



WalkSydney Inc
Level 4, 68 Wentworth Ave
Surry Hills NSW 2010
david.martin@walksydney.org

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Assistant Secretary, Jo Hutchinson
Cities and Suburbs Unit
Department of Infrastructure, Transport, Regional Development,
Communications and the Arts

Draft National Urban Policy

As the peak body advocating for walking in the Greater Sydney region, WalkSydney welcomes the opportunity to provide input into this draft.

Precis

WalkSydney welcomes the Federal Government's decision to issue a new draft National Urban Policy and its draft objectives. As a broad overview, we make the following observations:

Strengths	Weaknesses	Opportunities
<p>Strong objectives, and areas of focus that cover most of the major topics facing urban areas.</p> <p>Recognises the importance of active lifestyles as well as the need for active transport to support this, as well as decarbonisation of transport (Objectives 4 and 5).</p>	<p>Goals are broad and duplicate and diverge from objectives.</p> <p>Discussions and 'possible' actions result in no specific, measurable direction, and room to avoid change.</p> <p>A lengthy document that does not have a clear centre that can be used to measure alignment of state policy.</p>	<p>Be succinct and metric-driven. Divide the 7 objectives into components aligned to SDG 11.1 - 11.7 and 11.B, 3.6, 6.4, 6.6, 8.4, 9.1, 9.C, 12.2, 12.5 (16 principles).</p> <p>Tie Federal funding to policies and projects that can demonstrate alignment to the policy, funding active transport and applying rigorous carbon tests on new road building.</p>



Why the National Urban Policy Needs to be Strong on Active Transport

As your draft policy already succinctly states, *“Achieving net zero emissions by 2050 is a priority for cities, requiring emissions reduction in transport... . A modal shift to active and public transport and electric vehicles can significantly lower emissions and improve air quality”*

The Federal Government’s own [Transport and Infrastructure Net Zero Roadmap](#) refers active transport delivery back to the states (p 23) and handballs guiding the states back to [this policy](#) - *“The National Urban Policy will present a shared government vision for cities which are more productive, equitable, resilient, sustainable and liveable. **Future active and public transport infrastructure planning may be guided by the National Urban Policy**, noting the different roles and responsibilities of each level of government.”* (at 24). As it contains no mitigation strategy for car emissions (the largest source) other than EV, if the NUP does not deliver strong policy on active transport, no Federal policy will.

Taking NSW as an example of the risk of no Federal policy on active transport, while ostensibly committing to policies like densification and Net Zero, is seeing a continued decline in active transport, even in the urgent issue of children walking and cycling to schools - the one policy area where they have taken any action. They have in the last two budgets committed less than 0.7% of the transport budget to active transport, while spending billions on new roads. It is also failing on integrated land use policy - while stimulating some transit-oriented development, is simultaneously planning for **18% of growth to be in greenfield areas** (despite Sydney already being 12,000sqkm, the size of two Greater Mumbais (2x21million people), eight Greater Londons (8x8.9mil), fifteen Grand Paris’ (15x11.2mil) or New Yorks (15x8.2m)). It has room enough to grow already, without destroying the peri-urban food and koala belt.

The Federal Government is directly contributing to this, most recently by co-funding a further \$660m to duplicate Elizabeth Drive, on top of \$1.6bn for the M12, \$1.9bn of Western Sydney Roads package, and \$200m local roads package - **\$4.4bn on roads** that will directly induce car traffic. It will no doubt commit further to this carbon cloud, for example the recently announced Appin Road upgrade (while the lone bus corridor the state has pledged for Greater Macarthur will peter out before Macarthur). The Infrastructure Policy Statement (IPS) clearly is doing nothing to prevent this, perhaps because it needs a strong National Urban Policy with clear tests and metrics to drive it to specific outcomes, and \$100m of Federal active transport funding (2.2% of the Federal funding of Western Sydney roads alone) is a drop in the ocean.

Yet, at the moment, there is no unifying policy or metrics to achieve this outcome. The NUP is the last chance for the Federal government to set strong policy to shift states of inertia like NSW towards a low carbon future.



How Urban Policy can Achieve This

Left-leaning governments worldwide are already moving towards low carbon cities through strong urban policy on walking and cycling - **setting targets, funding active transport infrastructure, and establishing investment tests for road building:**

Sadiq Khan, since becoming Mayor of London, has set a goal of “*for 80 per cent of trips in London to be made by active, efficient and sustainable modes (walking, cycling and public transport) by 2041*” ([Travel in London](#), 2023). A [GLA report](#) also found that some Londoners (26 per cent) also report to be using ‘free transport’ (walking and cycling) to manage living costs. This tends to be higher for inner London residents (32 per cent) and those living in private rented accommodation (34 per cent) - so supporting walking and cycling is also part of the Mayor’s push for greater social equity.

Anna Hidalgo, as Mayor of Paris, pledging to ‘end the car-centric model’ has in 12 years transformed the capital city, laying 1,300km of bike lanes, heralding a 40% drop in air pollution since 2014. While she struggles in popularity in general, this move to green transport remains her [most popular policy, with 66% support](#) in 2023. Vehicle kilometres are now falling and walking growing in the whole of Ile de France (the equivalent of the Sydney Region), with 40% of trips are walked, and 22% by public transport, vs 34% by car. *Source: [APUR](#)*. As a result, they predict that vehicle emissions have already peaked in France, while in Australia we project them to continue to grow to 2030 (*CCA [predicted vehicle emissions to 2030 vs \[Emissions for transport in France\]\(#\)](#)*)

Marianne Borgen, as Mayor of Oslo from 2015 to 2022, brought down casualties 350% and FSIs 500% within the city, to 1 (driver), and zero (pedestrians and cyclists) - the first city in the world to achieve Vision Zero. They did so by pledging to reduce car traffic by 1/3rd, designating bus and bike lanes and closing streets, making the city centre car free, and building cycle infrastructure. When Jonah Gahr Støre was elected Labour Prime Minister of Norway in 2021, some of these initiatives were enshrined in their national 2022 [Plan of Action for Road Safety](#), setting national targets for reducing walking FSIs by 25% for all walkers, and separately for over 75yos, and also a 25% reduction for cyclists. The measures (page 30) are almost exclusively focused on new and improved walking and cycling infrastructure.

In the UK, an [English Roads Review](#) and [Welsh Roads Review](#) both found that spending money on new roads was inconsistent with Net Zero trajectories and customer needs. As a result of the review, Lee Waters introduced 20mph (30km/h) speed limits in Wales and adopted new tests for roads investment, being that “*the Welsh Government will consider future road investment only for projects that:*

1. *Reduce carbon emissions and support a shift to public transport, walking and cycling*
2. *Improve safety through small-scale change*
3. *Help the Welsh Government adapt to the impacts of climate change*
4. *Provide connections to jobs and areas of economic activity in a way that maximises the use of public transport, walking and cycling”*



Recommended Changes to the National Urban Policy

The vision

A good vision should be specific enough to set a direction and enable a rapid assessment of whether objectives, strategies and plans are aligned. We recognise that the vision is a work in progress, and suggest that it contains enough ‘hooks’ to be useful in directing future policy at a state and local level.

To this end, we counsel against an ambiguous vision like *‘all urban areas are liveable, sustainable and productive...’* and recommend specificity like *‘To make Australian urban areas thrive and reduce our carbon footprint, Federal, state and local governments will deliver liveable and adequate houses close to services and jobs...’*

Goals and Principles

Currently the goals are ‘themes’ and the principles are akin to ways of working. Using an evidence base is not a principle, but a minimum expectation of good policy. A better approach would be to split out the vision into goals, each with a series of principles aligned to SDG Goal 11 (3, 9 and 13) targets, for example:

Goal	Principles for achieving the goal
<i>Liveable and adequate housing close to services and jobs</i>	Deliver safe and affordable housing for all [SDG 11.1] through supply of social housing and setting affordable housing targets
	Deliver affordable and sustainable transport systems [SDG 11.2] by locating new housing around stations and transit corridors, or within a walk or cycle distance of centres
	Protect cultural heritage [SDG 11.4] ... etc
<i>Sustainable urban areas by protecting peri-urban green space, hazard avoidance and more green and blue infrastructure in cities.</i>	Deliver inclusive and sustainable urbanisation [SDG 11.3] with growth boundaries, sustainable water use and urban greening.
	Minimise the risk from natural disasters [SDG 11.5] by protecting arable and ecological peri-urban land and no new development in future hazard zones... etc



Make Federal Funding Contingent on the Policy

To give the National Urban Policy effect, and achieve alignment across jurisdictions, consider using the National Urban Policy as a litmus test for funding state projects. For example, the current Objective 3 reads “*Achieving net zero emissions by 2050 is a priority for cities, requiring emissions reduction in transport and buildings. A modal shift to active and public transport and electric vehicles can significantly lower emissions and improve air quality. The transition to a circular economy can reduce waste and resource consumption*”. If this was turned into a series of questions against which a specific co-funding arrangement was sought (for example, below, the \$770m recently announced for NSW’s Elizabeth Drive), you could evaluate whether to co-fund that project as follows:

Objective 3 (Sustainable) Measures	Does Elizabeth Drive align to this?
Reducing emissions in transport [and buildings]	This project is predicated on a very high car mode share and will induce new car trips and growth in vehicle kilometres
Mode shift to active and public transport	This project will not encourage mode shift to public or active transport modes
Electric vehicle uptake	This project will not encourage EV
Circular economy	This project will not encourage a circular economy
Summary:	Not aligned

Be Succinct

Don’t give policymakers places to hide. The US Bill of Rights is 652 words (including a 170 word preamble). The Universal Declaration of Human Rights is 1300 words. Condense the policy down to 20 pages (<5,000 words) of text:

- a Summary (that can be used to assess and policy or investment)
- 2 pages of preamble (vision, goals, principles); and
- ‘Part 4’ summary and 16 principles, (aligned to SDG 11.1 - 11.7 and 11.B, 3.6, 6.4, 6.6, 8.4, 9.1 and 9.C, 12.2, 12.5), each 1 to 1.5 pages maximum;
- Strip each principle of the extraneous discussion and call-outs and instead provide 2 - 5 specific, measurable outcomes.

By way of example, we have reformulated the first and fourth objective (relating to active transport) on the next 3 pages, as a template for doing so:



~~No one and no place left behind~~ *Deliver safe and affordable housing for all [SDG 11.1]*

Policy Statement: To create equitable urban areas where everyone feels safe and secure, access to housing, infrastructure, education and jobs is essential. ~~Housing affordability remains a major issue, especially in urban areas, due to a shortfall in Zone sufficient diverse, well-located housing and demand outpacing supply. Limited~~ Require walkable access to social services and transport for new homes, particularly in outer urban areas also contributes to inequity among communities. Addressing these problems requires initiatives to [I]ncrease social housing supply, improve access to mandate a minimum percentage of housing that is affordable, and invest in transport and social infrastructure, [d]ensification and infill development. can also increase sustainability.

Key urban challenges and the required response

–Housing availability: Governments must ensure supply keeps pace with demand for housing through new approvals, uptake of existing approvals and directly supplying housing. ~~is outpacing supply, leading to shortages that negatively impact affordability, rental vacancy rates, and housing ownership rates, especially for younger households.~~

–Housing affordability: use inclusionary zoning for ~~A lack of well-located, diverse housing options is causing stress for an increasing number of households.~~

–Homelessness and overcrowding: ~~These persistent challenges in urban areas are particularly affecting marginalised communities, including directly supply adequate quality housing for First Nations people, people with disability, and low-income households.~~

–Access to social services and transport: All new housing and housing uplift must be in land that will be served by frequent public transport, or within a walk and cycle distance of a centre, by the time of sale. ~~Outer urban areas particularly face access challenges, creating equity issues and isolation for residents.~~

–Urban development patterns: Set an urban growth boundary to protect peri- urban ~~Continued outward growth contributes to sustainability concerns, loss of agricultural land, and nature. increased greenhouse gas emissions, urban heat island effect, high material footprint and greater infrastructure investment needs.~~

NUP Dashboard 1

Indicator	Key Metric	Target
1.1 Housing Availability	Current approved housing* and housing under construction, state-wide as a ratio of population change	>1:1
1.2 Housing Affordability	Ratio of ISRAD 1 - 3 adults, to current affordable (30:40) housing under construction or available in the state	<1:1
1.3 Homelessness and overcrowding	Number of homeless people on census day. Ratio of number of people to number of bedrooms, in each SA1.	Zero, <3:1



<p>1.4 Access to social services and transport</p>	<p>Percentage of people within (total of):</p> <ul style="list-style-type: none"> - 800m of a train or metro station, or - 400m of a bus or light rail stop, with a frequency of 4 or more services an hour (7a - 10p, 7d), or - 5km of a centre, along a segregated cycle path for 90% of the journey, or - 800m of a centre, otherwise. 	<p>>90%</p>
<p>1.5 Urban Development Pattern</p>	<p>Significant Urban Area (ABS), and urban density within the SUA.</p>	<p>No change, >10 per sqkm</p>

**This is a better measure than monthly approvals as this recognises there may be an industry bottleneck if there are historic approved, valid but abandoned approvals.*

Required Possible Actions for State and Local Government

- Develop housing targets that align to projected growth (adjusted for undersupply) to 2030.
- Develop a shared data platform that tracks housing and infrastructure supply and demand across all states and territories, by 2026.
- Each state is to zone a minimum of [20%] of cities as additional medium density or higher, and ensure these are close to frequent transport, parks, schools and jobs, by 2025.
- Set a minimum number of social and affordable (30:40) houses to be delivered each year
- Each state to set urban growth boundaries around each metropolitan and regional city, and tests for expansion of regional towns, by 2025.

~~*Our urban areas are sustainable*~~ *Deliver affordable and sustainable transport systems [SDG 11.2]*

Policy statement: Support urban areas to improve sustainability and achieve net zero emissions by 2050 in transport systems by locating new housing around stations and transit corridors, or within a walk or cycle distance of centres. This will include ensuring strategic planning, land use and infrastructure frameworks are co-ordinated around transport nodes, new transport is delivered in 'transit deserts' and new local centres within walk and cycle distance of all existing houses ~~improve climate mitigation, and aid the transition to a circular economy.~~

Key urban challenges and the required response

—Net zero and urban emissions reduction: All new housing in urban areas to be located around stations, transit corridors or within a walk or cycle distance of centres ~~need in order~~ to transition to a lower carbon future and achieve net zero emissions by 2050 ~~to align with global climate goals & Australia's commitments.~~



~~—Transport emissions: Transport is a major contributor to urban emissions, making up 21% of Australia's greenhouse gas emissions. A modal shift to 64% of all trips being made by active travel, or public transport and electric vehicles are critical for emissions reduction by 2030. [per Climate Council's [Shifting Gear](#)]~~

~~—Building and construction emissions: Buildings contribute significantly to greenhouse gas emissions. Improved energy performance and sustainable materials can help decarbonise the built environment. [Move this to its own objective aligned to SDG 8.4]~~

~~—Circular economy and sustainability: Transitioning to a circular economy in urban areas is essential for reducing waste and repurposing materials, thus supporting sustainability and climate action. [SDG 12.5]~~

~~—Green and blue spaces: A lack of or inequitable distribution of natural spaces in urban areas can impact on biodiversity and climate resilience. [SDG 11.7]~~

NUP Dashboard 2

Indicator	Key Metric	Target
2.1 New Housing around Sustainable Transport	Percentage of new housing* within (total of): - 800m of a train or metro station, or - 400m of a bus or light rail stop, with a frequency of 4 or more services an hour (7a - 10p, 7d), or - 5km of a centre, along a segregated cycle path for 90% of the journey, or - 800m of a centre, otherwise.	100%
2.2 Total sustainable transport	Percentage of all non-freight trips made by non-car modes	On track to reach 64% by 2030**

* This is aligned to Target 1.4, the lag indicator for the total population

** This would highlight the need for rapid and meaningful action, year-on-year.

Required Possible Actions for State and Local Government

—Reform urban planning and zoning rules to support emissions reduction outcomes, including prioritising mixed-use neighbourhoods that are close to amenities and employment and encouraging lower emissions active travel, such as walking and cycling

—Support the development of a national approach to developing urban areas which addresses current and projected climate risks and prioritises preparation and mitigation over rebuilding.



Appendix: Other considerations for the National Urban Policy

Child-Friendly Cities

Many urban centres have become unfit for children, the elderly and for people with disabilities. Current transport and traffic management practices give too much priority to motor vehicles, even in residential neighbourhoods, around schools and public transport nodes. Changes to our land use and transport policies have the potential to remedy these deficiencies.

The UN Convention of the Rights of the Child has been complemented with [guiding principles](#) on how to build a child-friendly city, which has been adopted across much of the western world, but not Australia. Some of which could be incorporated as actions in the NUP, such as:

- Participatory governance that includes childrens' participation in decision making, and accountability for decisions affecting children
- [Initiatives](#) like incorporating play into urban environments 'beyond the playground', or new spaces for children like the '[Maison des Adolescents](#)' where teenagers and their parent learn necessary life skills and how to get on

Specifically (with regard to walking), behavioural research indicates that there is a sizable demographic cohort who would walk and bicycle in a less threatening road environment. This was evidenced in the COVID lockdown period when motor traffic volumes were greatly reduced. Not only were more people walking and cycling, there was a wider social cross-section. This is particularly important for children because:

- They cannot drive on their own, and
- Their social cohort is typically within a walk or cyclable distance (due to the school catchment),

So fostering the ability for children to move freely about their neighbourhood is a core building block to their independence and self-ideation. It can also combat social isolation - a key consideration in reducing youth suicide.

More walking and riding can and does occur if the right policies are put in place to make it a realistic choice, such as school streets (or in Norway, '[heart zones](#)') which establish car-free zones around schools. This has a range of co-benefits including:

- improved physical and mental health,
- reduced congestion (particularly at school pick up and drop off)
- reduced road trauma and road violence, as a consequence of reducing vehicle speeds to support walking and cycling (eg. *Beyond Vision Zero* in Scandinavia).

The NUP should at least include metrics to increase walking or cycling to schools.



Road Safety and Road Funding

Currently the Federal Government funds a substantial portion of road safety at state level, in some cases tied to walking and cycling as a percentage of that funding. Nevertheless at the moment these initiatives are typically spent on 'anti-walking' infrastructure like pedestrian fencing and overbridges, while the key levers to increase both road safety and walking, like reducing speed, are neglected.

[PATH](#) have noted substantial forward motion is created by countries that have good Walking and Cycling Policies, linked to funding and indicators. Australia subsumes it into an outdated Road Safety policy (ironically achieving little change in walking and cycling safety).

The UNEP also recommends a [set percentage of funding for active transport](#) in their policy on non-motorised transport (NMT). As they explain, this strongly motivates agencies to focus on improving walking and cycling. In a later publication they [recommend this amount is 20%, and tied to measurable goals](#).

This has now been adopted in Ireland (as 10% walking, 10% cycling), and their Sustainable Mobility Policy will halve transport emissions by spending €1.5m *per day* on active transport. Scotland, Wales too have active transport targets.

A key component for creating safe, liveable cities concerns speed limits, particularly the default speed limit. 30km/h (and below) is the only safe speed for mixing motor vehicles with people walking, rolling (eg wheelchairs, strollers) and riding bicycles. 90% of people hit by motor vehicles survive (vs 10% at 50km/h).

There is overwhelming evidence of the benefits of lower speed limits such as :

- a significant reduction in serious injuries and death for people especially vulnerable road users involved in a vehicle crash
- enhanced mental and physical well-being by creating a more inviting and comfortable environment for walking and riding
- reduced noise and air pollution, and
- increased community livability and vibrancy as people can use streets to connect and engage in public life.

Scandinavia has moved “Beyond Vision Zero” and are now achieving low road deaths and serious injuries by slow speeds and investing in walking and cycling. This is the beauty of 30km/h, for low traffic roads (most local roads) the speed it is comfortable to walk beside, or cycle along the road - so infrastructure can be focused on the larger roads where separation or buffers are required.

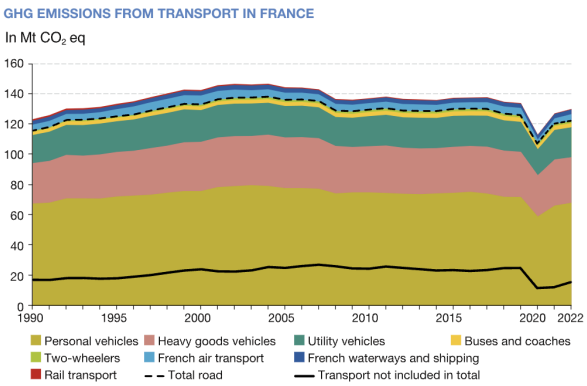
The NUP should require action to focus road safety funding on speed reduction.



Mode Shift and Transport Culture

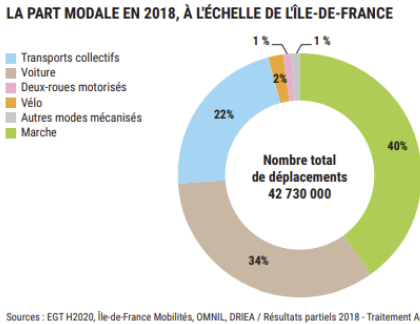
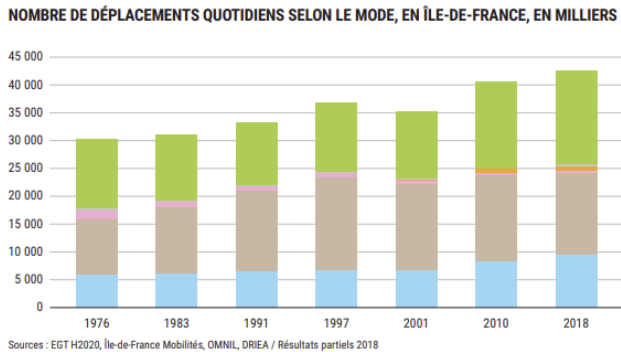
Mode shift is key to low emissions transport. The countries that are changing their transport emissions the fastest are doing so by embracing mode shift. Compare Australia, where the CCA are predicting GHG emissions to *rise* from cars, vs France where GHG emissions from transport are stable and falling, particularly cars:

We need to reorient Transport agencies business towards low-carbon transport. Transport is the second largest emitter after energy production. Nationally, the CCA predicts transport emissions to continue to rise until 2030 - despite assumed electric vehicle uptake. [CSIRO](#) models an undershoot on that EV uptake projection unless efforts are ramped up. Conversely, nations that have encouraged mode shift are seeing less cars on the road, and flat or falling transport emissions. France, for example, has personal vehicle emissions below 1990 levels, while London accommodates 5 million more trips than 2000 with 1 million fewer cars (Travel in London, TfL).



CCA predicted vehicle emissions to 2030 vs Emissions for transport in France

This can be directly correlated to the high and rising non-car modes in major cities in France through policies such as [halving parking spaces \(and taxing SUVs\)](#), to achieve mode shift and flatten Transport sector emissions:



Images: Vehicle kilometres (falling) and walking (growing) in Ile de France (their equivalent of the Sydney Region). Source: [APUR](#)



London has built no new urban roads since 2000, has reformed the bus fleet, introduced a congestion charge and an ultra-low emissions zone, and massively increased cycling infrastructure. It is now focused on improving walking. Paris has halved on-street parking, is charging more for SUVs and has banned cars from the major arteries of Paris. Rue de Rivoli has gone from seven lanes of traffic to one, and is filled with cyclists. On Sundays, whole areas are closed.

The issue is one of a strong car bias - ‘motor-normativity’ certainly in NSW and in many other Australian cities. We need to reduce car mode share that reports like the Climate Council’s ‘Shifting Gear’ suggests are required for an equitable and transformative transition - down to 37% car mode share (from Sydney’s 67%). We need strong willed governments - a requirement through the NUP to minimise transport emissions and build infrastructure in accordance with a road-user hierarchy that puts walking first. **The NUP can and must counter bias in transport planning practice and the development industry of blindly catering for a high car mode share.**

For example, while NSW has a Transport strategy and targets that aim for a shift in mode share to active transport, this has virtually no funding (Under 1% of CAPEX) and no senior accountability. Even when \$23bn is spent on a bypass motorway, the strategic cycleway on the surface road bypassed is not delivered. Meanwhile, TfNSW spends more on four motorways than on all buses, trains, trams, bikers and walkers.

NUP could recommend that Federal funding is linked to achieving specific active transport goals (including funding), such as an incremental ramp up to 20% of the Transport CAPEX budget as recommended by the UNEP, that this is legislated, ring-fenced from other projects (for example only for the cycleway cost of a larger road project), and carried over to future walking and cycling if under-spent.

Further the NUP could require an action that states and local councils develop a proper multi-modal assessment strategy to put walking and cycling first, and minimise car use. In London, a mandatory Healthy Streets Transport Assessment starts by identifying all the destinations within walking and cycling distance required to support a car-free lifestyle, and then identifying what infrastructure supports accessing them. Where infrastructure is missing, the development must contribute to that infrastructure being built.

The NUP should therefore require state and local governments set:

- a mode shift target, to achieve no more than 36% car mode share by 2030
- a trajectory to 20% active transport spend (as a proportion of transport spend),
- all development be assessed multi-modally and aim to minimise car use



The role of the Federal Government / NUP vs States and Local Governments

The draft National Urban policy poses the question of the Australian government's most effective role within the Federation, where States have primacy in key areas of urban and transport planning and provision. WalkSydney offers the following:

Achieve better understanding of the obstacles to change at political, administrative and community levels through analysis of government policy and institutions and by undertaking community and market research. Then **develop a model framework of planning and transport strategies and policies to guide the re-orientation of the state transport and planning systems.**

The Policy should be supported by model policies and guidelines for urban planning and development. These would include guidance to make urban precincts highly walkable, and complemented by public transport.

A desired transport outcome needs to be articulated for cities and suburbs of frequent and reliable public transport complemented by walking and cycling networks. The Movement and Place model sets out an approach. It requires a top-down overhaul of State transport planning and traffic management, and can extend to local councils.

The allocation of Federal funding for States for transport and planning should be conditional on demonstrated progress in implementing the NUP. This would include calling for pilot/demonstration projects that achieve desired policy outcomes, and balance in states' own decisions, such as:

- the right proportion of public transport and active transport funding (not 99% road funding), in order for road co-funding to be unlocked, or
- between greenfield and brownfield development (not 18% greenfield development), for Federal housing funding to be unlocked.

We look forward to seeing a final Policy supported by a strong, clear roadmap for further progress.

Yours sincerely,

Marc Lane and David Martin
President and Vice President, WalkSydney