



6 August 2024

Dr Ian Porter  
First Assistant Secretary, Data, Research, Strategy and Net Zero  
Department of Infrastructure, Transport, Regional Development,  
Communication and the Arts

By email: [NetZero@infrastructure.gov.au](mailto:NetZero@infrastructure.gov.au)

Dear Dr Porter

### Submission: Transport and Infrastructure Net Zero Consultation Roadmap

The National Growth Areas Alliance (NGAA) welcomes the Australian Government's *Transport and Infrastructure Net Zero Consultation Roadmap* (the Consultation Roadmap) and the opportunity to provide feedback on the potential pathways for this sector to support economy-wide net zero carbon emissions by 2050, as well as actions or policies the Australian Government will need to take to support these potential pathways.

The NGAA is the peak body for local governments in Australia's outer metropolitan growth areas and advocates to state and federal governments on growth area challenges and opportunities. Together, we represent more than five million people living in Australia's fast-growing suburbs and are united by shared experiences of population growth rates at double the national average and long-term under-investment in vital infrastructure.

Geographically, Australia's growth areas are located on the edge of Australia's major cities and were designated for future urban growth when they were established up to twenty years ago. These areas now comprise established urban centres and urban areas under development, as well as regional townships and agricultural land. Indeed, some of the NGAA Member Councils straddle the metropolitan and regional boundary.

We take an evidence-based approach, with a Policy Platform built on the foundations of our comprehensive research strategy. We also help to develop Alliance Councils' capacity to deliver good growth through best practice case studies, policy discussions, and extensive networks.

#### NGAA Member Councils

##### NSW

- [Blacktown City Council](#)
- [Camden Council](#)
- [Campbelltown City Council](#)
- [Penrith City Council](#)

##### Victoria

- [City of Casey](#)
- [Cardinia Shire Council](#)
- [Mitchell Shire Council](#)
- [Wyndham City Council](#)
- [City of Melton](#)

##### Western Australia

- [City of Wanneroo](#)
- [City of Swan](#)
- [City of Cockburn](#)
- [City of Kwinana](#)
- [City of Armadale](#)
- [City of Gosnells](#)

##### South Australia

- [Mount Barker District Council](#)
- [City of Playford](#)

- Wollondilly Shire Council
- Hume City Council
- City of Whittlesea
- Shire of Serpentine Jarrahdale

### Adopting an equitable approach to decarbonisation can deliver multiple benefits

The NGAA broadly agrees with the proposed five guiding principles outlined in the Consultation Roadmap (maximise emissions reduction; value for money; maximise economic opportunity; inclusive and equitable; and evidence-based) that will be used to guide the development of the final Roadmap and Action Plan. The NGAA would like to stress, however, that when applying the principle of ‘value for money’, it is important to consider the wider economic, social and environmental benefits that may be achieved over the long term from actions that may require more funding upfront in the short term.

The recommendations outlined in this NGAA Submission to the *Transport and Infrastructure Net Zero Consultation Roadmap* place greater emphasis on the need to better integrate transport networks and systems with land use planning and coordinate investment across tiers of government than on improving the technology or efficiency of each transport mode. This is because there are multiple co-benefits for communities that come with enabling a greater uptake of public and active transport options for local travel with safe, active transport infrastructure including reducing emissions, congestion and the cost of living, improving air quality and road safety and increasing levels of physical activity<sup>1</sup>. These co-benefits should be considered when applying the value for money principle to policy options.

What constitutes value for money is especially important when considering what role the government may take when adopting actions towards decarbonisation (see Consultation Roadmap, Table 2, page 16). For example, it may seem ‘cost-effective’ in the short term to encourage use of public transport through incentives and improved public transport fare settings, to allow individuals to save money on transport costs, as suggested in the Consultation Roadmap (page 28). However, the benefits of cheaper fares disproportionately favour communities in areas where public transport already offers good coverage and frequent services. Instead, a potentially much larger investment may be required to establish a network of accessible, low emissions transport in growth areas that will enable more people to have access to public transport as a reliable option. As noted by the Productivity Commission (2021) report cited in the Consultation Roadmap: “Public transport can only meet the goal of ubiquitous access if it is reasonably priced **and provides sufficient spatial coverage and service frequency**. This alone requires large public subsidies given Australia’s low-density cities.”<sup>2</sup>

The NGAA argues that, with a coordinated, place-based and targeted approach to decarbonising the transport network and system, it will be possible to support the achievement of net zero targets at the same time as providing greater accessibility to essential services and facilities that communities need in outer metropolitan growth areas.

Therefore, NGAA recommends that the approach adopted for developing policy and actions more closely considers and addresses the differences in travel needs of communities and the

<sup>1</sup> Climate Council of Australia, 2024, Next stop suburbia: Making shared transport work for everyone in Aussie cities. Accessed <https://www.climatecouncil.org.au/resources/next-stop-suburbia/>

<sup>2</sup> Productivity Commission, 2021, Public transport pricing, Research paper, Canberra. Accessed <https://www.pc.gov.au/research/completed/public-transport/public-transport.pdf>

disparities in coverage of both infrastructure and services that exist in outer metropolitan growth areas compared to inner urban and middle suburban areas of our capital cities.

To this end, the NGAA recommends that the proposed framework of ‘**avoid, shift and improve**’ to identify all opportunity for emission abatement be changed to ‘**integrate, enable and innovate**’ to highlight the importance of

- **integrated** land use planning to improving the efficiency and sustainability of the transport system
- the need for infrastructure that can **enable** the shift to more sustainable transport modes like active and public transport, and low emission travel alternatives such as low emission freight or passenger vehicles
- **innovation** in the technologies or efficiency of transport modes, systems and services.

As stated in the Consultation Roadmap (page 15), ‘Transport infrastructure is critical across all three domains’. The NGAA concurs with recent Climate Council of Australia (2024) report ‘Next Stop Suburbia’ which argues that “with the right infrastructure and services in place, we can make shared and active transport more attractive for more Australians, cut climate pollution further and faster this decade, and create safer, cleaner streets”. Achieving net zero emissions in rapidly growing communities will require not just integrated land use planning but dedicated funding for transport infrastructure that is strategically aligned to housing development and provides safe, accessible, convenient, low emission travel options to shopping, cultural and recreational facilities, health services, education and training, employment opportunities.

The recommendations of the NGAA reiterate our advocacy for a comprehensive and coordinated approach to infrastructure investment for outer metropolitan growth areas, as set out in the *NGAA Policy Platform 2023-24* (attached).

In relation to transport and the transport infrastructure sector specifically, the NGAA Policy Platform recommends:

**1. Targeted Federal Government funding for city-shaping infrastructure in growth areas**

- The majority of NGAA member council priority projects that require Federal Government funding are for transformative transport infrastructure projects, including major freeway and road links, which will have significant economic and other flow-on benefits.

**2. Major transport infrastructure funding to include multi-modal options**

- The majority of the funding for major infrastructure projects is focused on the road network for the benefit of private vehicle use and the freight network including trucks. These projects should also include funding and design for other transport modes such as buses, e-bikes, e-scooters, bikes and walking, as well as connections into local networks.

**3. Major transport infrastructure funding to include the delivery of pedestrian connections that support walkable neighbourhoods and bicycle infrastructure that supports safe travel for people of all ages and abilities.**

- Active transport infrastructure can also support improved health and wellbeing outcomes in communities who are time poor due to demographics and long commutes. Recent research shows that inadequate bikeways in urban areas, unsafe conditions for cyclists, and lack of connections to major transport hubs, are significant barriers to increasing the number of cycling trips each week<sup>1</sup>.

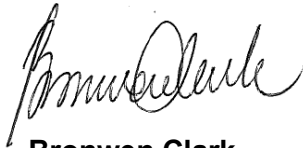
The NGAA regards the development of the Net Zero Roadmap and Action Plan as an opportunity to invest in creating resilient, liveable, thriving communities, by adopting a more coordinated approach to funding transport infrastructure in outer metropolitan growth areas that will enable the shift to lower emission active and public transport alternatives and deliver multiple co-benefits for our communities.

The NGAA welcomes the opportunity to respond to the Consultation Roadmap and provide the growth areas perspective. The actions towards decarbonisation of transport and infrastructure will directly impact on communities in national growth areas. Likewise, with strategic planning and coordinated investment our communities will be crucial to the successful achievement of common net zero goals. Given the scope of the issues raised in the Consultation Roadmap the NGAA would like to provide a more detailed response to the feedback questions. We therefore urge the Australian Government to engage directly with the NGAA and growth area councils in the next stage of the development of the Roadmap and Action plan.

#### Contact

Should you wish to discuss any of the matters raised in this response, please contact Anne Hurni, National Research and Policy Lead, on [anne.hurni@ngaa.org.au](mailto:anne.hurni@ngaa.org.au).

Yours faithfully



**Bronwen Clark**  
Executive Officer  
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<sup>1</sup> The Australian Cycling Economy, EY for We Ride Australia 2021, p11