

31 May 2024

Strategic Transport Planning team
Transport for NSW

RE: Transport for NSW draft 2024 Guide to Transport Impact Assessment.

The Urban Development Institute of Australia NSW (UDIA) is the state's leading development industry body. We represent the leading participants in the industry and have more than 450 members across the entire spectrum of the industry including developers, financiers, builders, suppliers, architects, contractors, engineers, consultants, academics and state and local government bodies.

UDIA invests in evidence-based research that informs our advocacy to state, federal and local government, so that development policies and critical investment are directed to where they are needed the most. Together with our members, we shape the places where people will live for generations to come and in doing so, we are city shapers. In NSW alone, the property industry creates more than \$581.4 billion in flow on activity, generates around 387,000 jobs and provides around \$61.7 billion in wages and salaries to workers and their families.

UDIA welcomes the opportunity to make a submission to the Transport for NSW (TfNSW) draft 2024 Guide to Transport Impact Assessment (draft Guide).

Our primary concern is the lack of transparency justifying the changes to the trip generation rates for low density development. For example, we note that the low density development regional trip generation rates have increased over the rates used in the Traffic Surveys Technical Direction (TDT 2013/4a), however the methodology for the changes is not clear. Given the significant implications these rates have for requirements on proposed development, UDIA requests publication of the analysis and justification supporting the updated trip generation rates.

UDIA makes the following comments for Transport for NSW's consideration.

For low density residential development:

- The Draft Guide has arrived at new trip generation rates that are different from both the existing Guide to Traffic Generating Developments (2002) and the TDT 2013/4a (Traffic Surveys Technical Direction) and introduces different rates for Sydney vs Regional. The 2002 Guide uses a trip generation rate of 0.85 across the board. The TDT 2013/4a (Traffic Surveys Technical Direction) uses rates between 0.71 and 0.99 at different times and between Sydney and Regions.
- Section 5.6 of the Draft Guide references Section 8 of the TfNSW Trip Generation Surveys Low Density Residential Analysis Report dated 26 October 2022. This report outlines the studies and modelling undertaken to arrive at the recommended trip generation rates for low density development. This work was based on “a small sample of survey sites for each land use” across NSW that take into account Sydney as well as the regions. Page 47 of the Trip Generation Analysis Report states:

“Based on the above, the recommended trip generation rates for Low Density residential developments are:

- Weekday peak 1 hours (AM and PM): 0.75 trips per dwelling
- Weekday peak 1 hours (midday period): 0.72 trips per dwelling
- Daily (weekday and weekend-day): 8.0 trips per dwelling”

- The draft Guide to Traffic Impact Assessment then provides Table 5.3 which uses different rates that are split into Sydney and Regional, as well as providing two methods for assessment, being a shortcut rate and an average rate. None of the rates in the draft Guide align with the recommended 0.75 rate recommended in Trip Generation Analysis Report. It is unclear why they are different.
- Below is a comparison between Table 5.3 of the 2024 draft Guide vs the TDT 2013/4a (Traffic Surveys Technical Direction) vs the 2002 Guide. The draft Guide rates for Sydney are lower than the TDT 2013/04a. The draft Guide rates for Regional are higher than the TDT 2013/04a. None of the updated rates align with the 0.75 rate recommended in the Trip Generation Analysis Report.

Type	Document	Sydney			Regional		
		Daily	AM	PM	Daily	AM	PM
	2002 Guide	9	0.85		No Distinction Syd/Regional		

	TDT 2013/04a	10.7	0.95	0.99	7.4	0.71	0.78
Low Density Residential	2024 Draft Guide (average rate)	8.12	0.68	0.77	7.53	0.83	0.84
	2024 Draft Guide (shortcut rate)	10.58	0.83	0.91	9.17	0.93	0.94

The trip generation rates are used to determine the type and scale of any road upgrades required for proposed development. The outcome is critical to ensure that the road network operates safely and efficiently, without unnecessarily overburdening the cost of delivering new homes and employment areas. Given the Trip Generation Analysis Report was based on “a small sample of survey sites for each land use”, we are concerned there may not be adequate rigor behind the new rates.

To promote transparency and understanding within industry, and ensure cost-effective project delivery, UDIA requests more supporting information detailing how the trip generation rates were determined.

Conclusion

Thank you for the opportunity to provide a submission to the exhibition. Should you have any further questions regarding the comments contained within this submission, or to arrange a meeting, please contact Harriet Platt-Hepworth, Acting Director of Policy and Research at hplatthepworth@udiansw.com.au or 0474772291.

Kind regards,



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