

28 February 2025

Transport for NSW  
Locked Bag 2300  
Newcastle NSW 2302

By email: [engage.sritps@transport.nsw.gov.au](mailto:engage.sritps@transport.nsw.gov.au)

Dear Sir or Madam,

**Re: Draft Hunter Strategic Regional Integrated Transport Plan (SRITP)**

The Urban Development Institute of Australia NSW (UDIA) is the peak industry body representing the leading participants in urban development across NSW through our over 450 member organisations. UDIA's members are developers, consultants, councils and state agencies. Our Hunter Chapter consults regularly with Transport for NSW (TfNSW) on local development issues and transport planning matters pertinent to the region. Together with our members, we shape the places where people will live for generations to come and in doing so, we are city shapers.

UDIA appreciates the opportunity to provide feedback on the draft Hunter Strategic Regional Integrated Transport Plan (draft SRITP or Plan), and we welcome further engagement prior to the finalisation and implementation of the Plan.

UDIA previously submitted recommendations to TfNSW in November 2022 regarding the draft Hunter Regional Transport Plan 2041 (H RTP); that plan was not finalised. Our recommendations at that time aimed to ensure the transport network aligns with the Department of Planning, Housing & Infrastructure's (DPHI) growth projections and policies to facilitate efficient and sustainable development in the region. We understand the current draft SRITP on exhibition aims to incorporate feedback from the draft H RTP consultation.

It is clear within the draft SRITP that tremendous effort has been applied to understanding and describing the current transport network in the Hunter Region and we highly commend that work. However, we consider that within the draft SRITP, future planning of the region's transport network remains inadequate to support the Hunter's growth.

We appreciate TfNSW's considerable time and attempts at industry consultation including our involvement in stakeholder workshops and TfNSW personnel actively engaging in UDIA forums. Unfortunately, we feel that our recommendations have not been effectively incorporated in this revised draft Plan.

To provide clear and consistent feedback on key transport matters that have been repeatedly presented to us by our membership, this submission evaluates the draft SRITP

against the nine key recommendations from our prior submission and offers our updated positions.

## **1. Growth Planning and Strategic Alignment**

**Previous Recommendation:** Correct the fundamental error in growth planning by adopting the current DPHI growth projections.

**Assessment of Draft SRITP:** The draft SRITP has adopted the TZP22, Population, Housing and Dwelling Dataset, Census 2021 Data, ERP (ABS2021) and NSW Population Projections – NSW Planning and Environment (p.7). However, there is no discernible link between the population forecast in the draft SRITP and the forecasts in DPHI's Hunter Regional Plan 2041 (HRP).

On this basis, the draft SRITP does not adequately integrate DPHI's latest growth projections, particularly for high-growth local government areas (LGA) like Maitland, Port Stephens, and Lake Macquarie. This failure risks underestimating transport demand and misaligning infrastructure planning with real regional population growth.

**UDIA Position:** TfNSW must adopt DPHI's most recent population forecasts to ensure infrastructure planning accurately supports anticipated growth. Our 2022 submission included a request for the TfNSW H RTP to be aligned to, and released with, DPHI's Hunter Regional Plan. The interceding time in which the H RTP has been renamed and redrafted results in the draft SRITP likely being released as an updated Regional Plan is being contemplated. The two documents are now wildly out of step, and we maintain our firm position that the two documents are interdependent and should be firmly linked.

## **2. New Studies for Key Transport Connections**

**Previous Recommendation:** Identify and conduct corridor studies for key TfNSW roads aligned with priority growth areas.

**Assessment of Draft SRITP:** We are encouraged by statements in the draft SRITP about "support[ing] sustainable growth and housing" and "work[ing] hand in glove with the Department of Planning, Housing and Infrastructure to deliver more homes for more Hunter families and the future land uses in the Hunter Regional Plan 2041." We are also encouraged by statements that TfNSW seeks to show "[e]arly provision of public transport and improvement to road network infrastructure that increases transport access to housing and employment land in regionally significant growth areas."

Unfortunately, we are unable to find tangible evidence in the draft SRITP about how this will be accomplished specifically. Overall, the draft SRITP has not provided sufficient detail as to how the transport needs of each of the HRP's growth areas will be studied and addressed.

We commend the inclusion of some “draft initiatives” related to current infrastructure projects that are needed to support growth such as around Main Road Cessnock, Newcastle Link Rd and New England Highway, as well as mention of investigations to improve bus servicing and consider rail links. These are important initiatives as far as they go. However, the current initiatives neither address the comprehensive needs across those areas, nor do they fully cover the Regional Plan’s other growth areas.

The draft Plan lacks specific commitment to planning and delivery of critical and related road corridor studies and integrated transport solutions across each growth area identified in the Regional Plan. Some notable comprehensive planning commitments missing from the draft Plan include Newcastle Link Road, John Renshaw Drive, New England Highway, MR217 (Main Road – Dora Street – Toronto Road), Main Road at Glendale, Morisset town centre bypass and the Anvil Creek rail overpass. These are examples of areas where critical work is needed to enable the delivery of thousands of new dwellings or jobs identified in the Regional Plan.

**UDIA Position:** TfNSW must urgently complete road corridor and integrated planning studies and define required upgrades to ensure infrastructure supports all growth areas identified in the HRP. This should include road corridor studies as well as the integration of adequate Public Transport such as buses and rail opportunities. There are available funds levied under the previous Hunter Special Infrastructure Contribution to support the completion of this work. The completed studies would define infrastructure need, apportionment of cost and funding mechanisms to enable informed decision-making for delivery.

### **3. Existing Corridor Study Obligations and Timelines**

**Previous Recommendation:** Clearly define obligations and timeframes for existing corridor studies that have been funded.

**Assessment of Draft SRITP:** The draft SRITP provides broad transport directions but lacks a clear timeline for implementing critical studies and infrastructure projects. As mentioned above, key studies are urgently needed to support growth areas. This includes transparency for existing corridor studies that were previously funded from State VPA (former SIC) funds, plus additional studies still required for the region’s growth.

**UDIA Position:** A detailed implementation schedule must be included in the final Plan, specifying project timelines, responsible agencies, and funding sources for the existing and future studies to support all growth areas identified in the HRP. The lack of completion or transparency on existing studies within the TfNSW system does not pay proper respect to the source of their funding from state development contributions and does little to promote confidence in any future contribution framework.

#### **4. Enhancing the Hunter Expressway's Role in Freight and Development**

**Previous Recommendation:** Shift from a "protection" strategy to leveraging the Hunter Expressway (HEX) for regional economic development.

**Assessment of Draft SRITP:** The draft SRITP continues the position of protecting the HEX rather than actively integrating it into a strategic freight and development framework.

**UDIA Position:** The final Plan should provide clear strategies for HEX interchanges to accommodate employment and logistics hubs.

#### **5. Collaborative Approach to Growth and Development Impacts**

**Previous Recommendation:** Co-design a modern framework for assessing development traffic impacts with the private sector.

**Assessment of Draft SRITP:** We are encouraged by the release of the updated Guide to Traffic Generating Development (Guide) which goes some way toward providing a modern, fit-for-purpose method of assessing transport impact of new development. We appreciate the effort and consultation on the new Guide.

**UDIA Position:** We note the draft SRITP contains alarming statistics showing significant under-use of public transport in the Hunter. A robust and valuable plan for the transport future of the Hunter Region should focus more comprehensively on correcting these numbers, improving the utilisation of Public Transport and reducing car dependence. TfNSW should work with the development industry on ways to support this shift given the complexity and dispersed nature of the region's many growth fronts.

#### **6. Development of a Lower Hunter Light Rail Masterplan**

**Previous Recommendation:** Commit to a long-term masterplan for light rail in the Lower Hunter.

**Assessment of Draft SRITP:** There is no strategic vision for expanding light rail in key urban centres. Currently, the draft SRITP endeavours only to 'preserve the transit corridor between Newcastle Interchange and Broadmeadow'. Given the scale, significance and NSW Government support of the Broadmeadow Precinct, only committing to protect the corridor lacks the ambition needed for a 20-year transport plan and disregards the potential for light rail beyond that specific corridor.

**UDIA Position:** Planning for the next stage of light rail, with a particular focus on an extension to Broadmeadow should be included in the Plan.

## 7. Reclassification of Critical Roads to Enable Growth

**Previous Recommendation:** Reclassify key regional roads to support urban expansion and employment precincts.

**Assessment of Draft SRITP:** No commitment is made to review road classifications to facilitate urban expansion.

**UDIA Position:** TfNSW should undertake a road classification review, prioritising growth precincts.

## 8. Infrastructure–First, Place–Based Delivery Framework

**Previous Recommendation:** Adopt an infrastructure–first approach and define capital funding processes.

**Assessment of Draft SRITP:** The plan does not establish a clear process for prioritising and funding critical transport projects. As stated in 2 above, the draft SRITP should commit to studies where the infrastructure can be defined, and cost apportioned.

**UDIA Position:** TfNSW should incorporate an explicit, transparent framework for aligning transport infrastructure delivery with regional planning priorities through commitment to corridor and other necessary studies, and it should outline the process for funding mechanisms and decisions that will provide confidence for infrastructure delivery aligned with the needs of growing communities.

## 9. Further Industry Consultation Before Finalisation

**Previous Recommendation:** Conduct additional industry workshops before finalising the plan.

**Assessment of Draft SRITP Process:** There have been welcome engagement opportunities throughout the draft SRITP drafting process. We are grateful for those sessions, and we believe our views have been valued. However, as described herein, we are disappointed that while some of our core messages are visible in high level statements, our corresponding recommendations have not been fully incorporated in this new draft.

## Conclusion

UDIA acknowledges and appreciates the effort in preparing the draft SRITP but maintains that the Plan falls short in addressing the critical transport infrastructure required to support the Hunter's forecast population and economic growth in coming decades. The draft SRITP must be revised to ensure it aligns with DPHI's planning frameworks and provides clear

infrastructure and/or planning commitments for the identified growth areas, underpinned by meaningful industry engagement.

UDIA welcomes further discussions with TfNSW to ensure the Hunter Region's transport network supports sustainable and strategic growth. Please contact Policy and Regional Manager Elizabeth York at [eyork@udiansw.com.au](mailto:eyork@udiansw.com.au) with any questions or follow up.

Kind regards,

A handwritten signature in black ink, appearing to read 'Stuart Ayres', with a stylized flourish at the end.

**Hon. Stuart Ayres**  
**Chief Executive Officer**