



THE PEAK BODY FOR WALKING IN GREATER SYDNEY

Roads Act Review Submission



King Street, Newtown 1889

King Street Newtown is always more or less busy, but on Saturday night it is seen at its best and brightest. Fancy a double line, more than a mile long, of brilliantly lighted shops; and **'side-walks' so inconveniently crowded, that it is often a matter of some difficulty to push one's way through the throng of people on business and on pleasure bent.**

The [Illustrated Sydney News](#), 1889

Streets are for people, it's time we give them back

World [Health Organisation](#), March 2021

Introduction to WalkSydney

WalkSydney is a community group advocating for walkability in Greater Sydney (Wollongong to Newcastle, and the Coast to the Blue Mountains). We are a non-profit organisation, governed by a [Committee](#).

Our vision - Walking will be convenient, accessible, safe and enjoyable for everyone.

Our Mission - WalkSydney works to influence the infrastructure, policies, decision making processes and institutions that shape the walking environment in Greater Sydney to overcome the physical, social and institutional barriers that may limit people's choices to walk.

www.walksydney.org



Introduction to Better Streets

Better Streets is the peak body for accelerating the adoption of safe, healthy, people-friendly, climate-friendly streets, across the country. Our policy experts, planning advisors and communicators liaise with media, advocates, community groups and businesses to help shape strategies and programs that lead to Better Streets.

We are building a [coalition of groups](#), businesses and individuals for Better Streets in Australia. Our coalition model and educational approach are the most effective way to ensure decision-makers and community leaders not only understand the opportunities but are well-equipped to shape a better future for our cities and towns.

Our vision for Australia is that our streets make people of all ages and abilities feel welcome, safe, and comfortable to walk, cycle and rest.

Our mission is to actively advocate for governments at all levels – federal, state and local - to significantly increase funding and delivery priorities for infrastructure, initiatives that support better streets for all and to adopt [our recommendations](#).

www.betterstreets.org.au

This Submission is in three parts:

- Part 1: Submission Summary
- Part 2: Systemic issues
- Part 3: Issues and opportunities for people walking (and riding)

Part 1 - Roads Act Review Submission Summary

Core Issues

The Roads Act review presents a crucial opportunity to restore balance to our transport system, which has prioritised cars over people for decades. This submission highlights key issues and recommends reforms.

Systemic Problems

1. **Car-Centric Planning:** Over 80 years, transport planning has prioritised vehicles at the expense of pedestrians, cyclists and public transport users.
2. **Lack of Clear Responsibilities:** Road authorities have no defined obligations to support integrated, sustainable transport or prioritise safety for all users.
3. **Inequitable Resource Allocation:** Despite billions spent on road expansion, only 0.2% of the NSW transport budget goes to active transport, far below the UN's recommended 20%.
4. **Stalled Safety Progress:** Road trauma remains high with 340 deaths in NSW last year, including 50 pedestrians.
5. **Climate Impact:** Transport is the second-largest source of emissions, while road infrastructure contributes significantly to urban heat.
6. **Governance Issues:** Road authorities have excessive unchecked power and fail to follow their own policies and design standards.

Summary of key reforms needed

1. Redefine Road Authority Duties

- Make it the duty of road authorities to maximize safety, environmental sustainability, and emissions reduction
- Prioritize active and public transport over vehicle capacity
- Operate roads equitably, prioritising accessibility for all users
- Implement the "Avoid-Shift-Improve" framework to transform travel behavior

2. Improve Safety and Accessibility

- Formalise the road user hierarchy to prioritise vulnerable users
- Reduce maximum speed limits in urban areas to survivable speeds

- Set maximum crossing spacing and wait times at pedestrian signals
- Establish minimum standards for walking and cycling infrastructure

3. Climate Action and Resilience

- Integrate carbon budgets into transport planning
- Prioritize tree canopy in the road corridor
- Create cooler, more walkable streets

4. Transparency and Accountability

- Require public disclosure of all planned road projects
- Mandate genuine early community engagement (Gunning Principles)
- Establish an independent review mechanism for community advocates

5. Funding Reform

- Institute an equity test for walking and cycling funding
- Provide compensation when active transport obligations aren't met
- Benchmark funding against international best practices

6. Local Decision-Making

- Abolish or reform Local Traffic Committees
- Empower local governments to regulate traffic and reduce speeds
- Recognize the role of land use authorities in managing travel demand

Opportunities for Transformation

1. **Shift Transport Goals:** Focus on reducing car dependency rather than expanding road capacity
2. **Governance Reform:** Consider separate Acts for urban and rural roads
3. **Active Transport Commissioner:** Establish an independent statutory role to champion walking and cycling
4. **Future Road Test:** Adopt a framework to evaluate new road projects against climate goals
5. **Digital Integration:** Recognise and regulate the digital representation of roads for smarter, safer dynamic management of wayfinding.

The Path Forward

The Roads Act must be redesigned with objects that align with the government's strategic outcomes, the Road User Hierarchy, and the Movement and Place

framework. This means prioritizing investment and infrastructure so that as many trips as possible are made by walking, cycling, and public transport.

Part 2: Systemic issues to address

1. We agree that it's time for a major rethink of how we design and operate the street and road network

The review of the Roads Act offers a vital chance to restore the balance and return streets to being spaces for all, not just for motor vehicles. Streets have always been a place for people to meet, to connect, to trade and to live.

Since the advent of the car this has diminished significantly. Over the last 80 years, transport planning has focused on cars at the expense of people who walk, ride, or rely on public transport. References in Part 9 of the Roads Act to street vending hint at the forgotten role of roads as public places, a function that has been largely erased over time (because they were not modelled). **Restoring this perspective is essential to making streets more accessible and vibrant for everyone.**

A key issue is the lack of clear responsibilities for road authorities to support safe, integrated, and sustainable transport. NSW road legislation does not prioritise non-vehicular road users nor does it prioritise short-distance mobility. With most trips in NSW under 5km, better infrastructure and policies could encourage active and public transport. Instead, transport planning presupposes long-distance travel, reinforcing car dependence, limiting mobility choices, and contributing to rising carbon emissions.

*Action: The New Act must make it **the duty of road authorities** to manage roads to **maximise safety, efficiency, environmental sustainability** and emissions reduction, and therefore **maximise active and public transport***

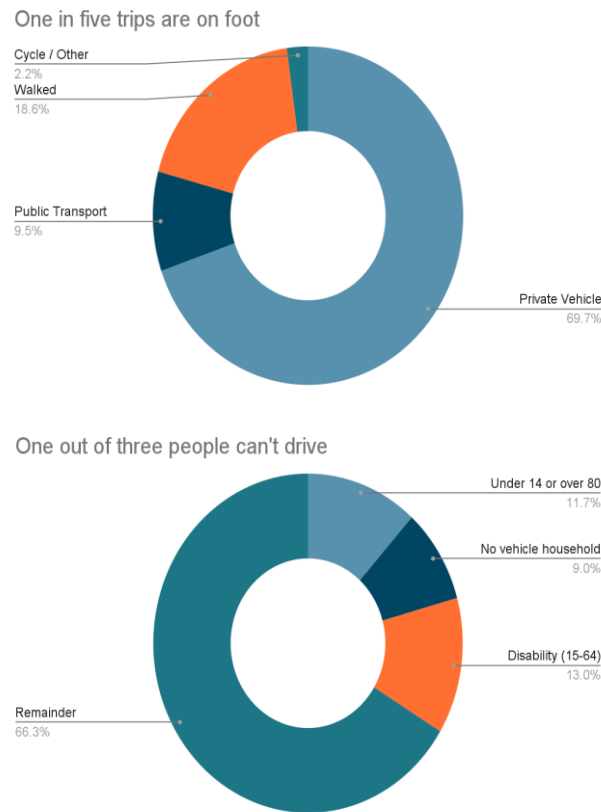
A fairer Roads Act must prioritise accessibility, ensuring *equitable access across all demographics*, including those who don't or can't drive, and rely on being able to walk, cycle or catch public transport.

The Act must prioritise sustainable transport if transport emissions (the second largest source) are to decline. This review is an opportunity to embed long-term sustainability by shifting the duty of road authorities from *vehicle* capacity to enhancing resilience.

Safety must also be a core principle. Safety at home is embedded in our National Construction Code, and safety at work through Work Health and Safety legislation, yet not on the roads between them. Accepting road trauma is a choice we make - that is the message at the heart of Vision Zero. The Act must deliver Vision Zero by requiring road space to be allocated to protect vulnerable users (such as regular crossings and separated bike lanes). Transport decisions such as speed zoning must reflect the safety needs of all road users, not just car drivers.

*Action: The New Act must make it **the duty of road authorities** to operate roads **equitably**, and to **prioritise sustainability and safety** over efficiency.*

The NSW and Federal government have allocated billions in road expansion projects in recent weeks, if instead the Government invested in prioritising walking, cycling, and public transport (in that order), the number of **car trips could be halved** and create healthier, more connected, and more liveable communities while reducing congestion and emissions and saving money that could be better spent on schools and hospitals.



Source: HTS (Greater Sydney GSSCA), ABS

The Roads Act review must deliver a better deal for the 40%¹ of people without a licence (and/or can't drive), and everybody else - whose journey starts with a walk!

2. Roads alone will not fix the congestion problem. Road [Use] Authorities must be more accountable for meeting the needs of people walking, riding and catching public transport.

The term 'road authority' implies duties that focus on tarmac, passively accommodating growth of prevalent traffic (i.e. predict and provide). Planning departments, by contrast, are not a 'land' authorities but 'land use', to be **planned strategically and re-zoned**. A 'road use authority' might better reflect the role we seek - not just control of the surface, but **strategic management and optimally re-allocated**.

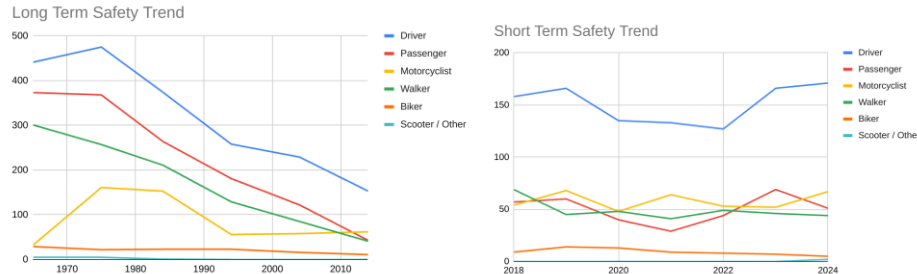
Australians (including people in NSW) feel they don't have any other choice but to drive². **Many feel forced to own a car** to get around, so investing in paths and public transport provides people the freedom to get around how they choose. We are at the

¹ Roads Act Review issues paper 2025 p31

² The [Conversation](#) (Feb 2025)

limits of what can be done with roads - they are already prohibitively expensive to build. Yet:

- **Congestion is getting worse** in most major cities and we can't build our way out of it with more or wider roads.
- **About two-thirds of car journeys in our cities could be walked**, wheeled or cycled in 15 minutes or less, but we have made it uncomfortable or impossible to do so through the design of our roads and too easy to drive a vehicle. As a result, these short trips, done by car, clog up our roads with traffic.
- **Our climate is changing, transport greenhouse emissions are the second largest contributor and are still increasing**, our streets making up at least 60% of urban public space are mostly black asphalt and are a significant contributor to the urban heat effect.
- At the Federal level **\$714 per person is spent annually on roads; 90 is spend on walking and riding cents** out of this \$714 is just pocket change. We don't measure our return on investment of that road spending either.
- In NSW (assuming a population of 8.3 million people) per capita expenditure is approximately \$3.61 **on walking and riding, equivalent to 0.2% of the state's total transport budget**. This under-investment has clear consequences, as it correlates to a decline in both walking distance and children walking over time.
- **Every year, thousands of Australians are hurt or die in road and other transport crashes**. In NSW last year 340 people were killed on roads, and 10,000 seriously injured. 50 people walking are killed annually - static for a decade - despite billions of dollars in road trauma reduction spending.



Longitudinally, our roads are safer than 50 years ago, but progress has stalled. Despite billions of dollars, NSW have roughly the same road deaths as in the 2010s.

- **Transport is the third leading cause of injury hospitalisations** in 2022–23 and the fourth leading cause of injury deaths in 2021–22.
- **In 2020–21, transport injuries are estimated to have cost the health system \$848 million**. For more detail, see the [health system spending report](#)

Far more serious are the indirect causes of death from the way we manage our roads:

- **Long driving times are unhealthy** - not only do drivers as a cohort singularly fall short of recommended physical activity levels (compared to all other transport users), but driving distance positively correlates to more smoking and drinking, and less fresh food consumption and sleep³.

³ Driving: A Road to Unhealthy Lifestyles and Poor Health Outcomes, Ding et al, 2014, accessed at <https://pmc.ncbi.nlm.nih.gov/articles/PMC4049576/>

- In 2018, obesity cost the Australian community \$11.8 billion and if nothing is done, may cost an estimated \$87.7 billion by 2032. The National Obesity strategy has a target to “reduce the prevalence of physical inactivity amongst children, adolescents and adults by at least 15% by 2030”.
- In 2021 the Bankwest Curtin Economics Centre reported that [Loneliness is associated with poor health behaviours](#) and costs up to \$2.7 billion each year (\$1,565 for each person who becomes lonely)

NSW response to these problems has been to build more and more roads illustrated below as a comparison between European solutions and Australia.

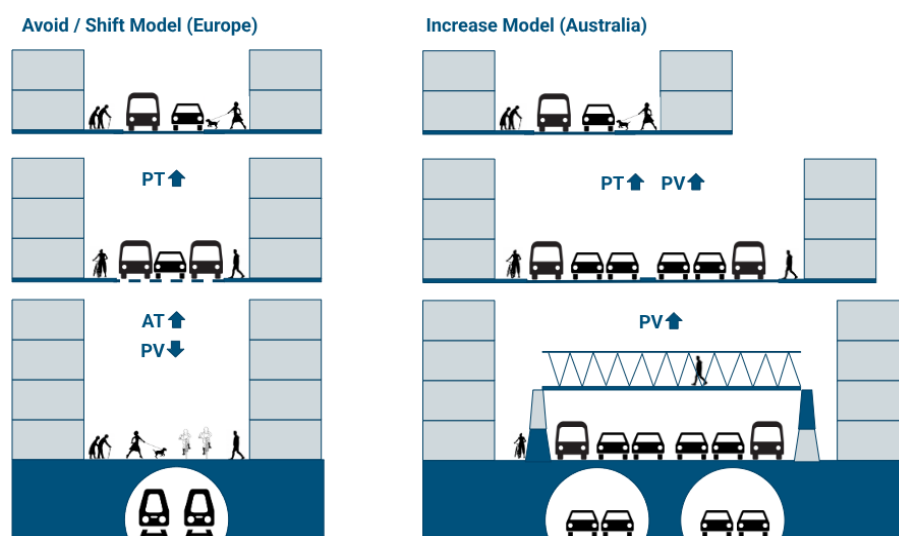


Figure 1 - Congestion busting in Europe compared to Australia

We cannot build our way out of congestion, or road trauma or climate change . If we could, we would have. Walking and riding are part of the solution.

Case Study: Victoria Road - Inner West Sydney.

Even if you accept Government costly decision to invest in more roads rather than public transport cannot be fixed in Rozelle, TfNSW refuses to transform Victoria Road into a people-friendly boulevard, missing the chance to promote walking, cycling, and public transport—ultimately reinforcing congestion and justifying future road expansions. The Community have no *footpath widening, no trees, no cycleways, no increase in bus frequency, no bus advance signals*

Action: The New Act must set rules in place to **limit the building or widening of roads**, to encourage road authorities to ‘**Avoid - Shift - Improve (ASI)**’ travel behaviour and **reverse the decline in walking**.

3. Road authorities have too much unchecked power

There is currently a *significant* power imbalance between Road Authorities and transport systems users - land owners, road users, land use planners and advocates. There is also a significant imbalance between local government road authorities and TfNSW. Road Authorities have a responsibility to act in the interests of the community and ‘*to achieve agreed outcomes*’ yet they have almost exclusive control of the road

system and exercise that control with impunity. There is overwhelming evidence that Road Authorities do not value the needs of people who walk and ride - through lack of infrastructure, lack of funding and disregard of Government policies and strategies.

Road Authorities must embed transport planning in their decision making, not just traffic management

Road Authorities control every aspect of our streets including:

- Owning, managing, developing and building, operating and maintaining network assets and services.
- Licencing users and vehicles.
- Setting and enforcing minimum standards for all aspects of the system
- Funding investments in the system

Unfortunately 'building, operating and maintaining assets' is a skillset of road engineering, not transport planning. This puts the wrong people in the driver's-seat of transport funding and prioritisation.

Traffic engineers must be obliged to design and invest in roads consistent with moving the greatest number of people for the least space and by *providing access* (ie travel *within* places). Building more and more and bigger roads is not efficient, cost effective, equitable and does not fix congestion, climate or reduce road trauma.

Advocates cannot be responsible to improving the conditions of people walking and riding – the Act must make this the role of government

Community advocates play a crucial role in highlighting gaps and inequities in the transport system, pushing for safer, more accessible walking and cycling infrastructure. We amplify community concerns, providing a voice for people who walk, ride, and rely on public transport. Necessarily, community groups provide information from the 'bottom up' that complements top-down government planning.

Advocacy groups also help hold governments and agencies accountable for delivering on their commitments to road safety, sustainability, and equity. We contribute expertise, research, and real-world user experience to improve transport planning and policy.

However, responsibility for improving conditions for people walking and riding should not fall solely on advocates — this is a core government responsibility.

While advocacy groups can improve or refine well-intended projects, they have limited capacity to change to existing systems or steer funded and approved decisions. The lion's share of resources - time and money - also lie with the government. Having easier inroads to merit review, or an independent audit of transport decisions is therefore essential. The UK's Planning Inspectorate (the government's approval body) holds public hearings where objectors can address the Inspector in person.

Advocates in NSW are impeded by limited access to information, and no paths for redress. Freedom of information (GIPA) requests are expensive and difficult and obtaining action even when released information shows bureaucratic failures, misadministration or mal-adventure, prompting a rethink remains very challenging.

Action: The New Act must provide a mechanism so community advocates and local government can request decisions be reviewed where they conflict with the objects of the Act or affect a vulnerable road user, equivalent to the merit review and judicial review clauses under the EP&A Act, or the UK Planning Inspectorate.

The Roads Act should help us plan for the city we want.

The Department of Planning (DPHI) and local councils play an equally important role in managing travel demand through land use planning. With 40% of trips being local—to shops, schools, and recreation—better planning could reduce reliance on motor vehicles by ensuring key destinations are close to homes. However, roads, including footpaths and crossings, remain essential for these short trips, making improved coordination between TfNSW, DPHI, and councils critical. Despite this, the Roads Act currently grants TfNSW an effective veto over land use policies and precinct planning, limiting efforts to shape travel demand through local planning.

The Roads Act could assist DPHI and councils is by recognising the “land use authority” role in shaping travel demand through land use planning, such as by:

- identifying land use planning as a means of reducing mobility demand
- requiring transport demand **respond to local access decisions by the land use authority**, such as parking restrictions, planned or actual walking and cycling networks, mixed use (containment) and proximity of key destinations
- reversing the onus of proof for road space reallocation to supporting local access networks first (such as walking and cycling), over surface through traffic / mobility.

*Action: The New Act should **recognise the role of land use authorities** in managing roads and **give greater power** to local government authority **to make local decisions** on their local streets*

Part 3 : Issues and opportunities for people walking (and riding)

2.1 Issues for people walking

As advocates, and not decision makers, WalkSydney's submission will focus on addressing the review's objective to:

“ enable more contemporary uses for roads and streets through the Act to guide how the law applies to a range of road users, and inform a more simplified road classification system to improve road and street administration and regulation and contribute to improved road safety outcomes.”

We know it's hard sometimes to see the wood for the trees, so while the issues paper has captured many important issues, it's the behaviours of Road Authorities including TfNSW that also need to be recognised and reforms designed to address these behaviours. Road Authorities are the decision makers in the road transport system.

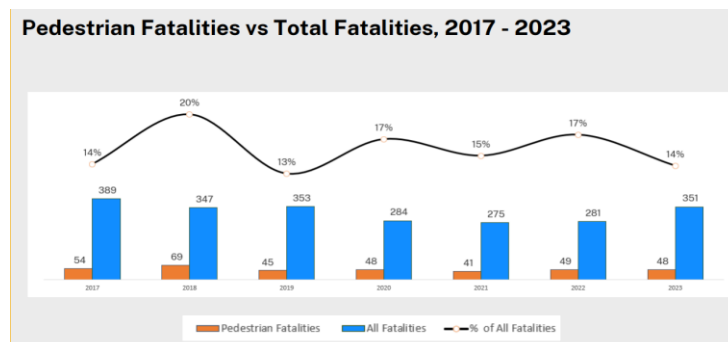
WalkSydney sees the review process as an opportunity to highlight all the issues that need to be addressed *from our perspective*. The TfNSW Review team may or may not be aware of these issues – it's our role to make these issues clear. In simplest terms the needs of people walking and riding have been largely ignored or marginalized, and while advocates can try to address these concerns, fundamentally *it is the role of Road Authorities* to meet the needs of all road users.

Each section below is written :

1. Issue: This is the problem statement, evidence, and may include an example.
2. Reform: This is the purpose of the reform, the method to achieve the reform is a matter for experts with legislative expertise. (And we expect will be debated in the coming round of the review process)

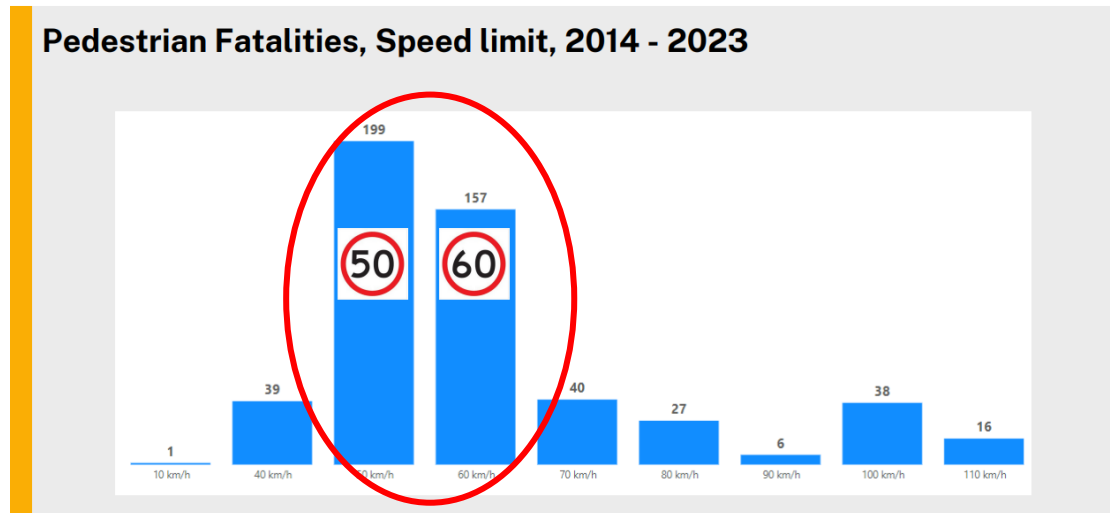
Issue 1: Road authorities in NSW have failed to make progress in reducing road trauma.

All road users, particularly those walking or riding, deserve a safe environment regardless of the road type. The Roads Act 1993 should explicitly include "safe access" in its objectives, recognizing the hierarchy of vulnerable users who require protection from cars above all else. In NSW, 340 people were killed on roads last year, including 50 pedestrians, highlighting their disproportionate risk. Despite billions invested in road trauma reduction, we have made ***no progress towards vision zero***



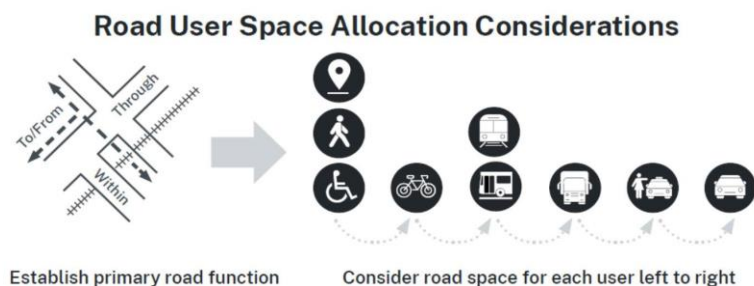
And worse – while we know what works , have consistently avoided taking action on reducing speed on roads and streets. Example: 70% of people killed walking in the past decade were killed on streets or roads with 50km/h and 60km/h speed zones.

Reducing speeds on local streets will save lives.



(Centre for Road Safety presentation, May 2024)

This is despite TfNSW having published a road user hierarchy in one of its key policies - the Road User Space Allocation Policy. Yet neither are used by TfNSW.



[Transport for NSW - Road User Space Allocation Policy and Procedure](#)

Reform 1: The Act must formalise the road user hierarchy and call out the need for a safe and comfortable environment for people walking and riding as core of the road transport system, not as an afterthought.

Reducing wait time at signals will save lives

Excessive signal wait times at TfNSW-controlled intersections force people to cross against the signal out of frustration and. Long delays discourage safe walking and create unnecessary risks, particularly for children, older adults, and people with disabilities. If TfNSW is serious about improving pedestrian safety, it must prioritize shorter wait times and ensure crossings are designed for people—not just vehicles.

Reform 2: *The Act must establish outcomes for urban streets as places, and formalise the Movement and Place process (Government policy) and the Design of Roads and Streets principles as means of achieving this. In parallel, Regulations should set upper maximum speed limits on urban streets consistent with survivable speeds and identify maximum wait times at signals for pedestrians.*

Reform 3: *The Act should mandate network planning for all transport modes, with corresponding implementation and action plans. Inconsistencies, such as missing bus and cycle networks on Victoria Road due to retained vehicle capacity, must be promptly addressed in line with both need and the Road User Space Allocation Policy hierarchy.*

Issue 2: Road Authorities must decarbonise and meet net zero targets (mitigation) and ensure safer, cooler, and more walkable streets (resilience).

Our climate is changing and we know that vehicle emissions are the second biggest contributor of carbon emissions. Decarbonising transport and encouraging more trips on foot or by bike is critical to reducing emissions and climate action. Making walking and riding more attractive means roads and streets must be safe and comfortable for people to walk.

Climate records show that the number of days over 35 degrees in Western Sydney has increased from an average 10 in the 1970s to closer to 20 in 2020. People walking to catch public transport especially children and older people cannot avoid hot streets. Climate change combined with the urban heat island effect created by extensive black asphalt streets is preventing people from walking or riding. Creating shady cool streets is part of the solution.

[Carbon budgets](#) are not part of TfNSW road expansion programs. The NSW Government has set interim targets to reduce emissions by 50% on 2005 levels by 2030, and reduce emissions by 70% on 2005 levels by 2035. These targets cannot be met unless Transport emissions are reduced, decarbonisation cannot be achieved solely through renewable energy and electrification or private vehicles. More short trips must be transitioned to walking and riding.

Councils, TfNSW and Utilities (gas water and power) are too quick to remove tree canopy to widen streets, not required to restore trees, and are also prevented even if they wanted to by road safety standards. The transport systems standards instead focus on reducing road trauma for vehicle occupants rather than providing a comfortable environment for people walking or riding.

Reform 4: *The Act must recognise the Governments net zero targets and address the transport systems climate emissions. Carbon budgets must be part of the investment assessment process and must be embedded in the Act.*

Reform 5: *The Act must include a ‘road user hierarchy’ of supporting infrastructure. The hierarchy should prioritise existing tree canopy and oblige TfNSW achieve future tree canopy targets. Communities should be provided with evidence that alternative design*

options were thoroughly investigated before trees are removed, and if trees canopy is removed it must be restored as a priority before the project is completed.

Issue 3: Road Authorities (Councils and TfNSW) do not follow their own policies, strategies and design standards.

Movement and Place is Government Policy, the Design of Roads and Streets is Government policy, the Road User Hierarchy and Road User Space allocation policy are also Government policy, despite all this TfNSW and some councils continue to neglect pedestrian needs, prioritizing vehicle movement over safe and comfortable walking. The vast majority of the road and street network is not accessible or DDA compliant for walking for older people, children, people with mobility or vision issues. TfNSW road expansion projects frequently lack crossings, force long detours, or create high-speed environments where people must risk unsafe crossings. Many high streets have too much footpath clutter making walking difficult especially for people with mobility or vision impairments.

The Review must hold road authorities accountable for pedestrian safety and comfort and oblige the road and street network to include safe, frequent, direct crossings, lowering vehicle speeds, and embedding pedestrian-first design in all projects. Without these changes, walking will remain unsafe and undervalued in NSW's transport system. There are hundreds of examples with substandard walking or riding infrastructure, a few are discussed below. The Attachment includes examples.

Reform 6: *The Act must require TfNSW to prioritise walking and cycling investment in a manner consistent with Net Zero (interim) targets including meeting its existing 'positive provision' policy for walking and cycling for all new infrastructure.*

New walking and riding infrastructure must meet minimum standards. If there is insufficient space, space for cars must be reduced or 'tested to failure' (for example, requiring speed to be reduced to enable safer narrower lanes, reversing the current onus that favours the status quo).

Reform 7: *Regulations must, like the DDA Act, require Road Authorities to cater for all road users equally, and prevent them from implementing substandard walking and riding infrastructure.*

Regulations must prevent funding of substandard infrastructure, and require funding to be reimbursed if active transport schemes are removed or compromised.

Reform 8: *The Act must empower the Minister to regulate impediments to pedestrians such as "low impact infrastructure" on footpaths.*

For example the Act / Regulations could embed minimum clear widths from the Walking Space Guide and require utilities and Councils minimise footpath clutter with supporting infrastructure hierarchy. The Transport and Infrastructure SEPP should be amended to make 'low impact' a test, rather than a category of equipment.

Reform 9: *The Act must require TfNSW conduct an audit of walking and riding infrastructure every 5 years and develop a plan to show how missing links, paths, crossings etc. will be provided and funded (either through council's delivery plans or, in the case of state roads, funded and delivered by TfNSW)*

The Welsh Active Travel Act is a good precedent for proactive planning of this kind, although lessons could be learnt from Wales to further improve on them.

Reform 10: *This review must oblige TfNSW to prepare new minimum Standards for walking and cycling infrastructure, informed by the Walking Space Guide and Cycleway Design Toolbox.*

Issue 4: TfNSW project development and investment lacks transparency and accountability

TfNSW consistently informs the community about road-widening projects and intersection upgrades as a *fete-accomplie* — well after key decisions have already been made. Public consultation has little genuine impact on people walking and riding. Instead of meaningful engagement, the process is merely a genuflection.

The issue is not unique to Australia - and in the UK this attitude was famously rebutted in *R v Borough of Brent ex parte Gunning* (the 'Gunning Principles'). These criteria for public consultations as laid out in 1985 are:

- **Gunning Principle 1:** Consultations must occur while proposals are still at a formative stage.
- **Gunning Principle 2:** Sufficient information needs to be supplied for the public to give the consultation 'intelligent consideration'.
- **Gunning Principle 3:** There needs to be an adequate time for the consultees to consider the proposal and respond.
- **Gunning Principle 4:** Conscientious consideration must be given to the consultation responses before decisions are made.

WestConnex - Even with billions, money can't be found for walking and cycling.

Key WestConnex planning conditions included on-road cycleways, the Sydney Park Junction project, and the St Peters Recreation Area. These remain unfulfilled despite the \$20 billion spent at project completion. Rozelle Parklands shared paths are substandard, and Victoria Road crossings and cycleways were not built as required.

WalkSydney is aware that TfNSW are developing a suite of new projects to support the WestConnex motorway on streets of the Inner West and City of Sydney as "Network Integration" projects. Already we see removal of pedestrian crossings from Harris St - the spine of Ultimo. Further projects are hidden from the Community. The goal seems to be to create more road space for cars, at the expense of people walking or riding.

Contrast this with the UK - even with an Active Travel Commissioner and the Office of Rail and Road as an independent '[Roads Monitor](#)', the UK Parliament still found need for even [more transparency and oversight](#) (Recommendation 6).

Reform 11: *The Act must require TfNSW and Councils identify all planned and current road projects including infrastructure that meets the needs of people walking and riding, and make this information publicly available so the Community can know where and how their money is being spent. Monitoring must identify costs and benefits and identify ‘in real time’ where benefits are reduced or costs overrun.*

The Act should also embed principles of early, genuine and meaningful engagement on roads projects - the Gunning Principles or similar.

Issue 5: TfNSW prioritises traffic efficiency investments over walking and riding, including delivering planning conditions of consent

In 2023-24, the NSW Government allocated just \$30 million to active transport, equating to \$3.61 per capita and only 0.2% of the total transport budget—far below the UN’s recommended 20% investment. This underfunding fails to meet the needs of the 40% of people who do not drive. While additional budget (such as Road Safety) could conceivably help walking and cycling, this is not spent strategically.

Road Authority budgets and investments are managed by the wrong people

This is because NSW road budgets are controlled almost exclusively by traffic engineers, not transport planners. TfNSW funds local government grants to improve conditions for people walking and riding (0.2% of the total Budget), a shamefully small allocation to support some 30% of trips. The Australian Association of Local Government report that some [30%](#) of a Councils budget is allocated to ‘transport’ but given the lack of footpaths, safe bike paths, crossing and other basic walking and riding infrastructure this typically appears to be funnelled into road asset maintenance.

Table 1 - Comparison of 2024 UK and NSW transport spending, In equivalent dollar terms TfNSW spends 3x as much on roads and 1/3rd on rail as the UK (DfT)

Uk (easy to understand)	NSW (difficult to understand - best guess*)	Conclusions
<ul style="list-style-type: none"> 12.8% and 14.6% of its transport public expenditure on national and local roads respectively (total 27.4%) 	<ul style="list-style-type: none"> 38.4% roads 41.9% (2023) 37.9 (2022) 	<ul style="list-style-type: none"> NSW spends 9-11% more on roads (NSW has half the population of the UK)
<ul style="list-style-type: none"> 58% on rail 	<ul style="list-style-type: none"> 51% rail+metro 	<ul style="list-style-type: none"> 5.5-7% less on rail
<ul style="list-style-type: none"> 4.2% on other (walking, cycling). 	<ul style="list-style-type: none"> 0.2% cycle 	<ul style="list-style-type: none"> 4% less on active transport.
<ul style="list-style-type: none"> 9.3% on local public transport (ie bus, tram) 	<ul style="list-style-type: none"> 9.6% local public transport 	

*20% unspecified projects, estimates from the 80% specified CAPEX

Reform 12: *Funding levels for walking and cycling should be subject to a equity test, to ensure funding for walking riding and public transport funds an equitable proportion of the transport infrastructure investments. (eg it is unreasonable to set the Get Active fund at a level that would take 100 years to meet councils' projected demand), and pegged less than 1%, of the total Transport budget)*

Reform 13: *The Act should provide compensation for Community via local government when TfNSW fails to meet their active or public transport planning obligations within 4 years of completing any major road project. (One forward budget estimates cycle)*

Issue 6: Local Traffic Committee is not fit for purpose and is preventing Safer, More Liveable Streets

There is a lack of clarity about the role of the Local Traffic Committee and the powers of Road Authorities, which is hindering modernization and innovation needed to make our streets safer and more liveable. Local Government is relying on the “approval” of Local Traffic Committees (LTC), despite their advisory-only role to make decisions.

NSW LTCs focus on trivial issues like parking spaces and signs, failing to address the more urgent need such as reducing speeds to prevent people being killed and injured and making streets more liveable. LTCs have no terms of reference and are not required to implement Council or TfNSW policies. Additionally, two out of the three committee members (Police and State representatives) have no technical expertise, despite the aims of the LTC being to provide technical guidance. This, combined with the “tethering” of TfNSW decision-making to council decisions, disempowers local government engineers, perpetuating the system and leading to poor outcomes for people walking and riding.

Reform 14: *Local Traffic Committees should be abolished. It is not fit for purpose and simple changes to membership, training etc will not deliver the outcomes required. Their function is better served by internal technical groups.*

If Traffic Committee is maintained, it must be modernised to address the evolving needs of local communities. The committee should be renamed the **Liveable Street Committee** or **Transport Co-ordination Group** or similar, emphasising their role is to bring together agencies, not resolve technical minutiae best left to council officers.

Terms of reference must require decisions to be aligned to strategy (eg: Councils Community Strategic Plan) and policy (the road user hierarchy and road user space allocation policy). Their objective should be ‘How can the street network be designed and managed to make it easy for people to drive less, and making walking and riding the transport mode of choice’. Decisions must not be tethered to TfNSW approval of un-delegated traffic regulatory devices.

Membership must also be reformed to reflect this, with transport planners replacing safety or traffic operations and strategic land use planners replacing the Police.

TfNSW should be obliged to inform councils (via The Liveable Streets Committee) of all plans affecting the local street network including road expansion projects, ensuring full transparency and alignment with Community Strategic Planning objectives. As with the Gunning Principles, this should be when projects are at a formative stage, with a genuine intent to collaborate and refine the projects taking account of the local community's view, before a decision is made.

The committee should be tasked with focusing on key areas such as:

- ***Walking, cycling and public transport needs*** and integration with local networks.
- ***Road trauma reduction initiatives.***
- ***Speed zoning*** to enhance safety.
- ***Aligning the function of streets*** with the strategic transport and land-use plans
- ***Expanding street tree canopy*** by reallocating road space (parking spaces and other road space) to planting trees and greening

Issue 7: Speed management and traffic regulation

One of the primary functions of a road authority is to regulate traffic **safely**. The Roads Act limits councils' ability to lower speed limits, keeping many local streets at dangerously high speeds. While the last major network-wide speed reduction occurred in the mid-1990s, further changes have been slow and inconsistent. .

[One hundred Australian academics signed](#) urged the Government to adopt an area-wide 30km/h speed limit, similar to Wales, where such measures led to a 25% reduction in road deaths within six months. Granting councils full control over speed reductions would allow for more flexible, safer, and more liveable streets, prioritizing people over vehicle speed.

Reform 15: Empower Local Government to Regulate Traffic and Reduce Speeds *The Act must delegate control of traffic regulation devices—including speed reductions (but not speed limit increases)—to local governments, with as few exceptions as possible. By allowing all road authorities to lower speed limits where needed, councils can create safer streets and improve outcomes for people walking and riding. This reform would enable a more responsive and locally driven approach to speed management, supporting safer, more liveable communities.*

Issue 8: Outdated road rules and regulatory requirements- The road rules, and the Roads Act have not been reviewed regularly causing confusion as community expectations change, and creating inconsistency with other states. The current process for road rule reviews is to wait for the Federal Government to initiate a review first, this has led to extended periods of no reviews. There should be an upper limit on the time between reviews so that road rules are examined at least every 10 years.

Reform 16: The Review must include a regulatory impact assessment and it must be enduring and binding.

2.2 Opportunities to improve outcomes for walking and riding

Opportunity 1: TfNSW goal should be to shift as many trips as possible from car trips to public transport, walking and riding.

The Review must shift the role of TfNSW beyond simply operating a “safe and efficient” road network for drivers and instead focus on reducing car dependency by shifting as many trips as possible to public transport, walking, and cycling.

Rather than continuously expanding road space for vehicles, TfNSW should prioritize investments in infrastructure and policies that make sustainable transport the easiest and most attractive choice.

A long-term solution to traffic congestion, vision zero, net zero, reducing loneliness, obesity and impacts of pollution on public health all requires reducing vehicle trips, not just managing them—this means redesigning streets, reallocating space, and supporting mode shift to create a truly integrated and sustainable transport system.

Opportunity 2: Simplify Road Governance with two Acts (like in the UK)

Recognizing the distinct needs of urban and rural roads can streamline governance and improve outcomes. Urban roads serve diverse users in complex environments, while rural roads primarily support vehicle travel with fewer non-vehicle users.

Creating two separate acts—a Highways Act for rural roads and an Urban Roads and Healthy Streets Act—for urban roads in our big cities, centers, regional towns and rural villages. By separating these two distinct groups of roads (and streets), the two Act can serve each better rather than needing to be high level to serve both.

Note: When Transport for London was set up in 2000, *all* roads within the M25 were devolved to the urban agency, including motorways like the A13. The devolution of all roads has been essential in getting consistency between the ‘red routes’ (urban highways) and surrounding land use policies, including implementing a strategic cycleway network and lowering speed 20mph (30km/h), policies which Highways England struggle to implement.

- **The Highways Act** could focus on freight and inter-regional travel *between* towns.
- **The Urban Roads and Healthy Streets Act** could focus on accessibility using the road user hierarchy, place-making using the road user space allocation policy, net zero, green healthy active streets with the goal is to get people out of cars for as many trips as possible.

Opportunity 3: Establish a UK-Style Active Transport Commissioner for NSW

New South Wales needs a dedicated, high-level leadership role to champion walking, cycling, and active transport—similar to the **UK’s Active Travel Commissioner** model. By establishing an **Active Transport Commissioner for NSW**, the state can ensure stronger coordination, accountability, and progress toward safe, people-friendly streets.

Role & Responsibilities - The **NSW Active Transport Commissioner** would:

- Provide independent advocacy for walking, cycling, and public space improvements.
- Ensure active transport is embedded in planning and infrastructure decisions at all levels.
- Drive the implementation of Vision Zero, prioritizing safety and accessibility.

- Oversee funding strategies to support active transport projects.
- Hold agencies accountable for delivering a connected and inclusive transport network.

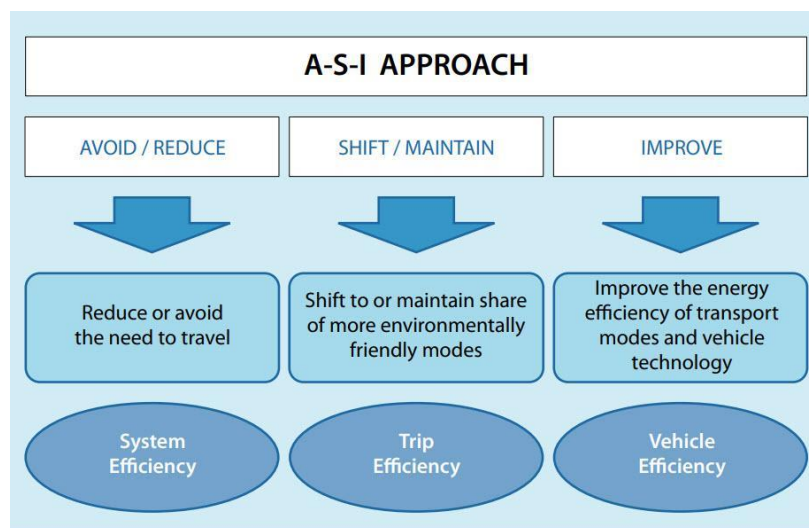
Governance & Structure - The Commissioner would be an independent statutory role reporting directly to the **Minister for Transport**. This position would have the authority to advise on policy, review infrastructure plans, and work across agencies to ensure active transport is prioritized in urban and regional planning. The Commissioner would have a dedicated infrastructure budget – ideally 20% of the overall transport budget.

Expected Outcomes

- Increased walking and cycling participation.
- Safer streets with better infrastructure.
- More efficient integration of active transport with public transport.
- Stronger alignment with **Vision Zero and net-zero emissions targets**

Opportunity 4: Adopt a future road building test – like Wales

Wales has adopted a series of [future road building tests](#) which ensure new roads make better use (or ‘sweat’) existing assets first, and are consistent with a trajectory to Net Zero. The [A/S/I \(avoid, shift, improve\) framework](#) is an established method of approaching resilience, as the least climate impactful decision is typically the decision **not** to build.



[Sustainable Urban Transport Project - The Avoid-Shift-Improve \(ASI\) approach](#)

Opportunity 4: Integrating a Digital Layer into the Roads Act

The data layer of roads is increasingly crucial for both road users and decision-makers. However, many key datasets are unregulated, including:

- Real-time traffic data for journey planning.
- Wayfinding information, such as road signage text used in navigation apps.
- Zoned speed limits and actual speeds (50th and 85th percentile) measured for traffic safety projects.

- User counts (vehicles, cyclists, pedestrians) for infrastructure planning.

A key opportunity lies in standardising and systematizing this information. Currently, wayfinding signage on state roads often differs from digital navigation apps, and cars misinterpret speed limits due to issues like reading advisory signs incorrectly. The Roads Act should empower a state agency (TfNSW or DCS) to collect and distribute real-time road data as Open Data, enabling third-party use.

Longer Term - Beyond standardisation, managing road data properly could:

- Preserve and utilize traffic data: NSW spends \$12M annually on traffic counts, yet most data is discarded after projects end. A historical database could improve traffic, pedestrian, and cycling flow models.
- Improve signal timing: Current manual adjustments to traffic signals make real-time improvements difficult. Open data could allow innovation and facilitate optimization, benefiting new projects, housing, and walking speeds.
- Optimize major roads dynamically: For example, dynamically assigning motorway lanes based on destination to reduce dangerous lane-switching.

Safety - Existing technology could be leveraged to improve pedestrian safety, such as:

- Enforcing speed limits digitally: Cars could be limited to posted speed zones (e.g., 30km/h trial areas, school zones) using cruise control or speed governors.
- Preventing rat-running: Local Area Traffic Management (LATM) zones could be restricted digitally to vehicles who identify an origin or destination in the area.
- Dynamic speed and signal management:
- Lowering speeds in night-time economy areas (6 PM–6 AM) to reduce injuries.
- Real-time signal adjustments in high-pedestrian areas like Elizabeth St, Surry Hills, to balance vehicle and pedestrian movements efficiently.

Opportunity 5: Create a process to restrict reinstating vehicle access to any lane, road or street closed to cars for more than 12 months

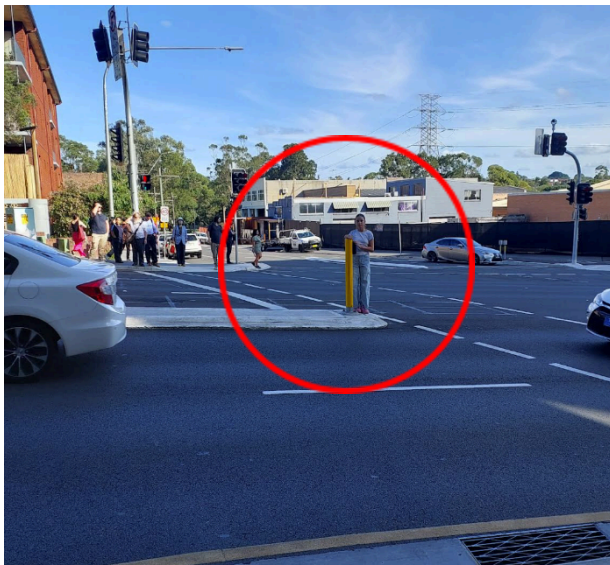
There are many instances where roads and streets are closed to traffic for extended periods to address utility, development or traffic regulatory issues. The Review should consider how it can shift the requirement to reinstate vehicle access if a street has been restricted for 12 months, to continuing to restrict access.

Likewise traffic performance around individual lanes that have been closed to general traffic for over 12 months (for example, to facilitate construction) should be reviewed with a presumption in favour of making the lane removal permanent (ie. painted out) to facilitate permanent reallocation to other modes. For example Lilyfield Road, Rozelle was closed for an extended period and ‘investigated’ for closure at Victoria Road in 2020 but no action taken. This is just one example of a lost opportunity to enhance walking and cycling.

Examples Attachment - WalkSydney Submission

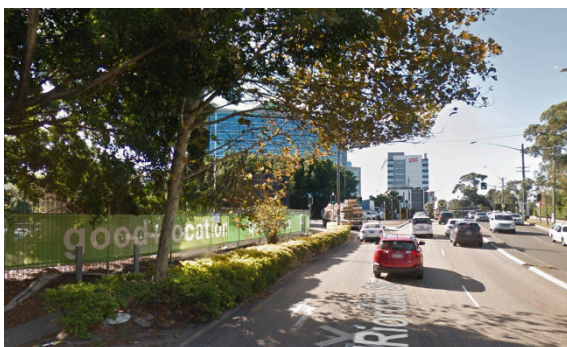
Example 2.1 : TfNSW enables automatic signal phasing a multiple locations across Greater Sydney during COVID so people would have shorter wait times. Without any consultation or notification this benefit was switched off 12 months after the end of COVID. TfNSW prioritised vehicle speeds and volumes over wait times for people crossing streets.

Example 2.2 : Canterbury Road 5 pm, 19 Feb 2025 - see below. A teenager stands waiting in the middle of a five lane 60km/h road standing next to a beg button. The minimum wait time to cross is 3 minutes. Best practice is a 60 second wait, a 180 second wait is unsafe.



Example 2.3 - Removing trees to create space for cars that lead to a hostile walking environment: TfNSW road widening at O'Riordan street near Mascot Station improved capacity for cars, making a partially cool and shady road hostile and uncomfortable for the hundreds of people who walk to the airport to avoid the rail surcharge. *And when finished 5 years later TfNSW have not replaced a single tree.*

O'Riordan Street 2015



O'Riordan Street 2019





O'Riordan Street 2023

Example 2.4 – Achieving net zero and carbon budgets : The NSW

Government-commissioned [toll](#) review that proposes establishing a toll collection agency is estimated to cost the NSW [Government \\$95 billion](#). Carbon budgets were not considered as a part of this proposal but this subsidy will induce demand for driving undermining achieving the governments climate emissions reduction goals. The Governments tolling review solutions are inconsistent with net zero, and carbon emissions reduction.

Example 3.1: [Henry Lawson Drive Upgrade Stage 1A](#) (project update at 2March 2025)

The final design for TfNSW's Henry Lawson Drive upgrade fails to provide safe pedestrian crossings. The new Keys Parade roundabout lacks pedestrian crossings, most cross streets are missing crossings, and the Bullecourt Street intersection only includes a painted at-grade crossing—forcing pedestrians to navigate a 60km/h two-lane slip lane. Rather than prioritizing separated walking and cycling paths, the design relies on shared paths to maintain 70km/h road lanes, making the corridor unsafe for children, older adults, and people with disabilities. This approach disregards TfNSW's Cycleway Toolbox and Road User Space Allocation Policy, failing to deliver safe, accessible, and inclusive transport infrastructure.

Example 3.2: [Road Safety Upgrade a Beamish Street and Brighton Avenue – Campsie](#) (July 2023)

Canterbury-Bankstown Council applied for funding to install a pedestrian refuge on Beamish Street, aligning with its strategic vision for a "moving and integrated" city. However, Beamish Street, located within 200m of the new Campsie Metro, remains a 50km/h zone, and the proposed refuge offers only a minor improvement compared to a raised crossing. The design prioritizes vehicle flow over pedestrian safety, as it does not slow cars. Additionally, the nearest DDA-compliant crossing is 200m away, forcing people to take an extra six-minute round trip just to cross the street safely.

Example 3.3: [King Street Cycleway Sydney CBD](#)



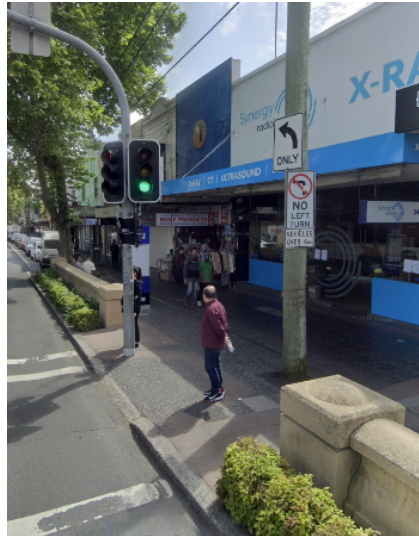
TfNSW is constructing the King Street cycleway in the CBD, but the final design falls short of safety and usability standards. While the artist's impression suggests a wide cycleway allowing side-by-side riding, the actual width will be just 2.18m—22cm narrower than TfNSW's own Cycleway Toolbox minimum standard.

This cycleway is expected to be one of the busiest in NSW, potentially Australia, yet TfNSW has chosen to build it below minimum design requirements. This decision fails to comply with:

- **TfNSW Road User Space Allocation Policy**, which should prioritize people and bikes over cars.
- **Cycleway Toolbox minimum width requirements**, ensuring safe and accessible cycling infrastructure.
- **Safe System principles**, which are essential to protecting vulnerable road users.

By building critical cycling infrastructure below minimum standards, TfNSW risks creating a high-demand route that does not safely accommodate the people.

Example 3.4 – Footpath clutter: Road Authorities and utilities use footpaths to store assets obstructing footpaths with sign and utility poles, utility boxes, bins and seats.



Beamish St , Campsie

Example 3.5 Footpath comfort – TfNSW Walking space guide not Fruin

TfNSW Walking Space Guide is NSW Government policy, its purpose is to estimate a footpath that will provide a comfortable walking space width for the volume of people on the footpath. Sydney Metro have consistently rejected the Walking Space guide methodology instead choosing a Fruin Methodology. This results in inadequate and unsafe provision of footpath spaces around Metro Stations.

Example 4.2 : Western Distributor motorway expansion program (not part of any government strategy) removed a pedestrian crossing at Allen and Harris Street that allowed 750 people in the peak hour to cross safely so that more cars could exit the Western Distributor faster.

Example 6.1 : TfNSW will not approve shared zones on local streets unless they meet specific technical directions, because TfNSW controls the installation of speed signs. Local Government engineers need to seek TfNSW exemption to install a shared zone if the streets does not meet certain criteria. This constant need to seek TfNSW approval does not support local decision making, and the nature of decision is so trivial its not clear why approval is required.