

## NATIONAL URBAN POLICY: SUBMISSION

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**Type of submission:** Public

The Friends of the Earth's Sustainable Cities Collective welcomes the development of a new National Urban Policy (the Policy) and the opportunity to provide feedback on this.

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9	Other national priority areas that the Policy supports.	There is no mention of health here. A strong urban policy should also contribute to achieving health objectives, for example by reducing exposure to air pollution; encouraging physical activity; supporting social interaction; and providing safe environments.
17	Liveability	We suggest rephrasing "This is a safe...and connections within the community" to "This is a safe...and connections within the community and to the wider city."  Similarly, we suggest that connectivity not be limited to "community places and employment centres" but include all destinations that people need to access in their daily life. This includes, but is not limited to: education, employment, health services, friends, family, banks, supermarkets and recreation.
18	Sustainable	Given the contribution of the transport sector to greenhouse gas emissions, we believe that the transport sector should be mentioned explicitly here.
21	Obj 1: No-one and no place left behind	Although focussed on transport, the Sustainable Cities Collective acknowledges the importance of addressing the current housing crisis. However, we are concerned that simply calling for measures to increase housing supply will lead to a glut of poor quality housing. Poor quality housing can have a range of negative impacts for dwellers including heat/cold exposure, additional financial costs and stress. They are also likely to have

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		a greater environmental footprint. We recommend that the term “high-quality housing” (or similar) is used throughout the report to emphasise the importance of this.
21	Obj 2: All people belong and are welcome	We would like to see transport accessibility mentioned explicitly here. Certain groups will be restricted from actively participating in society if public transport routes, stops/stations, and modes are not made fully accessible.
21	Obj 5: Our urban environments and communities promote health and wellbeing	Healthy lifestyles are also supported by public transport networks. We suggest amending the first sentence as follows: “Urban areas must support healthy, active lifestyles through access to high quality green and blue spaces, housing, and active and public transport options.” In this sentence “high-quality” applies to all characteristics.
22	Housing	Pleasing to see housing quality touched on here. It would also be good to mention housing that caters to different groups (e.g. singles, couples and families), have adequate kitchen space that allow for healthy cooking at home, and include communal green spaces. It would be useful to develop specific guidelines regarding the type and quality of housing to be built.
24	“Invest in supporting infrastructure, such as: – social infrastructure, transport and services”	This is a very general statement that doesn’t say much at all. Public and active transport needs to be mentioned specifically. Investing in more roads does not address accessibility, environmental or health concerns.
25	“Accessible participation in community life: Community participation is hampered by non-accessible buildings, costs, transport and outdoor spaces, particularly affecting people with disability and older people	Accessible participation is also affected by the design of public transport routes and service frequency. Currently, many bus services (at least in Melbourne) have long, winding routes, meaning that it takes a very long time for passengers to reach their destination. In addition, numerous services don’t run frequently or even at all on weekends and weeknights. This poses a severe limitation on people being able to participate in community life.
29	“Future investment should also seek to make public and active transport into more attractive modes of travel. This means the delivery of public and active transport infrastructure needs to be well-planned for safety.”	We strongly support efforts to make public and active transport more attractive modes of travel. While safety considerations are extremely important, this is not the only factor that influences the attractiveness of public transport, and should not be limited to this. As previously stated, there is also a need to improve route design, frequency of public transport as well as accessibility of services and stations/stops.

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31	Transport emissions:	<p>We strongly support the push for a modal shift to active travel and public transport. While it will be important to electrify public transport, and support electric micro-mobility options, we caution against too much emphasis on the electrification of personal automobiles. As recent modelling from Monash University's Climateworks Centre has shown, decarbonisation of the transport sector needs to go beyond shifting to EVs.</p> <p>A reduction in the total number of vehicles on the road needs to be a clear aim in order to support climate, health, liveability and safety objectives. As such, we advocate for emphasising the Avoid and Shift components of the global ASI framework.</p> <p>We support the call for mode share targets.</p>
32	Green spaces	<p>We support highlighting the important role that green and blue spaces play in supporting the uptake of active transport and mitigating the urban heat island effect.</p>
32	Possible actions	<p>Establishing mode share targets should be included in this section.</p>
34	Walkability and rideability of urban areas	<p>We support highlighting the importance of walkable and rideable urban areas.</p> <p>We would like to suggest that these factors can also link into public transport uptake as people need to travel to their public transport station/stop and will likely choose to travel by car if the walkability and/or rideability is poor.</p>
35	Possible actions	<p>We suggest noting that walking and cycling networks should be linked into public transport networks. Furthermore, we suggest providing adequate bicycle parking at train stations.</p>
36	Transport and enabling infrastructure	<p>We are very happy to see acknowledgement of the problems associated with continuing to prioritise road infrastructure as well as the importance of safe, accessible and affordable options for active and public transport.</p>
37	Efficient, low-cost, accessible and reliable transport networks	<p>We suggest recommending that cities prioritise areas with poor public transport coverage, particularly if they are also low-socioeconomic areas. We also suggest noting the financial benefits that can accrue to households who are able to use active and public transport modes, rather than relying on multiple private vehicles.</p>
38	Possible actions	<p>We suggest including "public transport" under the second bullet point.</p>
	General	<p>We would welcome more detail on aims related to active and public transport, including clear targets, e.g. for mode share.</p>