



Victoria Walks Inc.
Level 8, 225 Bourke Street
Melbourne VIC 3000
P: 03 9662 3975
E: info@victoriawalks.org.au
www.victoriawalks.org.au
Registration No. A0052693U

Plan Victoria Team
Department of Transport and Planning
1 Spring Street
Melbourne
VIC 3000

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Submission – Plan Victoria

Executive summary

Victoria Walks supports the general direction set in the discussion paper *Big Ideas for Victoria's Future* and many of the specific elements suggested.

The Victorian Government has a target to increase active transport mode share from 18 to 25%, but there has been no real sign of increased investment to deliver this target. Responsibility for walking and pedestrian infrastructure tends to be left to local councils, with widely varying priorities and levels of funding, expertise and staff capacity. If the full benefits of delivering housing within potential walking distance of destinations are to be realised, it needs to be paired with policy and investment to deliver more walkable neighbourhoods.

To maximise the cost-effectiveness of urban greening, it is particularly important to target tree planting to places that are likely to provide direct shade to people, protecting them from heat and harmful UV.

Activity centres are the heart of local suburbs and towns. In the middle and outer suburbs of Melbourne, people are 3.5 times more likely to walk to mainstreet style activity centres than centres dominated by car parking. However, the Victoria Planning Provisions require large areas of off-street car parking in activity centres.

Reducing the amount of commercial parking required and stricter provisions for the way it is designed will be critical to delivering “thriving and liveable suburbs and towns.” Victoria Walks also supports reduction in car parking requirements for residential development.

Housing development in regional towns and cities appears to be ‘one size fits all’ with a conventional model of development based on subdivision of land on the urban fringe. There is a need to promote infill housing in areas within easy walking distance of key destinations in regional towns and cities.

Recommendations

Plan Victoria should include the following actions (or similar):

1. Investigate mechanisms to promote medium density infill development, including apartments, within 800m of regional town and city centres and other major destinations such as university campuses.
2. Commit to street design and investment in walking infrastructure to support walking in areas for residential intensification. Investment in walking should be publicly reported. In line with United Nations best practice recommendations, the Policy should commit to a medium-term goal of dedicating 20% of Victoria's transport budget to active travel. At least half of this should be allocated to walking.
3. Invest in walking infrastructure around railway stations, tram stops and bus stops that have high frequency services.
4. Set travel mode share targets for increased walking, cycling and public transport (potentially including specific targets for trains, trams and buses).
5. Set targets for a reduction in private vehicle mode share, vehicle ownership and/or total travel.
6. Urban greening targets should prioritise tree planting that provides shade to footpaths, bike lanes and bus stops without shelters, and walking and/or cycling paths in open space areas.
7. Investigate options to encourage provision of supermarkets and fresh food outlets in a higher proportion of activity centres.
8. Investigate options to encourage more timely development of supermarkets and fresh food outlets in growth areas.
9. Remove all minimum car parking requirements, other than accessible parking for people with disabilities and parking for loading purposes; or alternatively, develop a car parking system to:
 - a. Reduce required car parking rates for commercial land uses, especially for development in and around activity centres.
 - b. Remove all minimum car parking requirements for bars and hotels (except perhaps for hotel accommodation).
 - c. Control the design of commercial car parking areas to minimise adverse effects on urban amenity:
 - i. Avoid constructing new surface level off-street car parks (preferencing parking underground or incorporated into buildings)
 - ii. If new at-grade car parking is necessary for some reason, position it in smaller areas to the side or rear of shops; provide trees for shade and amenity; and use surface materials that minimise heat absorption.

Detailed submission

Walking has a multitude of benefits that make increased walking a vital objective of any planning strategy. For people who walk, there are many benefits to their physical and mental health. And there are many social, economic and environmental benefits to society from increased walking.

Victoria Walks supports the general direction set in the publicly released discussion paper *Big Ideas for Victoria's Future* (hereafter referred to as 'the discussion paper'). We also support many of the specific elements suggested, as outlined below.

Our submission seeks to identify key planning problems and solutions that would help realise the vision outlined in the discussion paper.

We have organised this submission in line with the themes set out in *Big Ideas for Victoria's Future*.

Affordable housing and choice

One of the Big Ideas in the discussion paper is “more homes in locations with great public transport access.”

Victoria Walks supports this aspiration and notes that the discussion paper also talks about prioritising homes close to services and shops. This is an important additional aspect – people will happily walk to local shops and services if they are within reasonable proximity. On average, 20% of trips to shops and services in Melbourne are walked (see Figure 1). This proportion is much higher for short trips or inner suburbs.

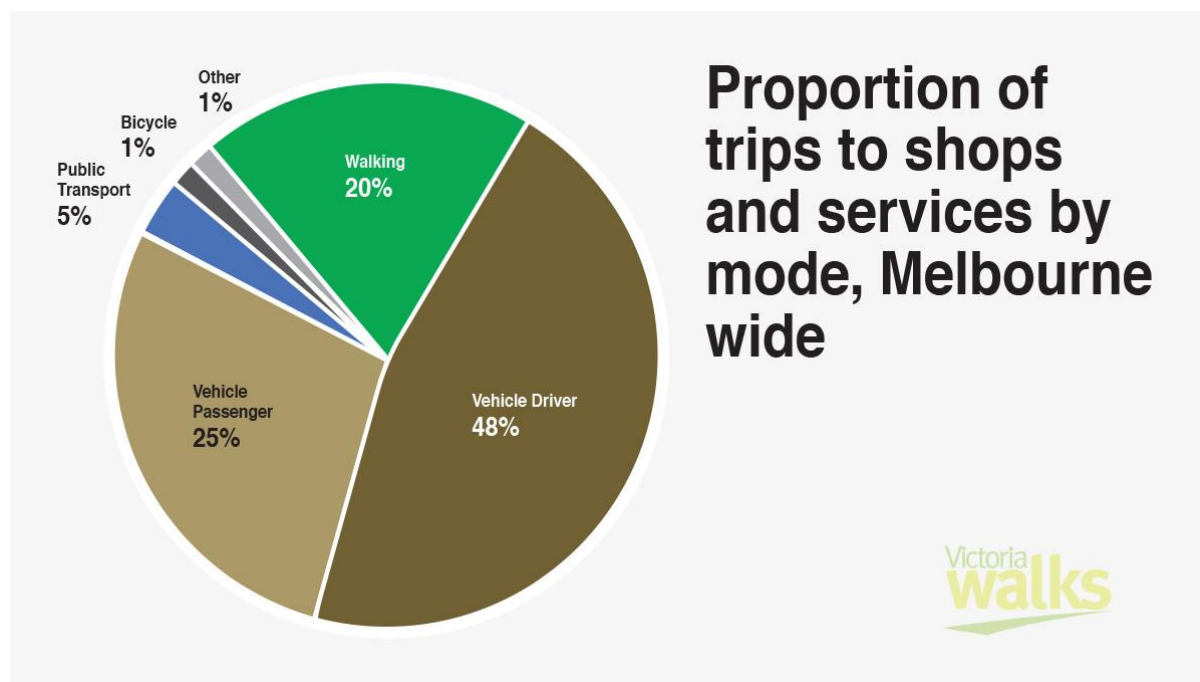


Figure 1 - Proportion of trips to typical activity centre shops and services, Melbourne ((Eady & Burtt, 2019)

The discussion paper suggests that “a new plan for Victoria could:

Provide clear guidance about where more homes will go, including around transport hubs and closer to regional towns.”

It is important to broaden this to include more homes around activity centres.

We support the suggestion that a new plan for Victoria could “update regulations to improve the design quality of apartments, including consideration for climate resilient design.”

Particular issues for walkability in apartment design include:

- Providing passive surveillance and an engaging interface with the street, especially at ground level.
- Providing pedestrian connections through development sites, where possible (especially for larger developments).

Victoria Walks supports the suggestion that a new plan for Victoria could:

“Require fewer car spaces for developments close to public transport to reduce costs and make homes more affordable.”

In addition to simply requiring fewer spaces, Plan Victoria should consider mechanisms to make the car parking that is provided more efficient. This might include decoupling ownership of apartments from ownership of a particular car space (so car parking is transparent as an additional cost) or providing parking for carshare.

However, in terms of encouraging walking, it is more important to require fewer car spaces in commercial development rather than residential buildings (discussed later in this submission).

Regional communities

The discussion paper notes:

“In regional Victoria, we heard that there is a need for more new homes in a range of different styles to suit people’s needs across all stages of life.”

This correlates with our observation that housing development in regional towns and cities appears to be ‘one size fits all’ with a conventional model of development based on subdivision of land on the urban fringe. This has a range of problems, including that these areas generally have comparatively poor access to services within walking distance, reinforcing dependence on private vehicles.

Higher density infill development such as townhouses and apartments appears uncommon in regional cities and towns. This may reflect perceptions of risk by developers, investors and banks, but it may be possible to better facilitate this type of development through the planning system. It would be important to target mechanisms to promote infill to areas within easy walking distance (around 800m) of regional town and city centres and other major destinations such as university campuses. If a blanket approach to infill was adopted across regional urban

areas, development would be largely driven by the location of available land for development or redevelopment.

Plan Victoria should anticipate mechanisms to promote medium density infill development, including apartments, within 800m of regional town and city centres and other major destinations such as university campuses.

Equity and jobs

Victoria Walks supports the aspiration to enhance public transport options and make walking and cycling more attractive, and change behaviours around car dependency.

Aligning housing density with street design and investment

Providing housing in close proximity to destinations, as the planning system generally seeks to do, is fundamental to making walking more attractive. However, this is not necessarily backed up by measures to ensure that street design in and around these centres makes walking convenient, safe and attractive.

Responsibility for walking and pedestrian infrastructure tends to be left to local councils, even though the most significant walking barriers are often arterial roads managed by the state. Councils have widely varying priorities and levels of funding, expertise and staff capacity. Existing walking infrastructure also varies widely. Regional communities are generally disadvantaged on both these counts – notably with fewer existing streets having footpaths and less resources to address that problem.

The latent demand for government investment in walking is significant. In Victoria, many walking projects are ‘shovel ready’ and only require funding to go ahead, demonstrating a base level of need for walking investment. In March 2022, Victoria Walks surveyed local councils to indicate the walking projects they had planned and costed but lacked funding. A total of 39 (half the councils in Victoria) and two water authorities put forward 522 projects worth \$469 million (Victoria Walks 2022). Additionally, an earlier survey by the Municipal Association of Victoria found that for 83% of councils, funding was a barrier to delivering walking and cycling projects (MAV 2021).

The state has generally been reluctant to address this funding shortfall. There has been some limited investment in walking infrastructure, mainly through TAC, but generally councils are left to support walking on their own. However, the state generally bears the eventual cost of inadequate walking infrastructure, primarily through increased health costs.

While Governments over many years have invested in public transport and supporting private vehicles through roads, for the most part the funding has not found its way to walking and/or bicycle riding.

The Victorian Government has a target “to increase the active transport mode share from 18 per cent in 2021 to 25 per cent in 2030,” as an emissions reduction pledge (State of Victoria 2021). However, there has been no real sign of increased investment to deliver this target in the three years since it was set.

This situation is a far cry from the investment recommended by the United Nations (UN). The *Global Outlook on Walking and Cycling*, with analysis of sample cities in Africa and Asia, recommended that 20% of total transport budgets should be directed to non-motorised transport “at national and city level” (UNEP 2016: 36).

Government should increase investment in walking and report on the level of investment over time.

Walking and public transport

Recognising the relationship between active travel and public transport is crucial. Most public transport trips involve a substantial walking component (Loader 2013), making the integration of these modes essential for replacing longer private vehicle journeys with more sustainable alternatives.

Walking is particularly important for accessing bus and tram stops, with analysis finding that in Melbourne 94% of trips from home to tram or bus stops are walked (Eady and Burt, 2019). Despite free parking at many suburban train stations, about half of people walk from home to the station. When trips to train stations from all locations (including from workplaces) are considered, two thirds of trips accessing the train system are walked (see Figure 2).

Research found that over half of people say they don’t use public transport because there is none available, or it doesn’t operate at a convenient time. Improving public transport has the potential to significantly reduce the number of vehicle trips, with only 10% of people requiring their own vehicle for work and 8% using it to carry work items or other people (McCrimdale Research 2014).

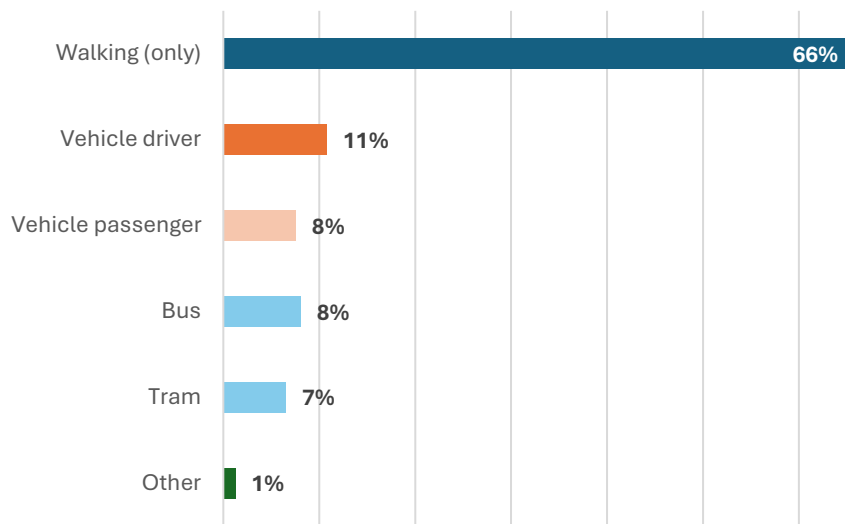


Figure 2 - Trips by mode to the train station: blue = trips involving some walking (Eady and Burt, 2019)

Reliable and accessible public transport promotes walking to public transport stops, while well-designed walking routes to public transport hubs increase the attractiveness of public transport. Strategic investment aimed at enhancing the symbiotic relationship between walking and public transport will be pivotal in delivering modal shift towards more sustainable transportation choices.

This relationship further affirms the need for investment in walking infrastructure around railway stations, tram stops and bus stops that have high frequency services.

More specifically, Victoria Walks supports the suggestion in the discussion paper that a new plan for Victoria could “improve the bus network to enhance reliability, safety and connectivity to key destinations.”

It is also important to provide bus users with safe access to bus stops. Victoria Walks has undertaken detailed research on walking access to bus stops (Eady and Burt 2021). Bus stops are typically located on main roads to facilitate bus operation, but this usually leaves customers to negotiate the crossing of a road with high traffic volume and speeds. Two in five audited stops (41%) were located on roads where a person would have to cross at least four lanes of traffic and sometimes also parking lanes. Despite these challenges, pedestrian crossings are not generally provided at bus stops.

Mode share targets

Plan Victoria should establish targets to meet and measure its objectives.

As noted above, there is an existing target to increase active transport mode share. Victoria Walks recommends setting targets specific to both walking and cycling separately.

We are not aware of an existing mode share target for public transport. Targets should be considered for individual public transport mode share – train, bus and tram.

Plan Victoria should also set targets for a reduction in driving mode share. This should include a target to reduce the kilometres travelled by car per person. The Welsh Government has set a target to reduce miles travelled by 10% (Welsh Government 2021).

For Plan Victoria to meet its objectives it should also have targets to reduce the number of vehicles owned per person or household.

Transport equity

It is important to recognise that many people cannot or do not own a car, and the ramifications of that.

Vehicle ownership is not universal in Australia – at the 2021 Australian census, there were 673,969 households that did not own a car (ABS 2021). Cost, disability, age and cultural factors can all influence vehicle ownership. Additionally, the costs of owning and maintaining a car can be prohibitive or take up an extremely significant portion of household budget.

Aside from owning a car, users must hold a driver’s license or have someone to drive them, which requires a time investment. Over a quarter of the population doesn’t have a license, including about 30% of people aged over 75 (BITRE 2017). Many people are excluded from getting a license as a result of age or disability. Given the prevalence of car dependent design, and the substantial portion of the population unable to drive, there is a pressing need for urban policies to prioritise alternative transportation options that are accessible to all citizens.

Research has shown that not having access to a car can exacerbate social isolation and exclusion, particularly in areas with limited transport and service options. This situation disproportionately affects segments of society that are also disadvantaged in other ways. Providing more walkable neighbourhoods, including better access to high quality public transport, will help improve social equity and reduce loneliness and isolation in the community.

Thriving and liveable suburbs and towns

Victoria Walks supports the following suggestions in the discussion paper:

“Ensure developers provide local community infrastructure alongside new housing.

Better coordinate new development with the delivery of infrastructure.

Introduce a minimum standard to guide the delivery of quality public open and community spaces for everyone to enjoy.”

These measures are likely to provide more attractive destinations for people in their local community. They may choose to walk to those destinations, whereas they will not walk to destinations further away in other suburbs.

Higher quality open space is likely to encourage recreational walking.

Urban greening

Victoria Walks supports the aspirations for “more trees and urban greening in our parks and community spaces” to “make our streets cooler and greener” and the suggestion of “targets to increase tree canopy coverage.”

To maximise the cost-effectiveness of urban greening, it is particularly important to target tree planting to places where they are likely to provide direct shade to people, in addition to broader greening benefits. In the street environment tree planting should be designed to provide shade to footpaths, bike lanes and bus stops without shelters. In open space areas, planting should be designed to provide shade to walking and/or cycling paths.

Street trees have a broad range of benefits and are important in creating an environment that people want to walk in. The benefits for walkers are both aesthetic and practical, with street trees providing shelter from the sun, including harmful UV rays. They also provide some shelter from rain.

Most significantly, tree canopies can reduce the temperatures of the surfaces they shade by 10-25°C (Heart Foundation 2013).

Provision of utilities in the road reserve can be a significant obstacle to the practical provision of street trees. Government should take a co-ordinating role to minimise the impact of utilities on street trees (and footpath surfaces).

Along arterial roads VicRoads/DTP have been an obstacle to the provision of trees, focusing on the perceived safety risks to vehicle occupants. These risks are contentious and there is some evidence to suggest that drivers respond to the perceived risk by reducing speed, meaning streets with trees may in fact be safer for drivers (Naderi, Kweon and Maghelal 2008). In addition, trees planted along the kerb define a pedestrian zone separated from traffic, providing both real and perceived safety benefits for people walking.

Providing shade over walking paths and minimising urban heat more generally will be increasingly important to maintain summer walking as climate change leads to hotter weather.

It will therefore be important to ensure urban greening targets encourage greening where it will have the most benefit. If the targets are only for general urban greening, the risk is that greening will be directed to the locations where it is easiest to plant trees and maintenance costs are low – most likely less utilised areas of public parks where they will not interact with (and potentially compromise) built infrastructure.

Targets for urban greening should apply to existing streets as well as streets in new subdivisions.

Access to daily needs

Convenient access to fresh, healthy food and daily needs within walking distance is a fundamental requirement of 20 Minute Neighbourhoods or thriving and liveable suburbs and towns. However, this is not necessarily a reality in existing suburbs. Victoria Walks has audited around 20 suburban activity centres in Melbourne for walkability and many of the smaller centres do not have a supermarket or a range of fresh food and grocery shops. They usually have a convenience store, but this limits the range of food available and prices are comparatively high.

In the growth areas the issues are different again. Even if activity centres are appropriately designed into new suburbs, ensuring that shops and services are provided in a timely way that aligns with residential development is a significant challenge. The risk is that the housing is developed first and the shops are provided later, when the residential areas are close to full build out and provide local demand for the shops. This has at least two major problems:

- During the build out, which may take many years, any residents without access to a car (including stay at home primary carers) are stranded without access to fresh food
- By the time shops are developed, most residents have developed a habit of shopping elsewhere, in car-dependent trips. These habits may change when local shops are available, but not necessarily.

Solutions to these issues are not straightforward, but the Government should seek to investigate and address them if broader planning objectives are to be met.

Activity centre design

Activity centres are the heart of local suburbs and towns. We note that one of the top 5 factors to help live a more sustainable lifestyle identified in public consultation is “pedestrian friendly urban centres.”

There are many aspects of activity centre design that impact on amenity and walkability, however the pivotal elements are:

1. Land ownership and associated design – central control and a shopping mall approach vs a street-oriented design usually associated with fragmented land ownership.
2. The approach to car parking.

These factors typically combine to produce one of two activity centre types (although there can be elements of both):

In 2019, Victoria Walks undertook research on [Walking and Transport in Melbourne Suburbs](#). This work outlines the role of walking in the broader transport system and particularly for access to activity centres and public transport.

To better understand travel to centres in the middle and outer suburbs, the research compared a group of mainstreet style strip shopping centres with 'car-oriented' centres of a similar size and similar distance to the CBD. The mainstreet style centres typically have individual shops and businesses directly fronting the street. Car parking is largely provided on the street, sometimes supplemented by small areas of additional off-street parking. The car-oriented centres typically involve an internally oriented shopping mall surrounded by large areas of off-street car parking.

The results, set out in Figure 3 below, confirm that the design of centres has a strong influence on how people travel to them.

The proportion of walking trips to mainstreet style centres was 3.5 times that of the car parking dominated centres. They also had higher rates of cycling and public transport access, although the latter probably reflects better provision of public transport for the mainstreet centres, more than urban design. Overall, 73% of trips to the mainstreet style centres were made by private vehicle – a high proportion – but almost *all* trips to the shopping malls (92%) were by car.

Mode of travel	Strip shopping centres	Car-oriented shopping centres
Walking	21%	6%
Vehicle Driver	52%	60%
Vehicle Passenger	21%	32%
Bus	2%	1%
Train	3%	0%
Bicycle	1%	0%
Other	1%	0%
TOTAL number of centres	10	12
TOTAL recorded trips	504	545
Average trip distance (km)	3.7	5.0

Figure 3 – Mode of travel to similar-sized activity centres in middle and outer suburbs of Melbourne (Eady & Burt, 2019)

Commercial car parking requirements

Related to the issues above, commercial car parking requirements are a key driver of urban form in activity centres. Where there are a number of shops and businesses, the Planning Scheme requires large areas of off-street car parking. The amount of car parking required is usually well in excess of what is actually needed.

Large off-street car parking areas have a direct adverse impact on walking. These include:

- Impacts on walking amenity – large car parks are generally unattractive, often without large trees to provide shade in an environment prone to over-heating due to large areas of asphalt. Pedestrian paths through the car park may not be provided, leaving people to walk amongst moving vehicles.
- Psychological effects – large car parking areas send a message ‘this is a place to drive to’ and may feel hostile to walkers due to the issues above.
- Separation of activities – large car parks create physical distance between destinations which may discourage people from walking and encourage people to drive between shops within the same centre.

The analysis described above demonstrates that these factors do influence travel behaviour, with large amount of car parking encouraging driving and discouraging other transport modes in a Melbourne context.

These findings are consistent with the broader international research literature which confirms that provision of free car parking is one of the most important factors in encouraging driving (Krizek, Forsyth and Baum 2009; Donovan & Munro 2013).

A particular example of the inappropriateness of existing provisions is the requirement for alcohol venues to provide car parking. Victoria Walks promotes road safety and as such we strongly oppose continued minimum car parking requirements for bars and hotels. Considered from a broader policy perspective, encouraging driving to alcohol venues can only be seen as counter-productive. Restaurants, hotels and bars are also the land uses people are most likely to walk to – accounting for more than half of trips if they are within 2km. In total, less than a third of trips to a pub or bar are driven and require a car park, although a substantial proportion of people travel as vehicle passengers (Eady and Burtt 2019).

Overall, there is therefore a need to:

1. Significantly reduce, if not eliminate altogether, the amount of car parking required by the Planning Scheme. Apart from perhaps accessible car parking, it is not at all clear that government needs to regulate to provide more car parking than the market demands.
2. Control the design of commercial car parking areas to minimise adverse effects on urban amenity:
 - a. Avoid constructing new surface level off-street car parks (preferencing parking underground or incorporated into buildings)
 - b. If new at-grade car parking is necessary for some reason, position it in smaller areas to the side or rear of shops; provide trees for shade and amenity; and use surface materials that minimise heat absorption.

Victoria Walks would be happy to work with the Department to further discuss the recommendations in this document.

Victoria Walks gives permission for this submission to be made public.

If you have any queries regarding this submission please contact Duane Burtt, Principal Policy Advisor, on dburtt@victoriawalks.org.au or 9662 3975.

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