



6 December 2023

Department of Infrastructure, Transport,  
Regional Development, Communications and the Arts  
Via web site and email:  
NRTTStrategyandCAVAActionPlan@infrastructure.gov.au

## **Submission to Draft National Road Transport Technology Strategy and 2024-27 National Connected and Automated Vehicle (CAV) Action Plan**

Thank you for the providing opportunity for Inner West Council to comment on the Draft National Road Transport Technology Strategy and 2024-27 National Connected and Automated Vehicle (CAV) Action Plan. Due to the timeframe for the review, this submission has been prepared at officer level and has not been formally adopted by Council. This submission includes Council's narrative in relation to the proposed Strategy and Action Plan. To aid in analysing the submission key points for consideration, they have been indicated in ***bold italics***.

Council commends the Department on preparing these two critical policy documents and provides the following comments for consideration.

***Overall, Council considers that local government should be more actively involved in the next stage of development of both the Strategy and Action Plan. Additionally, in relation to CAVs, Council considers it essential that emphasis be placed on use of electric CAVs as part of the shared economy rather than as part of the private vehicle fleet, and that the Action Plan should address the role of CAV public transport in a manner that encourages mode shift towards more public transport.***

### **Draft National Transport Technology Strategy**

#### **Vision and Objective**

Council supports the Strategy's vision for a *safer, more efficient, productive, sustainable and accessible transport system for all Australians, through deployment and uptake of new road transport technologies to enhance social, environmental and economic well-being*. Additionally, the objective of having a nationally consistent approach to technology deployment is considered essential.

#### **Role of governments**

In developing and assessing transport technologies it is considered essential that the role of local government is not ignored. Councils have the most direct interface with the Community and, as such, often need to be the most responsive as issues arise. Consequently, while Federal and State

Governments are responsible for policy leadership, regulatory stewardship and targeted investment, *it is considered that the Strategy neglects the role of local government in the following:*

- *the direct application and enforcement of the regulatory controls;*
- *coordination of public transport technological advances with active transport and first mile/last mile access;*
- *allocation and administration of kerbspace;*
- *application of new transport technologies to neighbourhood development and revitalization of centres, such as shopping strips and main streets.*

### **Principles guiding government action**

Council supports the policy principles outlined, particularly the need to improve transport outcomes and ensure safe secure operations.

To amplify the benefits of the proposed Policy Principles *it is requested that they should include increased emphasis on creating spaces for people. Consequently, investments should prioritise active and public transport initiatives (such as technologically enhanced cycling and walking, active transport wayfinding, trackless trams, and guided public transit systems), followed by infrastructure to aid the transport-disadvantaged (such as young/older people, people with disabilities which would prevent them from travelling with ease,). It is further considered that investment associated with private CAVs should be the last priority.*

*While the Strategy refers to the principle of "user-centric implementation", Council considers that the importance of access and inclusion may be diluted by this generic wording and requests that a separate principle of "inclusivity" be provided in the Strategy.*

### **Benefits and challenges of road transport technologies**

In addressing the benefits and challenges of road transport technologies **Council requests that:**

- *Consideration should be given to the impact that enhanced connectivity and real time information will have in potentially encouraging greater reliance on private cars. Consequently, Council suggests that complementary measures be implemented which ensure that public and active transport are prioritised ahead of private car use, to ensure that new technologies do not result in a mode shift away from more sustainable transport modes;*
- *The Strategy should place more emphasis on taking advantage of the many emerging technologies that will be available to enhance public transport and attract a mode shift towards public and active transport. This is considered particularly important in relation to sustainability, as while the Strategy mentions automated public transport rideshare and e-scooters it does not give sufficient recognition to the sustainability benefits achieved by significant mode shifts away from private cars;*
- *Technology should be deployed to assist in supporting a road user hierarchy which reflects the accepted Movement and Place Framework, and supports active and public transport ahead of a reliance on private vehicles.*

Council continues to support the use of technologies to ensure enhanced safety, equity and accessibility, as well as the exploration of opportunities to harmonise standards and systems

across borders. *Opportunities should also be explored with data management and access, to ensure that all agencies, including local government, can be provided with up-to-date evidence bases to inform their planning for both movement and land uses.*

*Council also calls for State and Federal Governments to ensure representation of local government and comprehensive consultation with local communities.*

#### **Draft 2024–27 National Connected and Automated Vehicle Action Plan**

Council commends the Department in taking the initiative to develop a national approach to CAVs. It is considered essential that these vehicles be dealt with in a seamless manner which is consistent across borders. *While the Action Plan clearly sets actions for the Commonwealth, States and Territories, concern is expressed that local government has not been directly involved in its development, and yet Local Government will be an essential mechanism in implementing many management initiatives (not the least of which are kerbside management and standards for new developments).*

*Further, it is considered that the Action Plan should be revised to place greater emphasis on the use of CAVs within the shared economy, rather than encouraging them as a key component of the private vehicle fleet.*

#### **Workstream 1: Vehicle Automation**

*Council requests that:*

- *Action 1.2 (inter-jurisdictional coordination and engagement) should include direct consultation and engagement with local government;*
- *Action 1.5 (monitoring progress) should include direct consultation and engagement with local government;*
- *Action 1.7 (develop educational materials) should include direct consultation and engagement with local government.*

#### **Workstream 2; Vehicle Connectivity**

Council recognises that the development of nationwide standards and approaches to CAV technology is essential and supports the proposed actions.

#### **Workstream 3; Cross-cutting actions supporting CAVS**

*Council requests that:*

- *Action 3.1 (development of an approach to look holistically at CAVs) should include direct consultation and engagement with local government;*
- *Action 3.2 (data sharing and management) should include direct consultation and engagement with local government;*
- *Action 3.3 (review readiness for commercial deployment of CAVs) should include direct consultation and engagement with local government;*
- *Action 3.5 (develop guidance on physical road infrastructure) should include direct consultation and engagement with local government;*

- *Action 3.10 (investigate MaaS) should include direct consultation and engagement with local government.*

#### **Other considerations**

*Council requests that the Action Plan place greater emphasis on the encouragement of CAVs to be part of the shared economy, rather than privately owned and deployed. It is considered essential to address the implications of high levels of private ownership of CAVs, which would have the potential to result in an even greater number of cars on the road as people who currently do not have licences (or do not intend to get them) could add to the total Australian fleet size by owning CAVs.*

*Such a scenario has the potential to result in negative impacts including:*

- *high levels of traffic congestion;*
- *increased carbon footprint – even if the vehicles are electric, they would contain embedded carbon penalties through their production, and later disposal;*
- *increase demand on the Australian power grid if the vehicles are electric, with increased pollution if they are not electric;*
- *creation of significant barriers to pedestrians and cyclists;*
- *potential impact of congestion on the efficiency of public transport;*
- *significantly increased demand for infrastructure, placing increased burden on the Australian economy.*

*Consequently, it is considered essential that the Action Plan include measures to discourage high levels of private ownership of CAVs working consistently with measures to encourage electric CAVs to be used within the shared economy (e.g. car share). Even if CAVs were only to occur within the shared economy care, should be taken in the management of circulating empty CAVs, cruising for patronage, as this would present its own congestion problems. Consequently, Councils would need to be involved in the development of CAV storage areas or hubs. These facilities may either be similar to public car parks or may be established within new developments.*

*Additionally, it is essential that the Action Plan address opportunities for CAV technology to facilitate more efficient public transport with larger scale CAVs deployed as medium or mass transit.*

Particularly in relation to the development of regulatory frameworks and deployment it is essential that local government is actively involved. In many cases local government will be the agency tasked with implementing and enforcing many aspects of this technology.

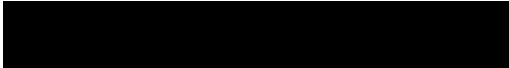
*Elements likely to be managed, to some extent by local government include:*

- *implementation and enforcement of kerbside controls;*
- *provision of areas for shared-CAVs (car share and ride share parking, as well as the development of areas for CAV hubs);*
- *Allocation of CAV space, or otherwise, in new developments through development control plans;*

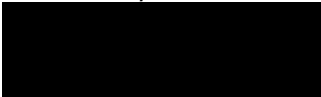
- *management of impacts of CAVs on the local street network.*

*In general Council, noting recent experience with electric vehicles, emphasises the need to ensure that the technology and infrastructure for CAVs is rolled out concurrently with, or ideally in advance of, demand.*

Thank you again for the opportunity for Inner West Council to comment on the Draft *National Road Transport Technology Strategy* and *2024-27 National Connected and Automated Vehicle (CAV) Action Plan*. Should you have any questions regarding this submission please contact Council's Coordinator of Strategic Transport Planning, Ken Welsh, via:



Sincerely,



Manod Wickramasinghe  
**Traffic and Transport Planning Manager**