

Strategic Transport Planning team  
Transport for NSW  
Sydney NSW 2000

Via email: [gtia@transport.nsw.gov.au](mailto:gtia@transport.nsw.gov.au)

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Dear Transport for NSW,

### **Draft Guide to Transport Impact Assessment**

Thank you for the opportunity to provide feedback on the Draft Guide to Transport Impact Assessment (the 'GTIA').

Bicycle NSW has been the peak bicycle advocacy group in NSW for over forty-eight years, and has more than 30 affiliated local Bicycle User Groups. Our mission is to 'create a better environment for all bicycle riders', and we support improvements to facilities for pedestrians and cyclists. Bike riding provides a healthy, congestion-reducing, low-carbon form of travel that is quiet, efficient and attractive for all ages with the correct infrastructure design.

**Bicycle NSW is very supportive of work undertaken to update the 2002 Guide to Traffic Generating Development with a new document that directs the development sector to account for all modes, including public transport, walking and cycling.**

However, we wish to raise some **concerns** and make **recommendations** for the final GTIA:

#### **Concern:**

Despite efforts to give more weight to sustainable modes, the draft GTIA is still very focused on historic levels of car traffic and parking. It is clear that 'predict-and-provide' planning will not create the vibrant, walkable cities people want – and which are urgently needed for sustainable growth and a decarbonised transport system.

'Vision-and-validate' is the bedrock of Transport for NSW's own Future Transport Strategy, and response E2.2 aims "to stabilise traffic levels in Greater Sydney". But the trip generation data and parking rates set out in the draft GITA assume that legacy car use will continue.

#### **Recommendation:**

- Ensure that a 'vision-and-validate' approach is clearly embedded in the GTIA, in alignment with the Future Transport Strategy.
- Desired place outcomes must be established, and the space and access allocated for cars adjusted accordingly. In highly accessible locations, this may mean very low or zero provision for private car use and storage.

#### **Concern:**

Although car parking reference rates are a step forward from the minimums prescribe in the 2002 document, the reference rates are still too high. Parking 'demand' is largely influenced by supply. Much current demand is fueled by legacy levels of supply. It is not a given. To drive down the desire to own and drive private cars, it needs to be harder to park, and relatively easier to access bikes, public transport, and car share.

We are pleased that reference rates can be challenged or replaced by rates specified in other relevant planning instruments. However, reference rates are likely to become 'default', particularly for smaller developments looking for a streamlined assessment process. Strangely, the reference rates for high density residential are unchanged, despite the new metro, light rail and bus infrastructure coming online.

Developments will continue to provide too much car parking to achieve the outcomes that all levels of government hope to achieve - Net Zero, healthier citizens and more liveable cities.

In addition, the parking rate categorisation by SA1 is too broad, with many SA1 areas covering a wide range of contexts. And there are no stated requirements for bike or car share parking.

### Recommendations:

- Abolish parking minimums in highly accessible locations. Parking reform is underway in many parts of the world with transformative impacts on development feasibility and mode split. We urge Transport for NSW to be **bold!**
- Apply maximum parking rates for Categories 1 and 1A, and include guidance in the GTIA on setting appropriate maximums for different types of development.
- Use SA1 analysis to set categories for parking to ensure a more granular response to context.
- Direct developers to unbundle and decouple parking supply to maximise flexibility and consumer choice.
- Allow the use of existing off-site parking before building more – particularly the inflexible underground parking common in denser precincts. It is then easier to repurpose parking spaces once market and behaviour adjust, or other mode options become available.
- Prescribe that parking spaces for bikes, car share vehicles, EVs and smaller vehicles are allocated prime locations in a development/precinct to incentivise use.
- Embed high bike parking rates for resident, working and visitor bike parking in the GTIA. Bike storage should be at ground level where possible with convenient step-free access and adequate security.

### Concern:

Although the guidance on Travel Demand Management and Travel Plans is very welcome, there is little information to help developers influence future mode shift beyond controlling parking provision.

### Recommendation:

- Journeys do not start and finish within a development site. The future uptake of active and public transport relies on infrastructure and networks within a much larger catchment. It is important to upgrade these to achieve the desired outcomes in the Travel Plans.
- Guidance should be provided on how to engage with Transport for NSW, local councils and service providers, and navigate possible funding mechanisms, to achieve necessary improvements.

### Concern:

The datasets for trip generation are inconsistent and missing key data for modelling. Cycling is completely missing for the mode share summaries for 'high density residential with high public transport accessibility' (5.12), 'shopping centres' (5.28), 'hardware stores' (5.37) and even 'schools' (5.60, 5.61)! For 'boarding houses' and some other categories, walking and cycling are combined.

Although practitioners are asked to use the best available data, the tables in the GTIA are likely to become the 'default' source. There is a risk that bike riding will not be measured, accounted for, or encouraged.

Even worse, the percentages for different modes are based on surveys of current behaviour – not what is needed to decarbonise transport. Again, these mode shares can be challenged but it is likely that many practitioners will not attempt to make changes, and the status quo of too much driving will be perpetuated.

**Recommendation:**

- Refresh the datasets to include current and desired cycling levels.
- Ideally the mode split for different contexts will reflect what is needed to reach Net Zero. The Climate Council calculated in [Shifting Gear](#) that no more than 36% of trip should be taken in a car by 2030, half the current rate of around 80%. The car rates will vary by location and development type, but should average at 36% or less. This is radical - and necessary to rapidly cut transport emissions.
- Trip chaining and non-work trips should be accounted for, and all transport modes within 1km of a site need to be part of the calculations – including trains, bike share, car share and ride share. These are currently ignored by most summary tables.

The GITA is an important document with a huge responsibility for setting the future transport system in NSW. It must counter the entrenched bias of the development industry to cater for a high car mode share. Developments should plan for walking and cycling first and ensure that sustainable modes are prioritised at every phase of the planning, design and assessment process. We look forward to reading the final version of the GITA and seeing better, more sustainable transport planning for developments of all scales in the future.

Please do not hesitate to contact Bicycle NSW if we can provide any further assistance at this stage.

Yours faithfully,



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