



NSW & ACT

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NSW Road Review Team  
Transport for NSW

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

Dear NSW Road Review Team,

#### **APPROACH TO ROAD RECATEGORISATION**

I write with reference to the Review of the *Approach to Road Recategorisation process* and the subsequent call for initial feedback from interested parties.

As you are aware, the Institute of Public Works Engineering Australasia (NSW & ACT) ("the Institute"), has a long history of engaging with government on matters relating to roads and transport, noting that the Institute represents a significant number of public works professionals who are responsible for the local government road network and transport sectors.

Following the correspondence received on Friday 20<sup>th</sup> December 2024 regarding the introduction of a refreshed approach to Road Recategorisation, please see the Institute's feedback on the draft Guidance Notes enclosed.

If you have any further questions regarding the feedback provided, please do not hesitate to contact the Institute. We would welcome any opportunity to discuss our recommendations in more detail in person.

Yours sincerely,

The Hon David Elliott  
Chief Executive Officer  
IPWEA NSW and ACT

Mr Joshua Devitt  
Chief Engineer  
IPWEA NSW and ACT

## General Commentary

- There is an overall lack of detail in the draft guidance notes. Details on key parts of the process are not provided (e.g. financial settlement details, strategic merit test, interactive portal), making it difficult to provide a comprehensive assessment of the value of the process.
- There is a lack of clarity as to whether certain processes apply to the transfer of roads from councils to Transport for NSW, or from Transport for NSW to councils, or both. This undermines the commitment of the process to being applied consistently.
- The overriding determination for approvals under this process exclusively favours Transport for NSW. All of the decision-making power is vested in senior transport staff and the NSW transport minister. In order to truly reflect a collaborative process, consideration should be given to greater ownership of the process by local councils. This could be via councils having a 'right of refusal' to accept former state government assets, or input to determinations from the Minister for Local Government and the OLG. Alternatively, a review panel with representatives from local government, Transport for NSW and independent experts could be established to assess and recommend proposals to the Minister. IPWEA NSW & ACT would be prepared to sit on such a panel were it to be established.
- Clarification is sought as to whether this process is creating or replacing a layer of road classifications. The NSW state government previously required NSW councils to create and maintain a 'road hierarchy' which is inconsistent with those outlined in the 'Definitions and Criteria'. Consideration should be given to streamlining definitions at a state level, or aligning with Federal definitions to reduce the administrative burden on NSW councils.
- On a related note, the draft process seems to imply that councils must comply with all TfNSW Asset management definitions and terminology. This would be in addition to councils' current obligations to the definitions and terminology in local Asset Management Plans, the IPWEA IIMM and ISO 55000, as well as requirements from the Office of Local Government and NSW Audit Office. Streamlining and clarification would again be preferable to reduce the administrative burden for councils.

## Guidance Note 1

**Section 1.1:** IPWEA NSW & ACT agrees with the position that councils are well placed to make an informed assessment on recategorisation of roads in their local area. However, it is worth noting the current resource constraints being faced by many councils and that support may be needed for councils (in particular; smaller, more remote councils) to facilitate the recategorisation process.

**Section 1.2:** When will details of the online portal being developed be made available? When will council road managers be able to review and provide commentary on this portal?

**Section 1.5.2:** Noting that road reclassification is not being addressed in this process. What are the potential implications of the ongoing review of the *NSW Roads Act* to the outcomes of this process?

**Figure 1:** Noting that this is a conceptual model, it is important to highlight that the distinction between mobility and access for state vs regional roads blurs significantly in the non-metropolitan areas of the state. Many regional roads play a critical mobility role in rural and remote areas, and many state roads play a critical access function in the same areas.

**Section 1.6:** Recommend moving the 'Planning scales and terminology' table from Guidance Note 1 to Guidance Note 2. This would keep the 'Planning scales and terminology' with the rest of the 'Definitions and criteria' in Guidance Note 2.

**Table 1:** It is important to define a 'segment' in the context of this document, as opposed to its asset management meaning, which is standard parlance across the NSW local government sector.

**Table 2:** Some of the documents outlined here are not directly referenced in any of the guidance notes.

## Guidance Note 2

**Table 1:** The definitions of Large and Moderate towns do not always reflect the criticality of these locations from a network perspective. For example, there are numerous towns smaller than 15,000 people which are strategically important for the support of nearby smaller settlements. Recommend expanding these definitions to include a functional element. E.g. Large town: 15,000 residents or serves as a primary service hub for surrounding smaller communities.

**Section 1.2:** Recommend combining the tables for points of interest definitions into a single table, perhaps grouping the parameters e.g.:

- a. Locations (Capital cities, Major cities, Large towns, Moderate towns, Local towns, Interstate Towns / Cities).
- b. Centres (Major centres, Moderate centres, Local centres).
- c. Key destinations (Tourist areas of state significance, Commercial buildings, Industrial buildings, Major hospitals, Regional hospitals, Major ports (sea), International airport, Regional airport).

**Table 2:** Recommend providing the definition of major intermodal terminal, as used in the criteria for Nationally Significant State Roads.

**Section 2.2:** Recommend providing greater clarification between:

- a. Remote and Regional Areas,
- b. Urban Areas,
- c. Rural Locations,
- d. Cities, and
- e. Centres

Particularly, the definition of 'State Roads Across Rural Locations': are non-urban roads typically within but not limited to, more urbanised areas such as the cities of the Lower Hunter and Greater Newcastle, Central Coast, Greater Sydney and Illawarra-Shoalhaven.

**Section 2.4:** Why are submissions for State Road Interfaces and Accessed being limited to Transport for NSW? There may be circumstances where other types of road manager have cause to raise such items for consideration. This would seem to run counter to the claimed approach of being 'transparent' and 'consistent'.

**Table 3 and Table 4:** Greater clarity on the vehicle volumes is required. Are these vehicle volumes based on AADT? Do they cater for roads subject to seasonal variation due to harvest activities etc.? The other challenge with vehicle volumes is the disparity between urban vs regional traffic flows that could result in no regional roads ever being recategorised. It is critical that these figures be validated

against traffic volumes on the existing road network. Feedback from our members indicates that the proposed figures are not reflective of current vehicle volumes, particularly on regional roads.

**Section 2.5:** Parallel state and regional links can be advantageous for network resilience, particularly in areas identified as high risk for natural disasters. This was shown clearly during the widespread flooding in 2022 / 2023 where portions of the regional and local road network were used as detours for the state road network. Consideration should be given to including network resilience during natural disasters (e.g. evacuation routes, key detours, access to critical infrastructure) in the criteria for assessment.

**Section 3.2:** IPWEA NSW & ACT are of the opinion that the speed limit of a road should be assessed on a case-by-case basis depending on the condition of the road environment. I.e. the right speed for the right road. Adjusting speed limits on the basis of proximity to a parallel state road runs counter to this position.

### Guidance Note 3

**Section 1.2:** The proposed process for roads that traverse multiple LGAs is much too cumbersome. A single submission from joint proponents for the same road would be much more streamlined.

**Section 2.2:** Noting that the Strategic Merit Test has been designed, why has it not been made available for consultation? The details in the SMT will be critical in understanding how the determination of economic viability will be defined and whether it will consider the benefit to the community as a whole, and not favour one level of government over another. Also, validation and several iterations of this process via sections of the current road network will be required to understand the overall scope of potential road recategorisation.

**Section 3.2:** Feasibility needs to move towards a proactive approach to road safety. Instead of what incidents have occurred, consider what incidents could be avoided through recategorisation. Additionally, the feasibility section should consider all natural disaster issues, not just floods.

**Section 4.2:** Community consultation on road recategorisation changes should be mandatory, particularly as any changes impacting the local road network require sign off from councillors (as per section 5.2) which operate based on a mandate from their communities.

**Section 5.2:** For proposals submitted by TfNSW, who is the determining authority on this matter? Is there a right of refusal from any impacted councils?

### Guidance Note 4

**Section 1.1:** Outlines the process for councils to propose roads for recategorisation, but does not provide an overview of proposals initiated by Transport for NSW. This raises concerns as to the 'consistency' and 'transparency' of the process.

**Table 1:** Items outlined under strategic importance don't appear to fully align to the criteria outlined in Guidance Note 2. This is also the first mention of 'level of service' in the guidance notes, which will be difficult to objectively assess as they are set by the asset management plans in each individual local government area and vary for each individual council.

**Section 3.1:** Financial settlements need to be reflective of the constrained funding environment in the local government sector, and not used as a mechanism for refusing recategorisation of local to

state assets. The process of handing assets over to councils from Transport for NSW should include greater input to the process from a council perspective, including the right of refusal.

**Section 3.1.1:** When will details of the financial arrangements be available for review. Difficult to make an informed decision about the process without these details.

**Section 3.3.2:** It is unclear why reclassification has been referenced in this section, as this has been identified as being specifically excluded from the recategorisation process.