applicable in all centres, including regional centres and regional cities.