

## NeW Space – Detailed Response to Submissions

Issue	Comments	Proponent's Response
<b>Department of Planning and Environment</b>		
Car Parking	Further justification for reduced car parking, including further details regarding timing of delivery of improvements to public transport and any additional short or medium term measures required prior to such public transport improvements, such as improved shuttle bus service between campuses and additional parking at the Callaghan campus;	A detailed response to this issue is provided in the Response to Submissions Report and is supported by the Travel Demand and Parking Analysis prepared by SECA and provided at <b>Appendix C</b> .
Conservation Management Plans	Additional consideration of the conservation management plans that apply to the heritage items on the site	An amended Statement of Heritage Impact (SoHI) is provided at <b>Appendix D</b> of the Response to Submissions Report.
Noise	Further details regarding potential noise generation and requirement for any potential noise mitigation measures.	An amended Noise and Vibration Assessment is provided at <b>Appendix E</b> of the Response to Submissions Report.
<b>Transport for New South Wales</b>		
Dedicated Bus Lanes on Hunter Street	Hunter Street is planned for light rail, consequently there will be insufficient space for dedicated bus lanes. TfNSW advises that a limited number of buses would continue to use Hunter Street.	Noted.
	Dedicated Bicycle lanes on Hunter Street are not included in the City of Newcastle Cycle Plan which does not indicate cycle routes on Hunter Street. With the planned light rail lines and stops on Hunter Street, there will be insufficient space for dedicated cycle lanes. TfNSW advises that on road cycling will still be possible.	Noted.
Construction Traffic and Pedestrian Management Plan	TfNSW requests that a Construction Pedestrian and Traffic Management Plan (CPTMP) be prepared prior to the commencement of construction.	A Construction Pedestrian and Traffic Management Plan will be prepared prior to the commencement of construction on the site.
Draft Hunter Regional Transport Strategy	The Hunter Regional Transport Plan (RTP) is no longer a draft document. The final Hunter RTP was released March 2014.	Noted.
	The EIS partially listed the suite of local initiatives to support the revitalisation of Newcastle including promoting a shift to public transport, creating a connected pedestrian and cycling network and providing dedicated bicycle lanes on Hunter Street. The Hunter RTP also includes improving the efficiency of the road network and managing the impact of car parking.	Noted.
Newcastle Urban Renewal Strategy	<p>The documents in relation to Newcastle Urban Renewal Strategy have been updated since the release of Newcastle Urban Renewal Strategy 2012. TfNSW requests that the Transport Access Strategy refers most up to date Newcastle Urban Renewal and Transport Programme documents produced by Urban Growth in 2014 and Transport for NSW such as:</p> <ul style="list-style-type: none"> <li>- Revitalising Newcastle Fact Sheets July 2014 Light Rail from Wickham to the beach.</li> <li>- Revitalising Newcastle Fact Sheets August 2014 Interim Transport arrangements.</li> </ul>	Noted. These updated documents have been utilised in the Supplementary Car Parking Assessment and Response to Submissions Report.

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<b>Car Parking Information</b>	Transport Access Strategy refers to car parking surveys undertaken in 2006 and 2008. City of Newcastle Council has just completed Parking Surveys July 2014. TfNSW requests that the Transport Access Strategy refers latest car parking survey information.	The July 2014 parking study is not publically available and has therefore not been included in the Transport Access Strategy. The Transport Access Strategy utilises the most up-to-date publically available information.
<b>Newcastle City Council</b>		
<b>Transport and Accessibility</b>	Question the validity of the assumption that despite there being up to 2,347 people on the NeW Space campus, the development will not generate any demand for the provision of on-site parking spaces.	An updated Travel Demand and Parking Analysis has been prepared by SECA and provided at <b>Appendix C</b> . This Analysis details the revised assumptions for the project.
	There appears to be an underlying presumption that there is an existing availability of public car parking that can cater for the NeW Space proposal.	There is no underlying presumption that there is an existing availability of public car parking that can cater for the NeW Space proposal. Despite this, it is highlighted that there are approximately 2,500 underutilised spaces in the Newcastle CBD. As such, any staff/student demand from the NeW Space development would easily be satisfied and would not unduly reduce the supply of car parking to other uses within the CBD.
	The reports seeks to justify the parking demand generated by the development on the basis of the proposed parking quantum, as opposed to a calculation of likely peak parking demand based on worst case staff and student numbers with concessions for public transport use, walking, cycling and car sharing.	An updated Travel Demand and Parking Analysis has been prepared by SECA and provided at <b>Appendix C</b> . This Analysis details the revised assumptions for the project, including the manner of calculating parking demand.
	More emphasis needs to be placed on the parking situation in the relevant CBD precinct (as opposed to the whole CBD), the realities of ongoing private vehicle use that will apply in at least the short to medium term and corresponding review of road network performance is required.	There is no need to undertake an analysis of parking capacity in the immediate CBD precinct as the demand of staff/students will be accommodated through a mix of strategies such as park n ride facilities and carpooling.
	In terms of the parking situation in the relevant CBD precinct, consideration needs to be given to factors such as: <ul style="list-style-type: none"> <li>- The identified impact of the Law Court Building on the availability of public parking spaces.</li> <li>- The availability of parking at the Gibson Street parking situation, having regard for the current situation and for the reduced availability of parking at the parking station if an approved commercial development on the site proceeds.</li> <li>- The availability of on-street spaces in the precinct.</li> <li>- The current propensity for workers in the precinct to park in the streets of adjoining residential areas and the potential amplification of this issue.</li> <li>- The likely impacts of the routes of the proposed light rail system and express bus lanes on the availability of on-street parking spaces in the precinct.</li> <li>- The provision of a set down bay in front of the subject site (presumably for taxis) and the provision of motorcycle parking areas. (These facilities should be provided on-site so that Council is not burden with the ongoing maintenance costs).</li> </ul>	Refer to comment above.
	An analysis of the postcodes of the residential location of 2013 Law and Business Facility student registrations has revealed that 60% of the current students live within walking or cycling distance of the future NeW Space. There is no indication of the cycling distance parameter used to inform this statement.	This zone has been defined in the updated Travel Demand and Parking Analysis has been prepared by SECA and provided at <b>Appendix C</b> .

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	The expectations regarding the number of students and staff who will walk to the NeW Space campus are unrealistic. While parking constraints in the CBD may encourage walking, it is considered that the walking option will not be seriously considered by most people once the travel distance exceeds one kilometre.	The definition of the Active Transport Zone and the assumptions applied to staff/students in this zone are based on previous experience and known travel behaviours. There is a desire to discourage the use of private motor vehicles through minimising car parking, therefore requiring staff/students to adopt an alternative mode of transport.
	The reports do not consider or discuss the affordability issues associated with living in the ATZ and the likely timeframes between establishment of the facility and the achievement of the envisaged supply of accommodation. It is considered the percentage of staff and students living in the ATZ will be considerably less than that stated in the reports.	The travel demand analysis has assumed that the dwelling target established in the Newcastle Urban Renewal Strategy will be achieved in addition to recent development approvals which will deliver more housing and challenge affordability issues.
	On-site car parking requirement of one space per 60m <sup>2</sup> of Gross Floor Area is a concession in the CBD area, already recognising the availability and use of public transport legitimate transport mode for the area.	This rate is considerably high given the location of the site in the centre of the Newcastle CBD. This rate is also inconsistent with several of the key objectives in the Newcastle LEP 2012 and State Government policies, as further discussed in Section 4.5 of the Response to Submissions Report.
	The reports have carried out a road network assessment based on the proposed supply of 5 on-site parking spaces. This assessment is considered to be flawed, given that based on the recommended car parking supply of 208 spaces a traffic generation rate of 400 vehicles per hour during peak period could be reasonably assumed for assessment purposes.	The assessment has been carried out on the proposed number of spaces, rather than the inflated rate proposed by Council. This is appropriate given the proposed number of spaces would be the end outcome of the development.
	Little weight can be given to the anticipated high percentages of public transport usage stated in the reports.	There is a wide range of transport services provided in the Newcastle CBD. These are to be bolstered by the provision of the Newcastle Light Rail. As such, it is not understood why Council do not believe much weight can be given to the use of public transport.
	The reports mentions 'share cars'. While such vehicles provide a useful way of reducing car parking requirements at residential developments, they still generate a parking demand at any destination end point.	Noted. The reference to car share acknowledges that there are opportunities for car share providers to enter into agreements with Council to utilise currently vacant car parking spaces within the Newcastle CBD. No car share scheme is proposed as part of the NeW Space development.
	<p>It is anticipated the development will:</p> <ul style="list-style-type: none"> <li>- Create more competition for existing public car parking spaces and on-street car parking both in the CBD (price time restricted) and in the residential areas adjoining the CBD.</li> </ul>	The projected demand for parking has been satisfied through a mixture of strategies; therefore competition for car parking spaces in the Newcastle CBD will not be increased. Furthermore, there is a considerable number of underutilised spaces in the Newcastle CBD, ensuring that any staff/students who park in existing spaces will be accommodated with a vast number of spaces still available to other users.
	<ul style="list-style-type: none"> <li>- Lead to further encroachment of on-street parking into the suburbs of Cooks Hill, The Hill, Bar Beach, Hamilton, Hamilton South and Wickham to the detriment of the residential amenity.</li> </ul>	The projected demand for parking has been satisfied through a mixture of strategies ensuring spill over parking into adjoining suburbs is unlikely to occur.
	<ul style="list-style-type: none"> <li>- Diminish the supply of available and convenient parking in the vicinity of the subject site and with no improvement in public transport services and facilities some small businesses would relocate outside the CBD; contrary to the strategy for the revitalisation of the CBD.</li> </ul>	There is a significant improvement to public transport being undertaken by Transport for New South Wales in the form of the Newcastle Light Rail Line. As stated above, the demand for parking of the NeW Space development will be satisfied with alternative strategies and no impact will occur on existing convenient parking.

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	<ul style="list-style-type: none"> <li>- Exacerbate existing traffic congestion as a result of circulating traffic, including those of staff and students, seeking parking spaces.</li> <li>- Lead to an increase in illegal parking activity in the vicinity of the subject site further deteriorating the safety and efficiency of the local road network.</li> </ul>	<p>The projected demand for parking has been satisfied through a mixture of strategies off-site, ensuring that traffic congestion is not increased as there will be no attraction for staff/students to drive to the site.</p> <p>The University is unable to stop people from illegally parking. The potential for illegal parking is reduced through the provision of off-site parking strategies, such as park n rides, which will accommodate demand outside of the Newcastle CBD. This will minimise the need and desire of people to travel into the Newcastle CBD in a private motor vehicle.</p>
<b>Risk Assessment</b>	<p>The Security Risk Assessment Report is inadequate as it only considers the security risks to the NeW Space building, no consideration has been given to the risks associated with the use of the enlarged car park in Laman Street and the personal safety of the significant number of students and staff expected to walk to and from the campus.</p> <p>No explanation is provided why a draft version of the report dated 17 April, 2014 has been submitted.</p> <p>The discussion of the application of CPTED strategies to the design of the NeW Space building refers only to natural surveillance measures. There is no acknowledgement of Technical/mechanical surveillance and the proposed use of CCTV.</p> <p>Crime statistics for the entire Newcastle LGA are used to assess security risk. It is considered that an assessment of the crime statistics specifically for the suburb of Newcastle (including the existing University House) and those areas included in the nominated Active Transport Zone would result in a more accurate identification of the most prevalent crimes and likely security risks to both the operation of NeW Space building and the Laman Street car park, as well as to the personal safety of staff and students expected to walk to and from the campus.</p>	<p>The Risk Assessment has undertaken a review of the existing environment and performed an analysis of the impact of the new development on safety and security, including personal safety risks associated with users of the proposed NeW Space development. The Risk Assessment has focused on the most important elements of the proposal as required by the SEARs.</p> <p>This report is final, with an error of a 'draft' mark included throughout the document.</p> <p>There is no requirement to provide CCTV for the proposed development. One of the most important objectives is to design the proposed building in a way which maximises natural surveillance, therefore minimising the need for technology such as CCTV. If deemed necessary at a later date, CCTV will be provided within the development.</p> <p>The crime statistics utilised in the Risk Assessment are valid and appropriate, in keeping with the common practice of using LGA wide statistics in risk assessments for new developments. The detailed information requested to be considered by Council is not readily available, and therefore such an assessment could not be undertaken. The personal safety of staff and students has been considered in the Risk Assessment.</p>
<b>Local Planning Instruments and Controls.</b>	<p>The car park between Gibson and Laman Streets is zoned R3 Medium Density Residential and is permissible in the zone. It is not considered to be consistent with the zone aims and objectives. The upgrading of the car park entrenches the non-residential land use of the site and does not meet the strategic direction of the Newcastle LEP 2012 for this location.</p> <p>Appendix J of the EIS contains a variation request pursuant to clause 4.6 of the Newcastle LEP 2012 seeking to justify a contravention of the maximum building height of 49.1 m permitted on the New Space site. The request incorrectly indicates that the request has been made in support of a development application submitted to Council.</p> <p>The EIS has not considered relevant sections of the DCP including the following:</p> <ul style="list-style-type: none"> <li>- Section 5.07 -Heritage Conservation Areas</li> <li>- Section 7.03- Traffic, Parking and Access</li> </ul>	<p>The proposed car parking use is consistent with the relevant objectives of the zone as it:</p> <ul style="list-style-type: none"> <li>▪ constitutes a land use that provide car parking facilities to meet the day to day needs of residents from the Newcastle LGA and surrounds; and</li> <li>▪ contributes to the diversity of activities in the locality.</li> </ul> <p>Noted. The Clause 4.6 Variation Request is no longer sought as the proposal has been redesigned to be within the maximum height limit of the Newcastle LEP 2012.</p> <p>The relevant provisions of the Newcastle DCP 2012 are addressed where required. As noted by Council, the Newcastle DCP 2012 does not apply to the project as it is deemed to be State Significant Development.</p>

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Public domain works	The proposed treatment of the footpath and street furniture location and type for Auckland and Hunter Streets is required to be consistent with the requirements of Council's City Centre Technical Manual (CCTM).	Noted.
	Prior to submitting any application under the Roads Act 1993 for construction within the road verge, the applicant is to consult with Council's City Centre Team.	Noted.
	The following matters are also required to be addressed: Street trees are to be selected from the CCTM.	Noted.
	'GARAKK' or aboriginal words used within paving for the development are to be confined within the subject site and are not to extend onto Council land. Etching in the footpath is not permitted in this location.	Noted.
	The required width of the footpath construction in Hunter Street is yet to be determined, as the final design details of the light rail have not been released. It is known that the maximum width of the footpath in Hunter Street will be 6m. The applicant is to consult with the City Centre Team for confirmation of the requirements of the CCTM prior to the lodgement of any application that involves the reconstruction of the footpath in Hunter Street.	Noted.
	The development is to install a minimum of 2 street trees along the Auckland Street frontage of the subject site.	Noted.
	The applicant is required to repave King and Auckland Street to the treatment detail of the CCTM as part of the renewal of Nesca House.	The application seeks approval for the repaving of the Hunter street frontage and a portion of the Auckland Street frontage in front of the proposed NeW Space building. As no works are proposed to the footpath in front NESCA House, it is not appropriate or necessary that these frontages be repaved.
	There is an inconsistency in the submitted documentation concerning the streetscape treatment proposed on Hunter and Auckland Streets. The diagram titled 'Public Domain Interface Option 8' of the submitted Landscape Architecture Schematic Design Report shows several trees in the public domain along the Hunter and Auckland Street frontage of the NeW Space site, which are not indicated on the Landscape Master Plan 04.	Approval is sought for the proposed landscaping scheme illustrated in the Landscape Master Plan.
	The above diagram indicates a tree close proximity to the traffic lights on north east corner of the intersection of Hunter and Auckland Streets. This tree is to be removed or relocated.	Approval is sought for the proposed landscaping scheme illustrated in the Landscape Master Plan, which does not involve the tree referred to in this comment.
The above diagram also shows the footpath in Auckland Street as being increased to 6 metres in width. This extension of the footpath is not supported and the existing width is to be retained and the proposed street trees relocated accordingly.	Noted. The proposed design seeks to maintain the current curb alignment.	
Development on Council owned land	The proposal includes development of a rectangular shaped parcel of Council owned land located between Christie Place and the NeW Space site. This land which is known as part of Lot 1 DP 225689 is not identified on the application form and in the EIS as part of the development site.	Minor landscaping works are proposed on a portion of Council land to allow for an appropriate transition from the NeW Space development to Christie Place. Consultation with Council Officers on these works has been undertaken to date and it is acknowledged that land owners consent will be required prior to the determination of the application.
	It is recommended that prior to determination of the application, the applicant is required to provide details of how the matters discussed with Council officers have been addressed in the development including the following : - Heavy vehicle access to the loading bays of the Civic Theatre and City Hall. The existing car park in Christie Place is used by large semi-trailers as a manoeuvring area.	This heavy vehicle access will not be affected by the proposed development. Where the existing car park is located there will be hardstand area which will remain suitable for vehicle turning movements.

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	<ul style="list-style-type: none"> <li>- Potential conflict between students using the Christie Place improvements and above vehicles.</li> </ul>	Removable bollards will be provided to minimise potential conflicts between pedestrians and vehicles.
	<ul style="list-style-type: none"> <li>- Relocation of the existing waste bin storage facility.</li> </ul>	Ongoing discussions have been conducted with Council and a number of potential options for relocating the waste bin storage facility have been identified. These options will continue to be refined in consultation with Council.
	<ul style="list-style-type: none"> <li>- Relocation of the existing disabled person parking space.</li> </ul>	Consultation will be ongoing with Council regarding the most suitable location for a disabled car parking space.
	<ul style="list-style-type: none"> <li>- Impact on water table issues associated with Civic Theatre.</li> </ul>	The proposal does not involve any significant excavations, with only minor footings and lift pits proposed to facilitate the NeW Space building. As such, it is unlikely there will be any impact on the water table.
	<ul style="list-style-type: none"> <li>- Potential noise impacts during the construction phase on the operations of the Civic Theatre and City Hall.</li> </ul>	An amended Noise and Vibration Assessment is provided at <b>Appendix E</b> of the Response to Submissions Report. This Assessment provides details of noise mitigation during the construction period of the proposed NeW Space development.
<b>Heritage</b>	<p>The EIS does not include a strategy for remedial repair of sandstone claddings or any other original fabric of NESCO House that may need conservation treatment, although the SoHI does refer to the poor state of the façade.</p> <p>A condition of consent should be applied requiring the applicant to prepare a Conservation Management Plan to guide the preservation of the building, including a strategy and time frame for remedial façade repair based on current best practice.</p>	These works are not currently proposed and would be the subject of a further application in the future. There is no identified immediate need to undertake façade upgrade works, and therefore the proposed works only relate to internal fitout works and minor external upgrades where necessary.
	<p>In its original use, the NESCA House building featured its name and crest in prominent letters attached to the face of the building. The items were removed some years ago. While this was necessary to demarcate the current use, removing the crest and name plate had a moderate negative impact and reduced the capacity to understand the history and original use. It is now timely that this issue is addressed in the form of an overall interpretation strategy, as a condition of consent to this application.</p>	The removal of the name and crest from the NESCA Building has been completed in the past and is therefore not relevant to the current application. A range of different factors will contribute to the future Heritage Interpretation Strategy. The final content of the Heritage Interpretation Strategy will be investigated at a later stage of the development process.
	<p>Both the 'make good' works and the removal of the existing fit-out should be supervised by an appropriately qualified heritage architect. In addition, an appropriately qualified heritage architect should be engaged to undertake the detailed design for the proposed fit-out, which would be integrated with the interpretation strategy and the conservation management plan.</p>	Suitable mitigation measures have been recommended by EJE Heritage and included in Section 5.0 of the Response to Submissions Report.
	<p>The SoHI does not specifically deal with the effect of proposed development on the heritage significance of Christie Place.</p>	The Statement of Heritage Impact (SoHI) for the NeW Space building addresses the heritage qualities of Christie Place and provides an overview of how the proposed development will interact with this space. This is addressed in Section 6.0 of the SoHI.
	<p>The key concern is the interface of the proposed car park opening with the historic residential buildings in Laman Street and the introduction of a new driveway crossover and how this impacts on the streetscape. The landscaping noted in the plans and elevations on Dwg DA-500 Rev 2 is vague and not sufficient as a means of mitigating the heritage impacts arising from the proposal.</p>	A SoHI for the Laman Street Car Park was submitted with the exhibited Environmental Impact Statement and concluded that the proposed car park would not have any adverse impacts on the heritage qualities of the precinct. The level of details in the submitted documentation is commensurate to the stage in the development process.
<b>Flooding and</b>	<p>It is recommended that measures should be taken to use flood resistant materials and finishes within the proposed building, and raised electrical power points and appliances, and have stored items above 3.3m AHD.</p>	Noted. This is consistent with the proposed mitigation measures.

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Stormwater Management		
Noise and Vibration	The Noise and Vibration Assessment provides no analysis of potential impacts from the proposed building or car park area. No assessment of potential traffic noise impacts or impacts of traffic noise on the proposed development have been provided in the assessment. It is recommended further analysis of potential acoustic impacts from the proposed development be incorporated into the Noise and Vibration Assessment.	An amended Noise and Vibration Assessment prepared by AECOM is provided at <b>Appendix E</b> of the Response to Submissions Report. This Assessment provides further analysis of potential acoustic impacts from the proposed development.
Impact on tree	The EIS is not supported by a report prepared an Arborist which assesses the likely impact of the Laman Street car park works on the tree located in the rear yard of 15 Charles Street, Cooks Hill.	An Arborist Report has been prepared and is provided at <b>Appendix F</b> of the Response to Submissions Report.
Statement of Heritage Impact (SoHI)	The Statement of Heritage Impact (SoHI) makes no assessment of the proposal against the endorsed NESCA house CMP and its conservation policies. Without this assessment, OEH cannot provide detailed comments on the impacts of the proposal on the building fabric of NESCA house or the impacts on the setting of NESCA house.	An amended SoHI is provided at <b>Appendix D</b> of the Response to Submissions Report addressing the CMP for NESCA House.
	The CMP prepared by the Government Architect's Office dated 2006 should be reviewed.	An amended SoHI is provided at <b>Appendix D</b> of the Response to Submissions Report addressing the CMP prepared by the Government Architect's Office.
	The SoHI should be modified to address any relevant CMPs and assess the levels of significance for all elements of the building that will be affected.	An amended SoHI is provided at <b>Appendix D</b> of the Response to Submissions Report addressing the relevant CMPs.
	OEH can provide recommended conditions for works to NESCA house following review of the amended SoHI.	Noted.
Conservation works to NESCA house	OEH recommends that a fabric survey is undertaken and schedule of conservation works be developed and undertaken as part of the development.	A Heritage Fabric Survey and Schedule of Conservation Works has been prepared by EJE Heritage (refer to <b>Appendix D</b> of the Response to Submissions Report).
Heritage Interpretation	The SoHI did not include any discussion of opportunities for heritage interpretation of NESCA house or the significant archaeology on adjacent development site. Whilst conservation and continued use of the building is the best form of interpretation, OEH recommends that the SoHI be amended to include a discussion on potential opportunities for heritage interpretation.	A Heritage Interpretation Strategy may be prepared at a later stage of the project. This could include opportunities for heritage interpretation of NESCA house or the significant archaeology on the site.
Newcastle City Hall and Civic Theatre	Consideration should therefore be given to enhancing the spaces between the new development and the adjacent NESCA house, Civic Theatre and Christie Park.	The space between these two buildings is being celebrated where it is located within the boundaries of the site. The proposed landscaped open space around the NeW Space building is inviting and integrates well with the existing and future development within the Civic Precinct. Areas beyond the boundary of the site will be subject to work by others.
	The treatment of the rear of the new building, particularly at ground level, should be complementary to NESCA house in regards to materials, colours and finishes. Any landscaping elements should also be sympathetic with the character of NESCA house and the adjoining Civic Theatre.	Noted. The treatment at the lower levels is sympathetic to NESCA House and the landscaping is complementary to the heritage listed buildings in the vicinity of the site.
Non-aboriginal Archaeology	OEH recommends a number of conditions to be included on the approval.	The proposed mitigation measures include measures related to Non-aboriginal Archaeology.

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<b>Roads and Maritime Services</b>		
<b>Critical assumptions</b>	Parking utilisation rates quoted are from 2008. These figures may no longer be relevant or accurate due to the considerable time frame that has lapsed, and no consideration has been given to the impact on parking spaces post implementation of the light rail project.	The data used is the most up-to-date publicly available information.
	Roads and Maritime cannot concur with the overarching statement that "Newcastle has a well-established and extensive transport system" without supporting evidence. The Hunter Region Transport Plan 2014 states that there are limited public transport options outside of higher density settlements, and the Newcastle Council Transport Working Paper 2014 states that the Newcastle LGA has a Public Transport Accessibility rating of very poor outside of the Newcastle City Centre or Active Transport Zone (ATZ).	Newcastle, in the context of this statement, refers to the city centre, where the proposed development will be located. The array of public transport services providing access to the NeW Space site are outlined in the updated transport documentation.
	An ATZ of 8km is not considered appropriate. A distance of 5km should be adopted in accordance with the Walking, Riding and Access to Public Transport Ministerial Statement prepared by the Department of Infrastructure and Transport in July 2013.	A justification of the 8km ATZ is provided with the updated transport documentation at <b>Appendix C</b> of the Response to Submissions Report.
	No viable justification has been provided to support the critical assumption that 66% of future students and staff attending NeW Space would reside within the ATZ, or that 54% of students will live within a 2km radius of the project. Roads and Maritime consider this assumption to be overly simplistic and misleading, as a critical assessment of other factors such as housing affordability, rental availability and income potentials has not been included as part of this strategy.	A justification and explanation of these assumptions is provided with the updated transport documentation at <b>Appendix C</b> of the Response to Submissions Report.
	A mode target rate of 0% cars for both future staff and students is not considered realistic or feasible. 91 % of journeys to work in the Hunter are currently made by car (either as a driver or passenger), and NSW 2021 has a target of increasing commuter trips by public transport to 20% by 2016. The Household Travel Survey 2010/2011 shows the Newcastle LGA as having the lowest rates of public transport usage and walking rates when compared to both Sydney and Illawarra.	This assumption has been revised and an updated analysis is provided with the Travel Demand and Parking Analysis prepared by SECA at <b>Appendix C</b> .
	The assumption of 36% of trips being made by public transport, when considering the above point, seems to be overly optimistic and without further justification and evidence is not supported.	A justification and explanation of all assumptions is provided with the updated transport documentation at <b>Appendix C</b> of the Response to Submissions Report.
	The Benchmarking case study on page 6 is once again overly simplistic and misleading. For the NeW space project to be compared to other major tertiary developments, all relevant factors such as the type and quality of existing public transport options, cost of living, housing affordability and availability, current availability and cost of other parking options all need to be fully considered.	A justification and explanation of all assumptions is provided with the updated transport documentation at <b>Appendix C</b> of the Response to Submissions Report.
	There is no justification or support, in the context of Newcastle and the Hunter, that car sharing will be utilised in the near future, and so should not be a consideration in the preparation of this transport strategy.	A car share strategy is not proposed with the project, but rather the reference to such a strategy is an acknowledgment that such programs may work and contribute to minimising independent car ownership and use.
	The Traffic Access Strategy should consider the potential traffic impacts on existing and proposed intersections and the capacity of the local and classified road network to safely and efficiently cater for the additional vehicular traffic generated by the proposed development. The study shall also give consideration to the impact of traffic generation on existing parking availability and policies within the area.	An updated Travel Demand and Parking Analysis and associated transport documentation has been prepared by SECA to address the parking demand and detail ways to mitigate any adverse traffic impacts. A variety of strategies are proposed to deter staff and students from travelling to the NeW Space campus by private motor vehicle, ensuring that no adverse traffic impacts will occur and no further assessment is required.