

Joint submission by UNSW academic staff with expertise in transport, planning, public health, sustainability, planning law and other relevant disciplines on:

State Significant Development SSD-79257208: UNSW Barker Street Carpark Expansion

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This submission is made in our capacity as UNSW Sydney academics with expertise across transport, city planning, public health, sustainability, planning law, and other relevant disciplines.

Overall position

1. We recommend that the proposal not be approved at this stage because:
 - a) the need for the proposal has not been demonstrated;
 - b) the proposal would result in significant environmental, social and health impacts;
 - c) those impacts have not been adequately assessed in the exhibited Environmental Impact Assessment;
 - d) the proposal is misaligned with UNSW and government strategies, policies and targets;
 - e) lower-impact and lower-cost alternatives have not been properly considered or assessed; and
 - f) the proponent has not fully addressed the Secretary's Environmental Assessment Requirements (SEARs).
2. Further work is needed on problem definition and options analysis before expansion of parking supply is approved.

Need for the proposal has not been demonstrated

3. Expanding parking supply is a means, not an end.
 - Framing expansion of parking as an aim in itself precludes consideration of lower-cost, more-equitable and more-sustainable means of improving access for growing numbers of staff, students and visitors.
 - We suggest a more appropriate aim would be: "To sustainably and equitably improve access to UNSW Sydney's facilities and services for growing numbers of staff, students and visitors".
4. Existing parking facilities are underutilised.
 - We could not find any baseline parking occupancy data in the EIS.
 - However, based on our observations, existing parking facilities are fully occupied for only a relatively short period in a typical teaching week (10 AM to 4 PM, Tuesday to Thursday).
 - In other words, for about 89% of a typical teaching week, there is spare capacity in the existing parking facilities.
 - Measures to manage this small demand peak should be considered before costly capacity expansion.
5. "Predict and provide" planning is outdated.
 - The proposal adopts an outdated "predict and provide" planning approach, whereby observed or potential increases in demand are used to justify

increases in capacity, which in turn induce further increases in demand, which in turn are used to justify further capacity increases, *ad infinitum* [1–3].

- “Predict and provide” planning has been subject to significant critique as it is associated with increased transport emissions, higher transport costs, urban sprawl, and poorer and less equitable access to activities [1,4].
- Contemporary transport planning emphasises equity of access and minimising negative impacts through travel demand management and integrated transport-land use planning. In 2024, the NSW Government committed to adopting a “vision and validate” approach as an alternative to “predict and provide” [5].
- As a leading global university and innovation leader, UNSW should be following best practice when it comes to managing parking demand.

6. Current peak demand is constrained by availability, not price.

- Current parking rates are heavily subsidised and well below the market price: as little as \$8 per day [6].
- As such, peak demand is currently constrained by scarcity and uncertainty: those who can do so make travel choices that mean they avoid parking congestion during peak periods (e.g., by choosing to use public or active transport, or changing their on-campus days).

7. Expanding supply will unlock suppressed demand.

- Increasing parking supply will initially make driving to campus more attractive.
- This will encourage more staff, students and visitors to drive to campus, until parking congestion returns to its equilibrium level. This is known as induced demand [1].

8. Campus growth does not require more parking and traffic generation.

- The UNSW campus is very well served by public and active transport. These have more than sufficient headroom to accommodate future growth in passenger volumes to/from campus.
- Many other global universities have shown that growth can occur without a corresponding increase in parking supply and traffic generation. For example, Stanford University in Silicon Valley has achieved significant growth while capping peak-hours traffic generation at 2001 levels [7].

9. There is no evidence the proposal will reduce spillover onto local streets.

- The proposal assumes that increasing on-campus parking supply will reduce demand for on-street parking around the campus. However, there is no evidence to support this claim.
- If the aim is to reduce spillover onto surrounding streets, there are proven, evidence-based measures, including pricing, restrictions and enforcement [8,9].

The proposal will have significant environmental, social and health impacts and these have not been adequately assessed

10. Greenhouse gas emissions are not adequately assessed.

- The proposal will generate significant emissions from embodied carbon, construction activity, operation, and additional vehicle travel and ownership induced by increasing parking supply. The embodied carbon alone is estimated at more than 3 million kg CO₂e.
- The exhibited EIS does not provide a complete greenhouse gas inventory across Scope 1, Scope 2 and Scope 3 emissions.

11. Air pollution impacts are not adequately assessed.

- The increased vehicle traffic induced by the proposal will increase emissions of air toxics such as nitrogen oxides (NO_x) and particulate matter (PM_{2.5} and PM₁₀) [10–12].
- These impacts are particularly relevant in a hospital and education precinct with high pedestrian activity.
- The exhibited EIS does not include an assessment of the air quality impacts of the additional traffic generated by the proposal, and the consequent health impacts.

12. Non-exhaust emissions are not assessed.

- A substantial proportion of vehicle-related air pollution is from non-exhaust sources such as brake wear, tyre wear, road surface wear and resuspension of road dust.
- These emissions occur regardless of whether vehicles are electric or internal combustion [13,14].
- The exhibited EIS does not assess these emissions, despite increasing evidence of their health and ecological impacts [12].

13. Road safety impacts are not adequately assessed.

- The proposal will cause traffic volumes to increase. Higher traffic volumes are associated with increased crash and injury risks [15].
- The proposal includes a new signalised intersection at Barker Street and Southern Drive (UNSW Gate 14). Signalised intersections are hazardous for all road uses because:
 - they entice high and hazardous traffic speeds, relative to safer intersection types [16,17];
 - they enable higher traffic volumes;
 - compliance with red traffic signals is less than 100% [18];
 - they can give pedestrians a false sense of security [17]; and
 - they allow conflict between turning vehicles and crossing pedestrians [16].
- The exhibited EIS reviews historical crash data but does not quantify the expected change in crash and injury risks expected with increased traffic volumes and intersection reconfiguration.

14. Impacts on walkability are not assessed.

- The proposed signalised intersection at Barker Street and Southern Drive (UNSW Gate 14) will impose additional delays on pedestrians.
- The additional traffic generated by the proposal will reduce perceived and objective pedestrian safety [15].
- Together, these impacts will make walking to, from, and near the campus less attractive.
- The exhibited EIS does not assess impacts on walkability.

15. Impacts of increased car dependence are not assessed.

- The proposal would make car travel more attractive and other modes of transport less attractive, further entrenching car dependence.
- Car dependence is associated with:
 - poorer physical and mental health [10,19–21];
 - high household transport costs and financial stress [22]; and
 - reduced productivity [19,20,23].
- The exhibited EIS does not assess the impacts of increased car dependence.

16. Cumulative impacts are not adequately assessed.

- There are other planned and approved developments in the surrounding neighbourhood that will increase parking supply and traffic generation.
- The cumulative impacts on health, road trauma, environment, and the community are not assessed.

17. Green features are welcome but do not mitigate the negative impacts.

- The benefits of solar panels, EV charging and landscaping are far outweighed by the negative impacts of the proposal.
- These features could be implemented without increasing car parking supply, traffic generation, and associated impacts.

18. Negative impacts are inequitably distributed.

- Traffic-related impacts (including noise, air pollution, climate change, road trauma, urban sprawl) are known to disproportionately affect disadvantaged populations, including low-income households and Indigenous peoples [10,19,22].

The proposal is misaligned with UNSW and government strategies, policies and targets

19. The proposal is misaligned with UNSW's Net Zero Strategy.

- UNSW's Net Zero Strategy commits the University to reduce total emissions across Scope 1, Scope 2 and Scope 3 sources by 50% by 2030 and to achieve net zero by 2050 [24].
- The proposal is expected to increase emissions through embodied carbon, construction activity, operation, and increased private vehicle travel to/from campus.
- A proposal that significantly increases emissions is misaligned with UNSW's Net Zero Strategy.

20. The proposal is misaligned with the Australian Government's net zero targets.

- The Australian Government's legislated national targets are a 43% reduction in emissions below 2005 levels by 2030 and net zero by 2050 [25].
- A proposal that is expected to significantly increase greenhouse gas emissions is misaligned with these national targets.

21. The proposal is misaligned with Randwick City Council's net zero objective.

- Randwick City Council has committed in principle to achieving net zero greenhouse gas emissions by 2030 [26].
- The proposal is expected to significantly increase greenhouse gas emissions.
- The proposal is therefore misaligned with Randwick City Council's net zero objective and local sustainability direction.

22. The proposal is misaligned with UNSW's transport mode share target.

- UNSW's Environmental Sustainability Plan includes a target that at least 85% of staff and student trips to campus be made by sustainable modes [27].
- The proposal would increase the convenience and attractiveness of driving to campus relative to public transport, walking and micromobility.
- The proposal is therefore misaligned with UNSW's own transport mode share target.

23. The proposal is misaligned with UNSW's Living Campuses objective and active travel commitments.

- UNSW's Environmental Sustainability Plan is organised around Climate Action, Living Campuses and Resource Efficiency [27].
- Under Living Campuses, UNSW says it aims to create healthy, resilient places for learning and research where people and nature thrive, including by supporting active lifestyles through an active travel masterplan and improved facilities [28].
- A proposal that increases motor vehicle traffic, worsens local air quality, and makes walking and micromobility less attractive is misaligned with these commitments.

24. The proposal is misaligned with the NSW Government's Transport Strategy.

- The NSW Government's Transport Strategy emphasises reducing car dependence, increasing the share of trips by public and active transport, and integrating land use and transport to support sustainable access [29].
- The strategy prioritises moving more people with less traffic, improving safety, and reducing emissions and environmental impacts from transport [29].
- A proposal that expands parking supply and induces additional private vehicle travel is misaligned with these strategic objectives.

25. The proposal is misaligned with the NSW Clean Air Strategy.

- The NSW Clean Air Strategy 2021–2030 is the whole-of-government strategy for improving air quality and minimising the adverse effects of air pollution on human health [30].
- A proposal to expand parking supply and increase traffic-related air pollution is misaligned with the NSW Clean Air Strategy.

26. The proposal is misaligned with Australia’s National Clean Air Agreement.

- The National Clean Air Agreement provides the framework for governments to address air quality issues and deliver health, environmental and economic outcomes [31].
- The proposal is expected to increase local air pollution.
- The proposal is therefore misaligned with Australia’s national clean air framework.

27. The proposal is misaligned with Randwick City Council’s Integrated Transport Strategy and Active Transport Plan.

- Randwick City Council’s Integrated Transport Strategy seeks to encourage a safe, efficient and sustainable road and transport network, with sustainable transport options as the preferred choice [32].
- Randwick’s Active Transport Plan is directed to making it easier for people to move around the city on foot or by bike by providing safe, connected and accessible paths [33].
- A proposal that increases traffic volumes and degrades walking and cycling conditions is misaligned with these local strategies.

28. The proposal is misaligned with Australia’s National Road Safety Strategy.

- Australia’s National Road Safety Strategy 2021–30 aims to reduce fatalities by at least 50% and serious injuries by at least 30% by 2030, and to put Australia on a path to zero deaths and serious injuries by 2050 [34].
- The proposal would increase traffic volumes and road danger around a university campus with very high pedestrian activity.
- The proposal is therefore misaligned with Australia’s National Road Safety Strategy.

29. The proposal is misaligned with NSW’s Towards Zero road safety strategy.

- The NSW Government’s 2026 Road Safety Action Plan, under the Towards Zero framework, seeks to halve deaths and reduce serious injuries by 30% on NSW roads by 2030 [35].

- The proposal would increase traffic injury and fatality risks.
- The proposal is therefore misaligned with NSW's road safety strategy and Towards Zero commitment.

Alternative solutions have not been assessed

30. The exhibited EIS does not include an assessment of alternative solutions.

- It considers only variations of the proposed parking solution (e.g. different design and access options).
- It does not assess different approaches to solving the identified problems, such as demand management or stricter enforcement of on-street parking restrictions.

31. The do-nothing option has not been assessed.

- A do-nothing or do-minimum scenario is a standard requirement of appraisal and business case development.
- Assessing the do-nothing scenario may reveal it to be the most cost-effective and sustainable option.
 - If parking supply were not to be increased, demand for parking would continue to be constrained by capacity.

32. Pricing options have not been assessed.

- Pricing has been shown to be very effective in managing parking demand. It can reduce demand, spread peak demand, and improve utilisation [8,36].
- The current annual and other periodic permits create a sunk cost: staff and students who have paid for a periodic parking permit are likely to choose to drive to campus because they have already paid for parking, even on days when they have other options.

33. Other travel demand management approaches have not been assessed.

34. Options for improving and incentivising campus access by public transport, walking and micromobility have not been assessed.

- UNSW currently provides financial incentives for staff and students to drive to campus (salary packaging of private vehicles and subsidised parking).
- It provides no financial incentives for staff or students to use public transport.
- International students are not eligible for concession fares.

- There is significant scope to enhance existing light rail and bus services to the campus, e.g., through providing priority at intersections, installing more bus lanes, and increasing service frequencies.
- There is significant scope to improve walking access to the campus, e.g., through reduced waiting times at signalised intersections, more mid-block crossings, and wider footpaths.
- There is significant scope to improve micromobility access to the campus.
 - A substantial number of students reside in the nearby Green Square urban renewal area, but there is currently no low-stress micromobility facility/route between Green Square and the campus.

35. Integrated transport-land use options have not been assessed.

- There is significant scope to increase the supply of affordable housing close to campus.
 - This would give more students and staff the opportunity to live in areas close to campus with better walking, micromobility and public transport options.

Secretary's Environmental Assessment Requirements (SEARs) not fully addressed

36. Embodied emissions from the public domain works are not fully assessed as required by the SEARs.

- NSW's embodied emissions requirements require disclosure of embodied emissions attributable to the development.
- The exhibited embodied emissions study states that it considers only the carpark building and does not consider the public domain works.
- The exhibited material therefore does not clearly disclose embodied emissions attributable to the whole development, including the public domain works.
- In that respect, the exhibited response to the embodied emissions requirement is incomplete.

37. The traffic, transport and accessibility SEAR is not adequately addressed in relation to road safety.

- The traffic, transport and accessibility SEAR requires identification of potential road safety impacts, including pedestrian and cyclist conflict.

- The exhibited material reviews historic crash data and intersection performance but does not quantify the expected change in crash and injury risk associated with increased traffic volumes and intersection reconfiguration.
- In a campus environment with high pedestrian activity, this omission is significant.

38. The traffic, transport and accessibility SEAR is not adequately addressed in relation to cumulative impacts.

- The traffic, transport and accessibility SEAR requires consideration of cumulative impacts from surrounding approved developments.
- There are other proposed/approved developments in and around the campus, but the exhibited material does not provide a robust cumulative assessment of the combined impacts on traffic, safety, air quality and community amenity.
- The treatment of cumulative impacts is therefore inadequate.

39. The traffic, transport and accessibility SEAR is not adequately addressed in relation to sustainable travel choices.

- The traffic, transport and accessibility SEAR calls for measures to promote sustainable travel choices, including minimising car parking provision and encouraging car share and public transport use.
- The proposal is, in substance, a major increase in car parking provision.
- Although the exhibited material includes some discussion of travel planning, it does not demonstrate that parking provision has been minimised or that sustainable travel options have been prioritised ahead of expansion of parking supply.

39. The greenhouse gas and ecologically sustainable development requirements are not adequately addressed in relation to transport-generated emissions.

- The exhibited material includes a Net Zero Statement and an ESD Report.
- However, these documents focus primarily on operational energy, fossil-fuel-free operation, renewable energy and materials disclosure.
- They do not provide a quantified assessment of the additional greenhouse gas emissions generated by the traffic induced by the parking expansion.
- In that respect, the exhibited response to the greenhouse gas and ecologically sustainable development requirements is incomplete.

40. The public domain and access requirements are not adequately addressed in relation to minimising conflict between vehicles, cyclists and pedestrians.
- The exhibited material states that the public domain and access design seeks to improve safety and manage movement.
 - However, the proposal would increase traffic volumes around the campus and introduce a signalised intersection that will be hazardous for all road users.
 - The exhibited material does not demonstrate that vehicle, bicycle and pedestrian conflicts have been minimised.

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