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Sunshine Coast Mass Transit Project Team
Transport Planning and Operations
Sunshine Coast City Council
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RE: Have Your Say – Sunshine Coast Mass Transit

Dear Sunshine Coast Mass Transit project team,

RACQ thanks you for the opportunity to comment on the Sunshine Coast Mass Transit Project Draft Options Analysis. On behalf of our nearly 1.8 Million members, RACQ is the trusted voice advocating for a safe, affordable, and sustainable transport network.

Our policy and project priorities aim to:

- improve the safety of roads, vehicles, and travellers;
- ensure value for money with fair and justifiable transport costs; and
- support mobility now and for the future.

In reviewing the Draft Options Analysis, RACQ is generally supportive of the recommendation that there are four (4) identified transport options which merit further investigation and detailed analysis. The four defined transport options are:

- Light Rail Transit (LRT),
- Wireless Light Rail Transit (wLRT),
- Bus Rapid Transit (BRT), and
- Trackless Trams (TT)

However, it is noted that the Benefit Cost Ratio (BCR) is reliant upon value uplift and land use change to be successful and cost effective for the Sunshine Coast community. RACQ strongly encourages that the final Options Analysis contains more information regarding the future land use changes that will support the viability of this project. Providing more information about this element of the project will ensure greater transparency regarding the land use and transport outcomes of the Mass Transit project.

The land use change information that is presented appears to align with existing State and Local planning instruments and plans, however, more information in the Draft Options Analysis is required highlighting the potential changes from this project. This is an important component of the project because assumptions and calculations have been made based on land use – to inform the BCR, it should therefore be contained in greater detail within the Draft Options Analysis.

Further feedback providing general comments as well as responding to specific sections from the Draft Options Analysis are attached in the body of this submission.

Thank you again for the opportunity to provide comment on the continuing work being prepared for the Sunshine Coast Mass Transit Project. If you require further clarification on any of the points raised in this letter, you can contact myself or liaise with RACQ's Transport Planning and Infrastructure Advisor, Tim Mitchell, on [redacted] or [redacted]

[redacted]

ATTACHMENT – RESPONSE TO DRAFT OPTIONS ANALYSIS

GENERAL COMMENTS

- It's understood that there is a large suite of supporting documents that have been prepared over many years, however it may be prudent to use updated data/figures (where available), as data from 2016, and earlier, within the draft options analysis may be outdated in some instances. RACQ strongly recommends 2021 census data should be used during the Detailed Business Case stage of the project.
- There are comments within the document referring to design of treatments, such as pedestrian and cycling facilities. RACQ requests further details of these treatments be provided for assessment.
- At times it's difficult to understand the data sets in the Draft Options Analysis because it seems to swap between using data solely contained within the Strategic Urban Corridor as well as data for all Sunshine Coast (i.e., mode share, car ownership, etc.). As the Mass Transport Project is a proposed fixed system (i.e., not seeking to provide an improved transit connection to the whole region) some statistics may be disputed. It is appreciated that specific data within the Sunshine Coast Urban Corridor (SCUC) is limited and other available data is necessary to be used, but RACQ recommends localised data be collected and used where possible.
- RACQ strongly urges the project team to incorporate more information within the Options Analysis regarding the intended footprint and scope of land use change and subsequent value uplift.
- RACQ recommends that Department of Transport and Main Roads conduct a review of the whole bus network in conjunction with the mass transit project to allow the transformation of the existing bus network that will enable an effective, efficient, sustainable and affordable city-wide public transport network. Noting, that given the uncertain delivery timeframes, network reviews should also occur in the interim to support public transport uptake.
- RACQ recommends that future documentation updates all maps/figures to include both Kawana with Birtinya – noting that most references within the document and graphics seems to interchange the two.

TABLE: SPECIFIC COMMENTARY RESPONDING TO DRAFT OPTIONS ANALYSIS

Section	Comment
EXECUTIVE SUMMARY	
The challenge of sustainable population growth (page 16)	RACQ requests Figures 2 and 3 be created at the same scale to show the urban corridor in relation to the existing urban areas.
Options assessment: Table 2 – results of weighted scoring under the quantified MCA (page 25)	It is unclear in the draft options analysis how LRT scored significantly higher than BRT, being LRT 10 (highest score) and BRT 5.6. The Draft ATAP guidelines noted that the % percentage uplift to BRT and LRT were comparable (9.5% LRT & 9.7% BRT), however the weighting given to LRT (and wLRT) against BRT doesn't align with this reasoning. RACQ requests clarification in relation to the weighting applied to this scoring.
4. SUNSHINE COAST MASS TRANSIT	
4.3.2.2 Capital initiative options (page 58)	RACQ accepts that major road network upgrades will not change existing mode share but notes that the importance of the local road network cannot be underestimated, and holistic upgrades (such as separated cycling facilities and high-quality pedestrian facilities) need to be included in any upgrade projects.
Figure 22 – Geographic breakdown and focus areas for a SCMT solution from the Strategic Business Case (page 60)	The five Priority Areas identified are supported, however it is suggested that there may be benefit in increasing the priority of the Airport (currently Priority Area 5) due to Sunshine Coast Airport Expansion Project being completed in 2020. This is an important connection to the SUC, particularly noting that it is projected that more than half of the Sunshine Coast population (Roy Morgan Research, Sky high: Australians' air travel habits, December 2016) is expected to utilise air travel. Having a strong public transport connection servicing the airport would reduce private vehicle trips, service the expected increase in visitors/tourists and be of benefit to the surrounding communities. RACQ recommends including information regarding the amount of airport arrivals subsequently travelling to Noosa or to other locations outside of Sunshine Coast LGA.
6. SERVICE NEEDS AND BENEFITS	
6.3.5 Lack of dwelling choices (page 76)	RACQ suggests adding criteria for medium and high density (i.e., dwellings per hectare, etc.) to clearly define percentage of housing type.
6.6.2 Employment self-containment (page 87)	RACQ recommends displaying self-containment statistics graphically (i.e., pie chart, graph, etc.) rather than grammatically, this will make the section easier to follow.
6.6.5 Total amount of vehicle kilometres travelled (page 88)	It's understood that this section shows the forecasted increase in kilometres being travelled by a vehicle in 2041, however it's not clear if this is being attributed to current mode share – 85% private vehicle trips. It is suggested that this section is expanded to clearly execute the point bring discussed or alternatively, the data is expanded upon to breakdown

Section	Comment
	the forecasted data to show a breakdown in private vehicle trips, commercial/freight, public transport and ride share.
7. INVESTMENT STRATEGIES	
7.1.1 Staged delivery of the mass transit master plan (page 97)	Although located outside of Sunshine Coast LGA, it is important to acknowledge the necessary transit connections to Noosa. This connection is particularly relevant from the Sunshine Coast airport. Noting there is a reference to this connection in the Strategic Business Case (page 98).
7.2.8 Summary of overall findings (page 115)	Suggest including a map illustrating the summary of overall findings as these findings aren't shown graphically earlier in the document.
8. LAND USE ANALYSIS	
8.4.4 Methodology used in the urban change scenarios (page 121-122)	Figure 44 SCMT potential catchment area: there needs to be a clearer delineation of intended land use within the identified catchment area. It is a significant corridor that will have a mix of land uses, not solely just higher density residential. It needs to be clearer what the intentions are for this catchment. RACQ also requests clarification on whether the identified 10-min walkable catchment based on actual walkability or is it a measurement taken from an aerial distance. If it is the later, RACQ strongly recommends this be adjusted to actual walkability to ensure patronage estimates are feasible.
8.4.9.2 Building height and skyline character (page 128)	The broad land use statements appear acceptable but additional context is required in a visual format, such as a map or plan. This is important to understand the footprint and scope of higher density across the urban corridor. The qualifying statements are reasonable however it is difficult to support the findings without a visual representation.
8.4.5 Summary of land use analysis (page 131)	RACQ recommends that graphics, such as maps, are incorporated into this section to illustrate the land use analysis.
9. BASE CASE WITH NO INTERVENTION	
9.2.4 Base Case Public Transport Network (page 142)	Translink is legislated to, at least every four years, prepare and approve a written network plan about funded improvements in mass transit services and infrastructure for the TransLink area[1]. To further strengthen the public transport base case, RACQ recommends the project team liaise with Translink network planners to determine the likely investment across the bus network, based on the forecast growth. This consultation should inform a suite of bus network improvements that may be more comprehensive than what is currently outlined in tables 35 and 36. Table numbering 35 and 36 is duplicated (pages 139-140 and 142-143). RACQ recommends table numbering is corrected and document updated.

[1] Transport Operations (TransLink Transit Authority) Act 2008

Section	Comment
9.3.2 Increasing congestion (pages 149-150)	Clarification is required for Figure 54 & 55 AM & PM Peak VC Ratios as it is unclear if the 2041 forecasts include road upgrades outlined earlier in the document in tables 34 to 36.
9.3.3 Lack of realistic alternatives to car travel (page 151)	It is understood what this section is conveying, however the contents in Table 39 are unclear – it is recommended that this table is updated so that the data being presented is clear, or the preceding section is amended to support the contents of the table.
10. OPTIONS SHORTLISTING	
10.3.3.2 Will people use it? Attracting passengers out of cars (page 163)	Table 41 – attributes to attract and keep riders: RACQ recommends safety & amenity be included as key attributes to attract and maintain riders. Safety and the perception of safety is particularly important during off-peak and night-time patronage.
10.3.3.3 Transit system option capacities (page 165)	RACQ requests further clarification on how many vehicles per options can operate and fit within the SCMT. Table 43 outlines vehicle attributes and capacities, but there doesn't appear to be any analysis of the quantity of vehicles that are able to operate a service. Table 45 – MCA criteria: core assessment weighting - cost & risk (15%) and sustainability and liveability (10%). Sustainability and liveability are essential components to creating a resilient and liveable community, because the land use change component of this project is important to achieving a positive BCR, it is recommended that this is reflected in the weighting of MCA criteria. Table 48 – Land use scoring: 100% take up rate for both LRT options seems overconfident when comparing BRT to 75%. In relation to the summary above the table, the referenced ATAP draft guidelines noted that the main difference between BRT and LRT take up value comes down to design choices (i.e., stations, etc.) over the type of transit system. The divergence in scoring between the two can be viewed as being bias towards a particular option (i.e., subjective over objective). RACQ requests this be reviewed. Table 51 Quantitative MCA results and sensitivities – RACQ requests clarification as to why wLRT scores lower in the cost weighting than LRT. It is noted wLRT has an estimated lower capital and operational cost than LRT as well as wLRT having a lower visual amenity impact by being able to operate without overhead wires.
11. SHORTLISTED REFERENCE PROJECTS	
11.1.5 Scope of Reference Project – QBC (page 181)	Section 11.1.5.1 to 11.1.8 does not appear to be correct as it begins by referencing BRT but then goes on to discuss QBC. If this is intended, further clarification is needed in relation to the difference between the document sub-titles and text.
12. TRANSPORT OUTCOMES	
12.2.3 Category B Mass Transit Project Options (page 223)	RACQ notes the 1,000-space park n ride appears to be a proposed rather than existing facility. RACQ requests further evidence to support the viability and demand for this size, such as modelling to determine potential users of this park n ride.

Section	Comment
	Figure 73 – It is noted there are 3 interchanges, and 16 stops outlined earlier in document. RACQ requests clarification if the 3 interchanges are included in the 16 stops. It would be helpful if other stops were highlighted in this figure, noting all bus stop locations are identified in figure 76.
12.4 Summary of transport outcomes (page 240)	Figure 106 highlights the lowest levels of congestion AM Peak 2041. RACQ also recommends including a PM peak projection. Further clarification is also requested as to whether this figure assumes ultimate delivery of each project case, and whether other projects are included such as CAMCOS.
15. ECONOMIC APPRAISAL	
15.6.1 Core results Table 84 Results of Economic Appraisal (page 275)	The land use value change from zoning and density has been defined as $613M for the LRT/wLRT options. There doesn't appear to be much supporting data to outline how this amount has been calculated and it is suggested that more information is provided to understand the analysis and assumptions used.
15.7 Strategic land use outcomes (page 279)	It would be beneficial to provide visual cues, such as maps, to illustrate the differing land use outcomes between all referenced projects (i.e., LRT/wLRT, BRT, TT and QBC). Noting Figure 44 (page 122) is high level showing corridor footprint and priority section stages, it would be beneficial if this section of the document included the images shown in the Urban Form Fact Sheet. The identified potential areas for further exploration are generally supported – also the complementary investments across transport projects to improve network operating capability in the broader road network.
URBAN FORM FACT SHEET	The Urban Form fact sheet outlines three (3) scenarios and from an integrated land use and transport planning perspective it would appear the most appropriate scenario in terms of maximising value uplift is scenario 1. This is suggested because this scenario clearly defines key transit nodes which are subsequent complimented by are utilised to provide housing choice. Also, this option appears to reflect the current zoning in the Sunshine Coast Planning Scheme, albeit the higher density areas have a larger footprint. The key issue with Scenario 2 is that a linear developed higher density strip would not necessarily maximise the mass transit component as there will likely be higher density (higher than detached dwellings) developments not within easy walking distance to a station or key transit node. This option is likely to result in a more diverse housing outcome, which is a positive, and also place greater emphasis on placemaking and the active transport network across the SCUC. From a land use, placemaking and urban amenity perspective scenario 3 appears to illustrate an urban sprawl/lower density scenario which would

Section	Comment
	likely detract from the 'Sunshine Coast lifestyle amenity' and result in higher investment across the transport network to accommodate the dispersed growth.