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To the NSW Environmental Protection Agency,

This is the WalkSydney submission on the Draft Climate Change Policy and Action Plan.

WalkSydney is the peak advocacy group working to make it easier, safer and more pleasant to walk in Sydney. WalkSydney's vision is that "Walking will be convenient, accessible, safe and enjoyable for everyone."

In particular, our submission relates to

Draft EPA Climate Change Policy

2.0 Mitigate and reduce greenhouse gas emissions

- *We support our regulatory partners to understand and consider greenhouse gas emissions and climate change mitigation as they make land-use planning decisions.*
- *We encourage and support the broader community and businesses in general to minimise greenhouse gas emissions and increase carbon sinks in NSW, by using education, behavioural change programs and other innovative approaches.*

Draft The Climate Change Action Plan 2022–25:

- *Continuing action 2: Engage and collaborate with climate change experts across the NSW Government, and with other jurisdictions, as the EPA develops and implements its climate change actions*
- *Continuing action 6: Develop and implement tailored behavioural change programs to encourage and enable greenhouse gas emission reductions.*
- *Continuing action 9: Lead by example, maintaining efforts to become a carbon-neutral organisation by 2030*

With a growing population we need to ensure people can easily walk, ride and catch public transport to local shops, services and places. The EPA draft Climate Change policy and Action Plan recognise the impact that the transport sector has on greenhouse gas emission but both documents are weak and silent on any action to address these impacts.

We welcome the partnerships with Transport for NSW, Department of Planning and Environment, and other NSW Government agencies. However, it is not clear that the partnership with Transport for NSW will result in real emissions reductions in the transport sector, as shown on page 33 of the Action Plan (transport projected to emit ~16 Mt CO₂-e in 2050). As transport currently accounts for 20% of total



emissions, or 28 Mt CO₂-e, and emissions are arising, this is a crucial missing element of the EPA Climate Change Policy and Action Plan.

We therefore call upon the Environmental Protection Agency to work more closely with Transport for NSW to implement policy changes and ensure that transport emissions fall in line with current NSW Government targets. In order to plan for and implement a healthier and zero emission transport sector in NSW, structural changes from other jurisdictions are instructive, e.g., the creation of Active Travel England.¹

We believe that the EPA has a role to play in helping shape NSW policy, so that people would transition to more sustainable forms of transport - including more walking and cycling and public transport. Half of car trips taken in Greater Sydney each year are less than 5km, and a significant proportion are under 2km.

The EPA's draft plan should be part of the NSW Government solution to address this problem by:

- Transparently and robustly accounting for greenhouse gases from the sector and asking regulatory partners (eg: TfNSW to develop a plan to reduce emissions) . This action must be specifically called out in the draft strategy, and cannot be left up to TfNSW. The electrification of the TfNSW bus fleet will not be implemented until 2045 at current rates of investment, and ought to be expanded as services grow and improve.

EPA draft action plan must include:

- 1. Specific targets and mode shift changes for TfNSW to report to the Community about greenhouse gases from transport.**
- 2. Behaviour change programs for transport modal shift, e.g. walking and riding to school,² Idle Off³**
- 3. New offset opportunities for private sector to invest in infrastructure to support people walking and cycling.**

In addition, WalkSydney recommend these changes be made to NSW Government policies to support more people walking and riding bikes:

- **Road Rules should Prioritise Pedestrians**
 - Introduce a hierarchy of road users – those who can do the greatest harm have the greatest responsibility to reduce the danger they may pose to others
 - Implement presumption of driver fault in crashes, unless driver can prove otherwise
 - Ensure drivers and riders give way to pedestrians crossing or waiting to cross the road at every intersection without a signal, from every direction (every intersection a crosswalk)

¹ [Active Travel England - GOV.UK](http://www.gov.uk)

² [Ride & Stride - Zero Carbon Merri-bek](http://www.merri-bek.com)

³ [Idle Off](http://www.idleoff.com)



- **Better Intersection Crossings**

- Reduce waiting time (shorter cycles)
- Increase walk signal duration
- Provide [legal pedestrian crossings at all movements](#).
- Increase the use of [Wombats](#) (raised pedestrian crossings).
- Implement [Pedestrian phases](#) as the default condition, so no beg button (pedestrian actuation) required.
- Install Leading Pedestrian Intervals (LPI) at all intersections with pedestrians present.
- Detect pedestrians [automatically](#) at all intersections (prioritise those with more pedestrians). Implement pedestrian detection technology (as used in Queensland and Victoria) that adjusts signal timing for people walking (shorter waiting times and longer time to cross the road).

- **Develop an offset fund for private enterprise to support sustainable transport infrastructure to:**

- Provide active transport [connections](#) to destinations, existing local infrastructure, and known walking/riding routes across the Greater Sydney area.
- Fund public domain works around schools to overturn the widespread practice of drive-to-school, delivered by local government
- Fund network of protected [bicycle lanes](#) (not shared paths) for delivery by state and local government
- Improve and plant trees on our streets by planting climate resilient trees to form dense, cooling canopy

- **Reform institutions to support greenhouse gas reductions**

- Reform Local Traffic Committee so that one of their objectives is to create streets environment that have less greenhouse impacts plus a voting member who represents public health eg: make it easier to walk and ride
- Remove political intervention in the short-listing of TfNSW (RMS) Walking and Cycling Programs (grants). Presently recommendations are made by officers, this list of recommendations is then provided to State MPs and can then be altered and reviewed and is then implemented according to a political rather than Community need. .

- **Retrain and refocus Transport engineers to provide sustainable and safe environments:**



- *Retrain* local government traffic engineers and road safety officers on road designs to provide walkability.
- *Retrain* TfNSW (RMS) traffic signals team about access by walking and bicycling .
- *Retrain* NSW Police on the NSW Road Rules as they apply to pedestrian access

Monitor, measure and innovate

- Regulate Government, industry and businesses to report their contribution to transport greenhouse emissions and develop plans to reduce impacts, e.g. all police to be trained to ride bikes, and have access to these for work purposes.
- *Advocate* to the Federal Government to innovate and *require* speed limiters in all new vehicles as soon as possible (similar to the European Union), and retrofit current vehicles as soon as possible to reduce dangerous speeds and reduce greenhouse gas emissions from vehicles.
- **Lead by example**
 - *Change workplace and executive culture:* where possible, offer free public transport, or support employees to use active transport, rather than company motor vehicles leaseback arrangements consider leaseback for electric bikes etc. Include active transport targets and KPIs in executive contracts.
 - Develop a bike fleet for EPA officers to use, similar to the City of Sydney bike fleet.
 - Advocate for these fleet arrangements to be replicated in other Government departments

Thank you for taking the time to read our submission. Please do contact us if you would like to discuss any points further.

Yours sincerely,

Tegan Mitchell and Anna Harvey

Board Member, WalkSydney

