

Attention: To the NSW Department of Planning  
Subject: Design and Place State Environmental Planning Policy (SEPP)

Submission  
By 30Please

23rd March 2021



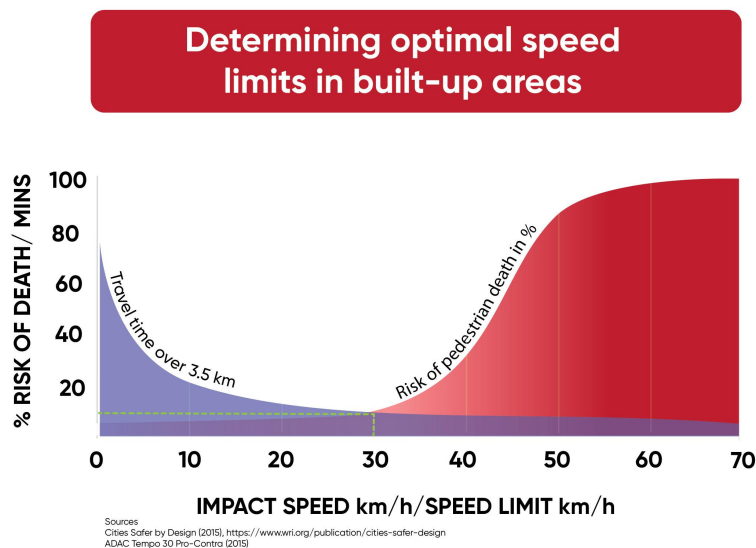
Many thanks for giving us the opportunity to provide feedback to the Design and Place State Environmental Planning Policy (SEPP).

[30Please](#) is a community campaign that advocates for 30km/h to become the default speed limit in residential areas in Australia. 30Please is a member of [CWANZ](#).

We support the goals of the Design and Place State Environmental Planning Policy (SEPP). You will find any of your goals much easier to be achieved if NSW followed the UN mandate for 30km/h limits in built-up areas.

30km/h limit for non arterial roads won price for Best Low Cost Idea at the NSW Public Space Ideas competition by the NSW Government and Committee for Sydney. It would be great to see this principle reflected in your new Design and Place State Environmental Planning Policy. <https://sydney.org.au/psic/entry/30-kph-limit-for-non-arterial-roads/>

We believe our neighbourhoods should be a place where people feel safe to play, ride, walk, cycle and from all the research from around the world we know that allowing cars to drive 50km/h in neighbourhoods comes with very little benefits but makes it very hard and costly to design great places.



We would propose to include more reference to child-friendly urban design in the SEPP.<sup>1</sup> We don't necessary mean the amount of skateparks and playgrounds in a city but more tend to consider the idea of the "Popsicle test": Would you, as a parent of an eight-year old child living in a given neighbourhood, let your child make their own way to a shop and buy a popsicle- and could they then get back home before it melted.<sup>2</sup>

The above principle brings together two dimensions of child-friendly cities: children's ability to get around their neighbourhood and the range of offers that their neighbourhood makes for them. There are some similarities to the 20 minute neighbourhood principles. However it is intuitively easier to understand for the community how applying this principle to children means that drivers will need to slow down and watch out: it is widely accepted that children make mistakes and that these mistakes should not be deadly. It is also clear to the most car-centric minds that children can't drive and therefore their only options to get around independently in their neighbourhood is active transport.

It might be interesting to consider Australian holiday parks as an example where people let their children walk and cycle unsupervised, where streets are a place to connect and gather and where there is a high sense of community. All this can be achieved at relatively low costs when drivers are mandated to drive 30km/h or less and told to share the street.



Above: Lake Conjola Holiday park, NSW

Designing neighbourhoods for low speeds but then displaying 50km/h speed limit signs like we currently see in Australia creates confusion: some parts of the community think that drivers should go slowly and watch out for children in neighbourhoods and other community members tell parents that their children should not be riding or

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<sup>1</sup> <https://globaldesigningcities.org/publication/designing-streets-for-kids/>

<sup>2</sup> Tim Gill: "Urban Playground: How child-friendly planning and design can save cities", 2021

playing on the street and but be “road aware” - effectively saying streets are too dangerous for children and they should not be there.

Displaying a 50km/h limit means that many drivers assume the street’s purpose must be that of driving through the neighbourhood fast and the street’s purpose can’t be anything else than that. Given the risk of dying when hit at 50km/h is 90% but less than 10% when hit at 30km/h<sup>3</sup>, it is not unreasonable for drivers to assume that they “own” the street.

Many of our High Streets have 60km/h limits and it needs metal fences to keep pedestrians safe. The noise levels and the traffic danger makes it very hard to create inviting places. Lowering speeds will be an essential step for placemaking.

The evidence is clear: reducing speeds reduces accidents, reducing speed saves lives and slower speeds in our communities improves quality of life.

While the majority of Australians already supports lowering speed limits in neighbourhoods<sup>4</sup>, the acceptance should increase after implementation. This would be consistent with experience from countries like the UK and Germany. Some smaller trials in Melbourne and New Zealand where 30km/h limits had been rolled out before 2020 have been successful and have been even more popular after people experienced the benefits.

In many other countries, physical traffic calming measures in 30 km/h zones are deemed to be essential to discourage drivers from exceeding the speed limit. However, in Australia we should aim to take advantage of a culture where driving above the speed limit is less common than in many other countries.

Enforcement, high penalty fees and the use of telematics for new drivers and fleet drivers can help with high compliance with the 30km/h limits.

Our campaign is not about carpeting towns with speed bumps. Area-wide speed limits to create a social norm to drive slowly and watch out are our preferred way as opposed to treating individual streets with speed humps to force drivers to slow down. Speed humps might increase acceleration- and braking-related emissions.<sup>5</sup>

Some physical measures could be used to slow down traffic, but these should be targeted at locations where speed and road danger is highest, similar to the roll out of the 20mph default speed limit in Wales.<sup>6</sup>

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<sup>3</sup> <https://roadsafety.transport.nsw.gov.au/speeding/index.html>

<sup>4</sup> The Heart Foundation has found in a [survey conducted in 2020](https://healthyactivebydesign.com.au/resources/publications/what-australia-wants-report) that the majority of Australians supports lower speed limits in neighbourhoods. Only 13% of people surveyed were unsupportive.

<sup>5</sup> <https://www.nice.org.uk/guidance/ng70/chapter/Recommendations#smooth-driving-and-speed-reduction>

<sup>6</sup> <https://gov.wales/20mph-task-force-group-report>

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We thank you for the opportunity to provide you with our feedback to the proposed strategy.



30Please.org Australia is part of the Streets for Life global movement led by the United Nations calling for 30km/h speed limits where people mix with motorised vehicles.