

29 September 2014

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Director, Industry, Key Sites & Social Projects
Department of Planning & Environment
PO Box 39
SYDNEY NSW 2001

Attention: Ms Megan Fu

**DONALD STREET (MR82): NEW SPACE PROJECT, UNIVERSITY OF NEWCASTLE, 409
HUNTER STREET & 300 KING STREET, NEWCASTLE (SSD6457)**

Dear Ms Fu,

I refer to your letter dated 18 August 2014 (your reference: SSD6457) regarding the Notice of Exhibition of the University of Newcastle's New Space Project, forwarded to Roads and Maritime Services for consideration. I apologise for the delay in responding.

Transport for NSW and Roads and Maritime's primary interests are in the road network, traffic and broader transport issues. In particular, the efficiency and safety of the classified road network, the security of property assets and the integration of land use and transport.

Roads and Maritime has reviewed the Transport Access Study prepared by Seca Solutions, dated July 2014, and considers an appropriate assessment of road and traffic issues has not been undertaken. The critical assumptions which underpin the study, and the subjective information contained within the study, as outlined below, are currently not supported:

- 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.
- 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).

- 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.
- 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 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.
- 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.
- 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.
- 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.

In line with current transport trends, projected transport trends and documented evidence, Roads and Maritime considers a significant number of both staff and students will travel to the NeW Space via car, and park in and around the city. On this basis, this 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.

For Roads and Maritime to accept the Traffic Access Study, further analysis and a critical evidence based review of assumptions is to be undertaken with regard to the points as previously outlined

On receipt of a revised Traffic Access Study, Roads and Maritime will provide further comment. Should you require further advice please contact me on (02) 4924 0688.

Yours sincerely,



Kellee McGilvray
A/Manager, Land Use
Hunter Region

Cc General Manager
Newcastle City Council