

The Sutherland to Cronulla Active Transport Link: the case for a safe, direct path

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Foreword

Transport for NSW is progressing plans for the Sutherland to Cronulla Active Transport Link (SCATL), with an announcement in June 2022ⁱ, that construction of the eastern section of Stage 2 from Jackson Avenue, Miranda to Gannons Road, Caringbah, will begin in early 2023. Following community feedback, the western section linking Jackson Avenue to the completed Stage 1 route is being revised to explore alternative options to the unpopular Oak Avenue, Flora Street and Kingsway alignment.

Bicycle NSW, Sutherland Shire Council and the community raise serious concerns that optimal routes continue to be overlooked, and that reasons provided by Transport for NSW to abandon the in-rail corridor SCATL are not valid. Unfortunately, the current 'preferred alignment' risks creating infrastructure that is dangerous and falls well short of Transport for NSW Policy standards.

This project provides a once-in-a-generation opportunity to deliver bike riding infrastructure that the local community has advocated for since the early 2000s. In 2015, Transport and Infrastructure Minister Andrew Constance committed to SCATL with over half the 9km route to be located within the rail corridorⁱⁱ. SCATL was a NSW Government election promise in 2019.

Since 2018, a series of new policies and strategies have been released by NSW Government that aim to achieve a much better balance of movement and place with vastly improved facilities for active transport. There is clear agreement from all sides of politics that walking and cycling are essential to enable a healthier, less car-dependent future as Sydney grows. NSW now has a Minister for Active Transport and new impetus to deliver projects for walking and cycling.

Bicycle NSW wishes to reiterate that this is the best moment in recent years for local and State governments to work together to create a truly transformational network for cycling, but there is no time to waste.

This document sets out the background and planning history of SCATL, collates feedback from Council, community and advocates on the current proposals, shines a light on the problems of shared paths and makes recommendations for the next steps. The analysis and recommendations are informed by an inspection of the area with Sutherland Shire Council staff in July 2022.

Bicycle NSW urges Transport for NSW to:

- Return to the original concept of SCATL as a 'spine' route, supporting high volumes of bike riders, higher speed cycling and long-distance commuting. A network of shared paths, bicycle paths and quietways on adjacent streets will create connections to local destinations.
- Use the rail corridor alignment favoured by the community and Sutherland Shire Council for the majority of the route.
- Collaborate closely with Sutherland Shire Council. Council has been working on SCATL for 20 years and has detailed local expertise.
- Establish a community reference forum to assist with the finalisation of the route and design for SCATL Stages 2 and 3
- Develop the western part of SCATL Stage 2 between Oak Road and Sylvania Road in advance of the eastern section that is currently slated to go firstⁱⁱⁱ
- Consider road space reallocation where sections of SCATL use the road corridor

Bicycle NSW has been the peak bicycle advocacy group in NSW for forty-seven years, and has over 30 affiliated local Bicycle User Groups. Our mission is to *'create a better environment for all bicycle riders'* from 8 to 80 years of age, and we support improvements to facilities for pedestrians and cyclists. We advocate for new cycling routes that provide connections to jobs, schools and services for daily transport and recreation trips. Bike riding provides a healthy, congestion-reducing, low-carbon form of travel that is quiet, efficient and attractive for all ages with the correct infrastructure design.

In the preparation of this document, Bicycle NSW would like to acknowledge the many years of research and advocacy undertaken by Sutherland Shire Council, Sutherland Shire Environment Centre, local bicycle riders and community members who have all provided feedback to Transport for NSW in order to make SCATL best meet the needs of Sutherland Shire.

Project background

Planning and design work for Sutherland to Cronulla Active Transport Link has been ongoing for nearly 2 decades. The project timeline is set out in the three Reviews of Environmental Factors and other documents produced by Transport for NSW and Sutherland Shire Council. A brief overview with maps of the changing alignment follows.

2006-2010

In 2006, duplication of the rail line created an opportunity to deliver a new active transport link between Sutherland and Cronulla. Over 3,000 Sutherland Shire residents petitioned the NSW Government to include space for a shared off-road cycleway / pedestrian path along the rail corridor. This east-west route was determined to be a vital missing link in the regional cycling network^{iv}. The provision of a rail trail was consistent with similar initiatives identified in the NSW Bike Plan 2010, including a 16.8km cycleway along the rail easement between Liverpool and Parramatta.

Preliminary scoping in 2006 favoured an in-corridor active transport link, with the rail easement used for 4km, including the majority of the Miranda to Woollooware section^v. Maunsell undertook another detailed study in 2008 and claimed that the in-corridor option was not viable except for two short sections east of Miranda, which added up to 1.2km. Cross section diagrams show the shared path level with the rail tracks in these areas^{vi}.

In May 2009, the NSW Transport Minister instructed the RTA to undertake a study to identify alternative route options^{vii}. GTA Consultants were engaged by Sutherland Shire Council and the RTA to look at 4 options for the route. Field studies showed that the rail corridor did in fact provide a practical solution to create a wide, level off-road path, in combination with existing off-road paths and low traffic back streets. Kingsway, President Avenue and Forest Avenue were also assessed but the rail corridor was favoured. Preference for the rail corridor was confirmed by 85% of key stakeholders during consultation. 33% or 3.7km of the alignment would be situated within the rail easement, with the remainder on adjacent streets.^{viii}

2012-2014

Sutherland Shire Council's 2012 Environment and Sustainability Strategy aimed to increase active transport and reduce car dependence. A 2013 study conducted by the Australian Bicycle Council of 723 households in the Sutherland Shire found that all age groups have lower participation rates of cycling for recreation and transport than other Sydney metropolitan areas^x. The need for SCATL was re-established with the strategic objective of addressing the heavy reliance on motor vehicle transport for short trips in the Shire by improving opportunities for cycling and walking.

In October 2013, the NSW Transport Minister committed funding to the detailed design of SCATL and planning studies continued throughout 2014^x.

June 2015

A strong level of community commitment and engagement led to a ministerial commitment in 2015 to deliver over half of the project in the rail corridor.^{xi} President Avenue was proposed for the Kirrawee to Sutherland section and Denman Avenue was chosen over the rail corridor for Caringbah to Woollooware (Figure 1).

A best-practice shared path constructed off-road, and within the rail corridor where possible, would minimise steep gradients and deviation from the 'desire line', enable Crime Prevention Through Environmental Design

(CPTED) features to be incorporated such as side road access, minimise the need to change on-street parking, avoid impacts to state heritage items and improve access for rail maintenance and emergency services^{xii}.

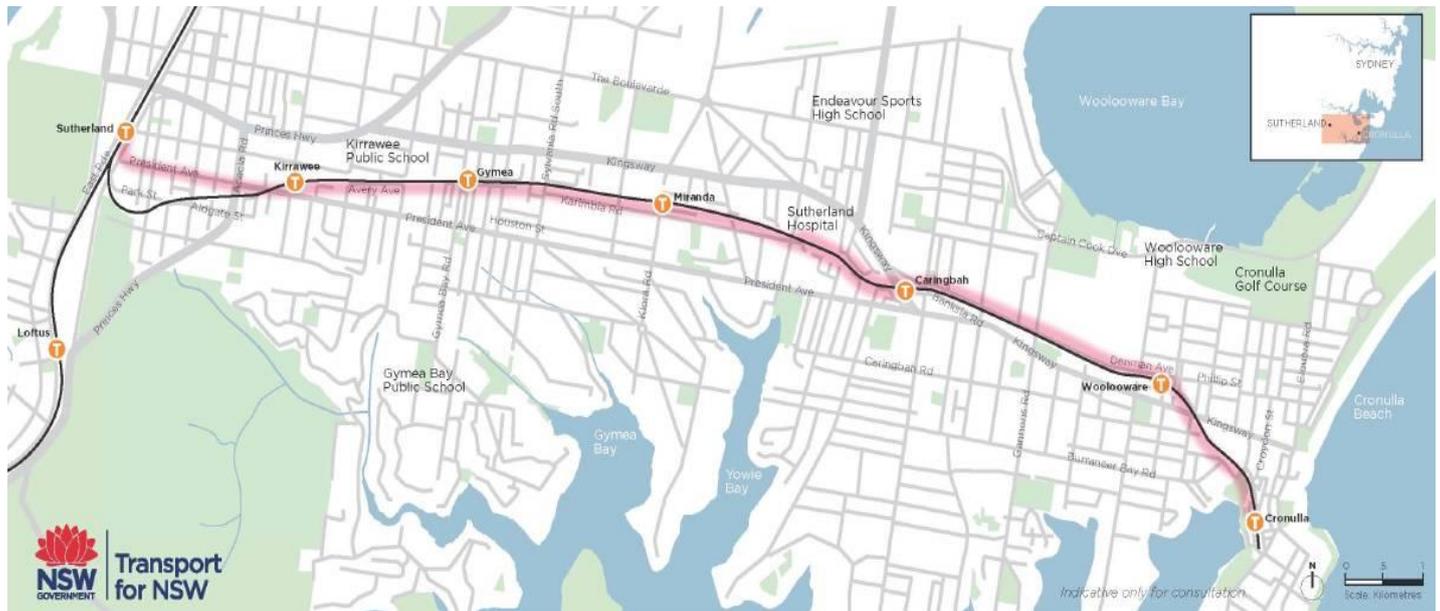


Figure 1: The original route for SCATL announced in 2015 used the rail corridor for over 50% of its length (Source: TfNSW)

November 2015

The Review of Environmental Factors^{xiii} was published showing SCATL mostly aligned with the railway corridor (Figure 2). However, only 29% was actually within the rail easement and Sutherland Shire Council stated it did not support the proposal to use Karimbla Road between Sylvania Road and Kareena Road, Miranda, and Kingsway between Gymea Gannons Road and Connells Road, Cronulla^{xiv}.

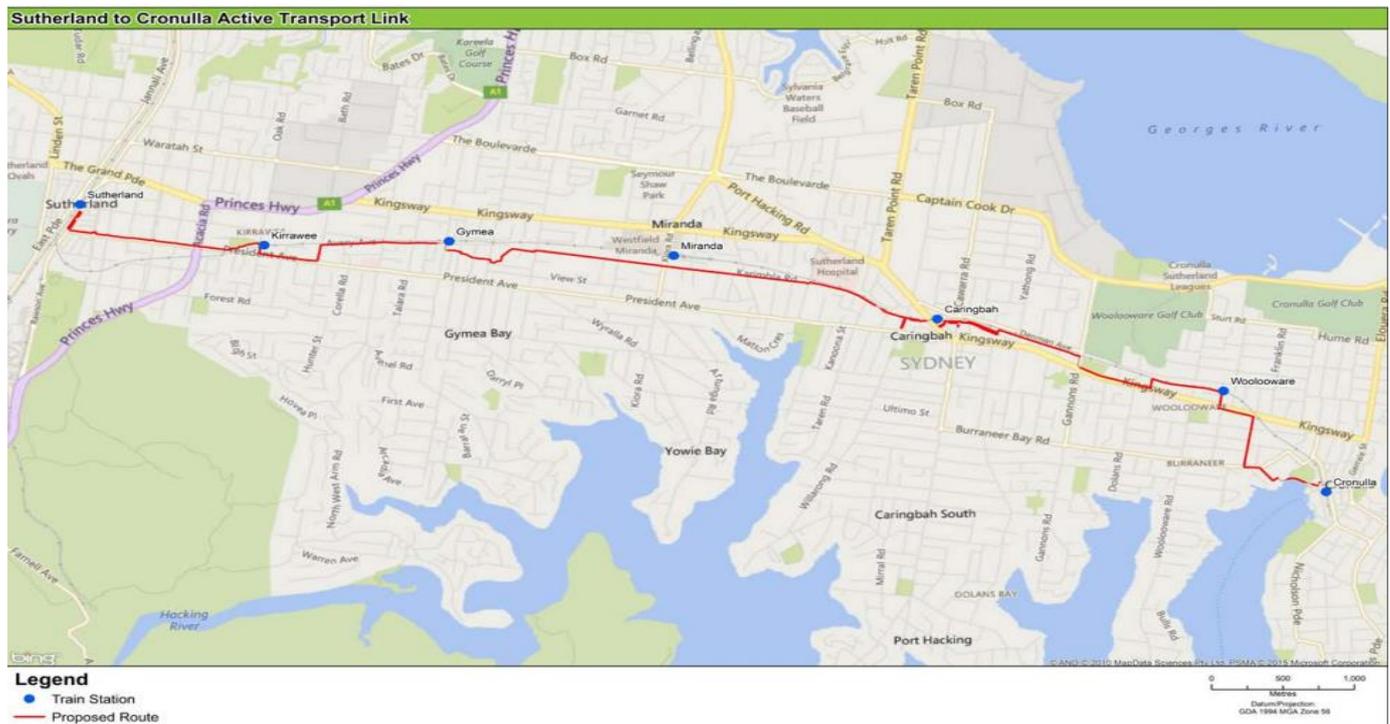


Figure 2: The 2015 SCATL fully connects Sutherland to Cronulla with a mixture of rail corridor and road reserve alignments (Source: TfNSW REF 2015)

In response to the submissions received, including from Sutherland Shire Council, TfNSW advised that the preferred route alignment had changed to include 59% in the rail corridor^{xv}.

October 2018

The Review of Environmental Factors for Stage One (Sutherland to Kirrawee)^{xvi} was released by TfNSW.

Early 2021

SCATL Stage 1 was completed. Always intended to lie outside the rail corridor, Stage 1 begins at Sutherland Station on McCubbens Lane, and ends at Pollard Park near Kirrawee Station (Figure 3). It comprises 2.5 km of a mixture of shared paths and separated pedestrian bicycle paths, with various pavement profiles and four crossing treatments for the six intersections. It is built in accordance with Austroads Guide to Road Design Part 6A: Paths for walking and cycling.

The new cycleway has been well received and the community expected that the safety, comfort, directness and amenity would continue with SCATL Stage 2.



Figure 3: The route for SCATL Stage 1 (Source: TfNSW)

March 2021

On 30th March 2021, there was a public announcement by TfNSW of substantive changes to SCATL Stage 2. The new 'preferred alignment' would place the cycleway entirely outside the rail corridor (Figure 4).

Numerous concerns were immediately raised by Sutherland Shire Council^{xvii}, Sutherland Shire Environment Centre^{xviii}, SSEC, Bicycle NSW and community members about the revised route:

- SCATL Stage 2 is indirect and does not follow the line of desire for commuting bicycle users.
- No convincing rationale was provided for abandoning the rail corridor.
- The new route will cross hundreds of driveways and many intersections, making it unsafe
- There are no plans for how Sutherland-Cronulla Active Transport Link will actually reach Cronulla.

- The Kingsway diversion will be unpleasant for walking or cycling with hills and traffic signals making it slow and inefficient.
- A 2.5m wide shared path is not adequate for a regional cycle route
- The removal of more trees will be required for the road option than the rail corridor
- There is already a footpath so the proposed shared path will not enhance walking along a busy road; the removal of trees to create a shared path which will make it even less pleasant.
- A high-quality, safe and efficient active transport route along the rail corridor will provide essential alternatives to driving and reduce growth in traffic congestion as high-density housing is built.
- Less expensive connectivity to suburbs and local destinations can be added after the 'spine' is established – such local routes must not replace SCATL.



Figure 4: The new SCATL alignment announced in March 2021 (Source: TfNSW)

May 2021

Sutherland Shire Environment Centre and Bicycle NSW produced a [video](#) highlighting how a shared path in the road environment will have poor safety and amenity outcomes due to conflict with pedestrians, driveways and side streets. A new [petition](#) was launched with gathered hundreds of signature from community members supporting the use of the rail corridor.

October 2021

TfNSW published a consultation report^{xix} reiterating that a path within the rail corridor is not feasible and will no longer be considered.

It is evident from the fact the revised outline plan received 400 responses that there is a strong community interest. Only 11% supported the revised alignment outside the rail corridor. It is rare that communities engage so strongly on active transport.

October 2021

TfNSW released the Review of Environmental Factors 2021^{xx} for the out-of-corridor Stage 2 route.

A shortlist of 6 options was presented and weighted according to criteria of cost, safety, community preferences:

Option name	Type	Features
1a Kirrawee to Cronulla	In corridor	Links Kirrawee to Cronulla town centre- 8.3 kilometres. Includes 4 bridges and one underpass. Avoids Kingsway
1b Kirrawee to Caringbah	In corridor	Same alignment as 1a, terminating at Gannons Road. Includes three bridges and one road underpass.
1c Gymea variation	In corridor	Same alignment as Option 1a connecting Kirrawee to Cronulla with a 700 metre deviation at Gymea. Includes four bridges and one underpass.
2a North Kingsway	Road network	Links Kirrawee Station to Cronulla Town Centre using the existing road network north of the rail corridor. 9.1 kilometres. Variety of types (shared path, separated cycleway and shared zone) No bridges or underpasses.
3a In corridor to Sylvania Rd	Hybrid	Uses residual space within the rail corridor and the local street network parallel to the corridor from Kirrawee Station to Sylvania Road between Gymea Station and Miranda Station. Then exits the rail corridor, travels north to Kingsway and follows the same alignment as Option 2a. Includes one underpass at Gymea Station, but no bridges.
3b In corridor to Miranda	Hybrid	From President Avenue, Kirrawee, this option uses low traffic streets on the southern side of the rail line, past Gymea to Wandella Road. From Wandella Road, this option enters the rail corridor and uses space on the south of the track between Miranda and Caringbah Station. Exits on Kingsway and travels along the south side of Denman Avenue and local streets to Cronulla Town Centre. Includes two bridges at Miranda.

Table 1: SCATL Stage 2 options (Source: TfNSW SCATL REF 2021, p2-11)

Although the out-of-corridor option was least preferred by local stakeholders, the 2a North Kingsway option (Figure 5) was chosen over others. TfNSW claim that safety, amenity, tree preservation and connectivity informed the decision. However, it is assumed that cost and technical issues were key factors.

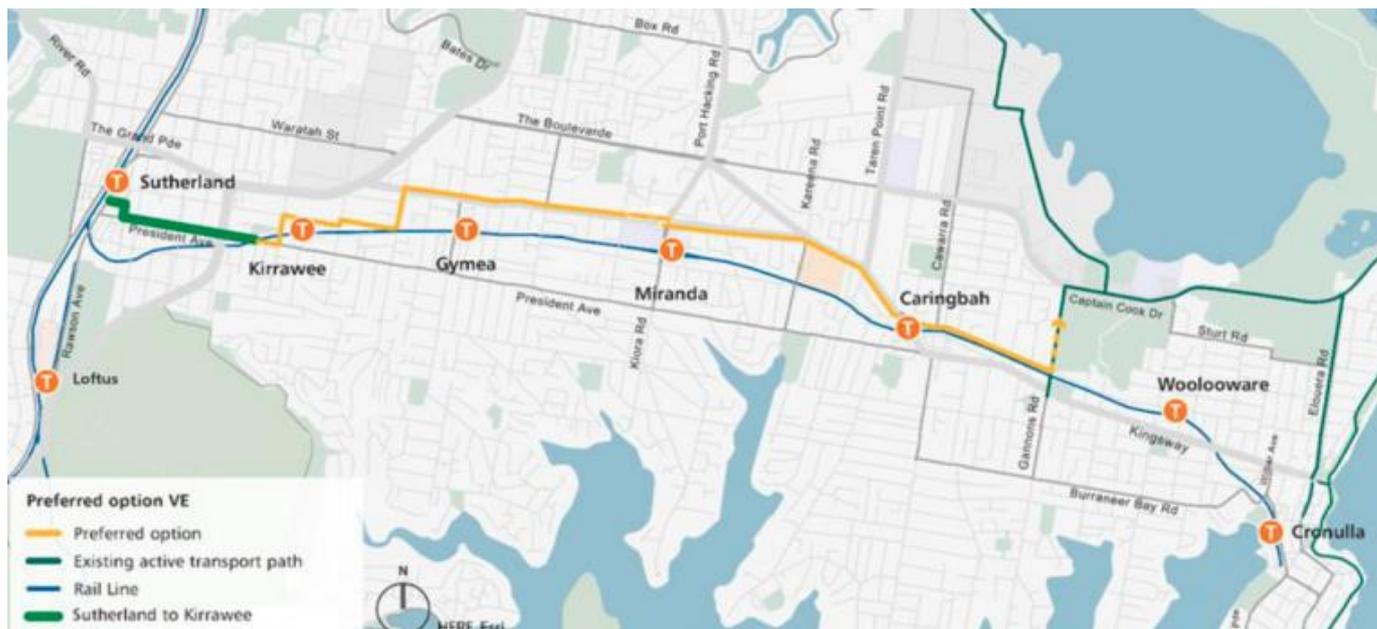


Figure 5: Preferred option in the REF 2021 (Source: TfNSW)

The preferred 1a in-corridor option included four bridges and one underpass which added substantially to the cost. However, it was very frustrating that no basic '1d' reduced-cost alternative that excluded the bridges and underpasses and created at-grade road crossings was presented to the community. Furthermore, Options 1a, 1b, and 1c do not consider that sections of SCATL could be delivered as a narrower 2.5m wide cycle-only path if necessary.

December 2021

Sutherland Shire Council's response^{xxi} to the REF 2021 highlighted the safety and user acceptance concerns associated with the Kingsway being the principal route and recommended advancing the western segment of SCATL Stage 2 within the rail corridor in alignment with the previous 2015/2016 REF. Council reiterated its support of the rail corridor route as per the Council resolution of 24 May 2021^{xxii}

Bicycle NSW made a submission which can be read [here](#). The submission sets out serious concerns around safety, amenity, lack of separation from pedestrians, and connectivity, and provides counter-arguments to TfNSW claims that the in-corridor option is sub-optimal. Bicycle NSW also calls for transparency over the actual costs of construction in the rail corridor, with a breakdown of key line items^{xxiii}.

June 2022

The submissions report^{xxiv} is released. The report states how the rail corridor route has community support and will support faster journeys. 92 formal submissions were made, many raising serious concerns about the new route and highlighting how important SCATL continues to be to the community.

June 2022

TfNSW released a community update^{xxv} announcing that:

- the route west of Sylvania Road through Kirrawee and Gymea will be revised to focus on the urban streets and reserves to the south of the railway line;
- investigations into the best route through Miranda between Sylvania Road and Jackson Avenue will continue;
- the on-road route from Jackson Avenue, Miranda to Gannons Road, Caringbah is at detailed design stage and construction will start in early 2023. \$65 million has been allocated to this section of SCATL by NSW Government^{xxvi} (Figure 6)

The community update reiterates why the in-corridor route has been dismissed – it would be an 'infrastructure-heavy' design with unattractive fences, few exit points, a lack of passive surveillance and little shade. However, the change of level shown in the cross section (Figure 7) does not align with earlier cross sections prepared by Maunsell^{xxvii} or the condition observed during site visits; the diagram shows the worst case scenario which only applies to a small section of the rail corridor.

Notably, there is still no mention of the costs of using the rail corridor.

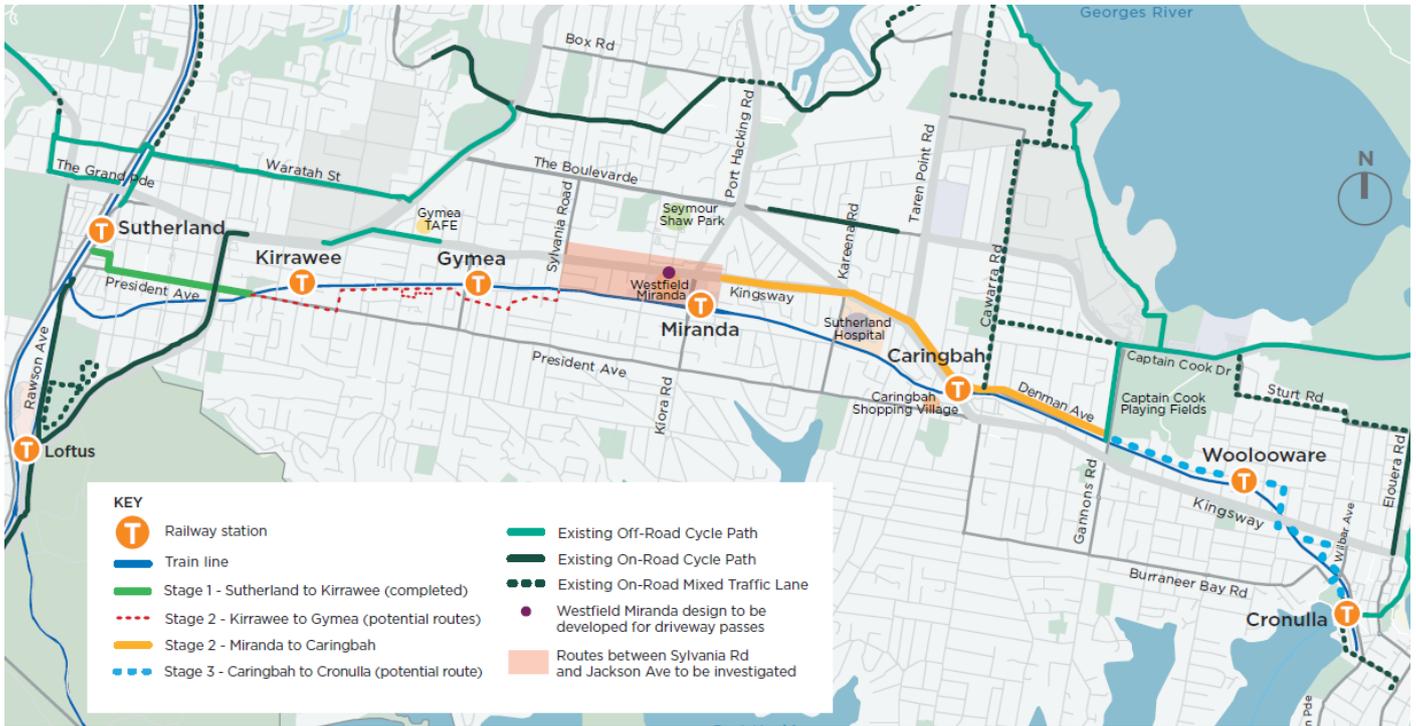


Figure 6: The June 2022 announcement breaks the SCATL Stage 2 into three sections and commits to starting work on the Miranda to Caringbah section (Source: TfNSW)

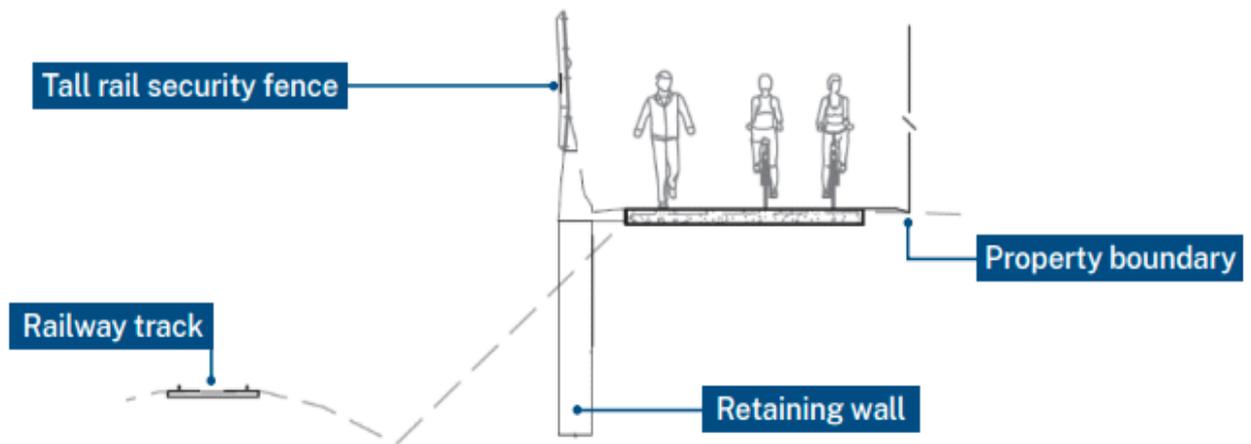


Figure 7: Section used to justify not delivering SCATL in the rail corridor (Source: TfNSW)

July 2022

Sutherland Shire Council's submissions report^{xxviii} recognised that Transport for NSW had showed some flexibility in response to Council's REF 2021 submission and the reconsideration of the west and central sections is welcome.

However, Bicycle NSW, Council and the community still do not have sufficient information to accept the rail corridor cannot be used for this project. The rail corridor option is still regarded as the 'optimum outcome and providing the best hope of genuine transport mode shift to active transport from cars'.

July 25th 2022

Bicycle NSW visited the area with staff from Sutherland Shire Council. Travelling from Sutherland to Woolooware, the in-corridor and on-road route options were assessed for all sections of SCATL.

Site photos and detailed notes about each section are compiled in **Appendix A**. A selection of photos is shown in Figure 8.

Our 3 key takeaways:

- **Along most of the rail corridor, there is a very wide flat glassy area level with the tracks on the southern side. Only in the Wandella Road area is there a change in level that would necessitate the concrete retaining walls shown in TfNSW cross section – and this would probably not be needed if a 2.5m cycle-only path was provided.**
- **The street trees along Avery Avenue and Denman Avenue should be protected. There is plenty of unutilised road space that could be repurposed for cycling infrastructure if SCATL has to be located the road reserve**
- **SCATL along the rail corridor can be delivered with at-grade crossings of Oak Road, Clements Parade, Gymea Bay Road, Sylvania Road, Wandella Road, Kiora Road and Gannons Road. Access to the rail corridor from these roads already exists.**

It is clear from the photographs and observations by Bicycle NSW that the rail corridor option has been unnecessarily discounted by TfNSW.



Figure 8: Highlights from Bicycle NSW's site tour of the SCATL route

Strategic context

Sutherland Shire's population is growing and traffic congestion is a worsening problem. Private vehicles continue to be the main mode of transport in the Sutherland Shire. 76% of trips are made by car (either as driver or passenger) compared to an average of 71% in Greater Sydney^{xxix}.

Compared to similar local government areas, the Sutherland Shire has high employment self-containment (41% of the working population live and work in the area), a high proportion of short trips and a good rail service to support multi-modal mobility. The Shire is well-placed to reduce dependence on driving.

Since 2019, there has been a **seismic shift in Transport for NSW policy direction**, framed by innovative thinking around 'place' after 70 years of car-centric planning that focused on movement to the detriment of community, urban amenity, walkability, public health and air quality. The Movement and Place Framework takes a cross-governmental integrated approach to infrastructure projects and land use design. It is bolstered by the Road User Space Allocation Policy CP21000^{xxx}, published by Transport for NSW in early 2021. This policy establishes a road user hierarchy that considers pedestrians first and private cars last, and provides local and State governments with a **powerful lever** to prioritise road space for active transport. Multiple environmental and health benefits will flow from increased walking, cycling and public transport use. The streets will be more equitable for Sydney-siders of all ages, incomes and abilities.

There has never been a better time to build infrastructure for bike riding and active transport. As the new Minister for Infrastructure, Cities and Active Transport, Rob Stokes MP, set out in a recent speech^{xxxi}, active travel projects that stitch the suburbs together and enable people of all ages and abilities to get around without a car are more sustainable than megaprojects. He stressed that the NSW Government will focus on completing active transport networks. Such projects have big benefits, and not only for reducing pollution and congestion. Active mobility improves public health, activates high streets, helps build social connections and addresses inequality.

Bicycle NSW is committed to this objective, but in order to achieve it we emphasize that most people will not switch to walking or cycling, or allow their children to do so, if they feel unsafe^{xxxii}. Infrastructure that fails to meet the needs of children and elders will not lead to the mode shift essential to prevent Sydney becoming choked with cars under the current predictions for population growth.

A raft of recent NSW Government strategies supports the development of a network of safe cycleways, separated from vehicles:

The Future Transport 2056 Plan (2018)^{xxxiii} outlines an overarching vision for transport in NSW guided by community desire for better places. Future Transport 2056 commits to providing a regional cycle network in Greater Sydney, known as the Principal Bicycle Network (PBN). A coordinated delivery of protected bike lanes across the metropolitan area will ensure that routes across council boundaries align and create the most direct path of travel, to ensure walking or cycling is the most convenient option for short trips around urban centres and local areas. Future Transport 2061 is currently being prepared following stakeholder consultation and will put an even greater emphasis on sustainable mobility.

Greater Sydney Region Plan, A Metropolis of Three Cities (2018)^{xxxiv} and South District Plan (2018)^{xxxv} both set out how integrated land use and transport planning can help achieve the 30-minute city "*where most residents live within 30 minutes of their jobs, education and health facilities, services and great places*".

Increased liveability will be delivered by focusing on active transport, with a network of green corridors that improve accessibility, connectivity and amenity for pedestrian and cyclists.

Sydney Green Grid^{xxxvi}, developed by the NSW Government Architect in 2017 and reflected in the district and region plans, proposes an interconnecting network of open spaces that support walking and cycling. Sutherland Shire is covered by the South District document which identifies the Sutherland to Cronulla Cycleway and Pedestrian Link as a key project opportunity.

The latest, and most exciting, document to be published by Transport for NSW, under the direction of Minister Stokes, is the Eastern Harbour City Strategic Cycleway Corridors^{xxxvii}. 30 strategic corridors have been identified for eastern Sydney, making up approximately 250 km of cycle network. The corridors will form the backbone of the Principal Bicycle Network. The Eastern Harbour City was the first of the 6 cities of the newly-defined sandstone megaregion to receive a cycleway corridors plan in April 2022: the other cities will follow by the middle of 2023. The Sutherland to Cronulla route will undoubtedly be identified as a strategic corridor that requires safe, direct infrastructure to support high volumes of bike riders.

Of course, Sutherland Shire Council has a suite of strategic plans which all highlight the importance of SCATL as a major east-west off-road 'spine' route through the Shire.

The rail corridor has been identified on Council bicycle network plans since the 1990s. It is not true, as claimed by the 2021 REF, that the proposed Stage 2 aligns with Councils 'existing and proposed bicycle network'; it picks up elements of the local network but does not reflect the long-planned regional route^{xxxviii}.

The problem with shared paths

In 2021, Transport for NSW adopted its Cycleway Design Toolbox^{xxxxix} which sets out standards for a cycling network that is safe, connected, direct, attractive, comfortable and adaptable. It highlights that 'direct routes should provide bicycle riders with the shortest and fastest way of travelling from place to place, measured in both time (effort) and distance'.

Where cycle infrastructure is provided in road corridors, there is a choice of treatments. The Cycling Design Toolbox clearly states that **shared paths on the footpath are not suitable for priority routes** in the cycling network. They provide a low level of service and are best suited for off-road environments, where the minimum width should be 4m to allow overtaking.

Shared paths are not recommended in locations with high levels of pedestrian and bicycle activity, places where pedestrians and bicycles intersect, such as entrances to schools, rail interchanges or busy pedestrian crossings, routes attracting higher-speed commuting cyclists, or routes crossing numerous driveways or side streets.

Despite this, shared paths in the form of widened footpaths have been the preferred option for most councils, ever fearful of upsetting drivers by reallocating road space for bicycles. Negative outcomes include:

- well-documented conflict between people walking and cycling, which will get worse as population and active travel increase.
- the loss of verges, vegetation and, in some instances, mature trees
- an overall increase in asphalt and hard landscaping, amplifying issues with urban heat and stormwater management.
- the uncomfortable pinch points caused by bus stops, power poles and retained trees
- constant interruptions when crossing side streets where vehicles effectively have priority.
- poor sightlines for approaching bike riders for motorists exiting driveways, compromising safety.

Importantly, no attempt is made to change the dial on car use when bicycles are squeezed into pedestrian spaces. By leaving the road between the kerbs as the unchallenged domain of private cars, with wide vehicle lanes and ample parking, car travel is encouraged, unsafe speeds are common and the modal shift needed to meet climate, health and liveability imperatives may not occur.

Shared paths adjacent to arterial roads have value in delivering local connections to destinations such as schools, hospitals and town centres if adequate widths can be achieved. However, SCATL was always envisioned as a 'spine' route to which local routes will connect as the network is developed.

It is not acceptable for the majority of SCATL Stage 2 to be shared paths with a width of just 2.5m.

The path will not cope with conflict between pedestrians and cyclists, or cater for future growth in ridership or accommodate innovative and emerging forms of micromobility such as cargo bikes, e-bikes and e-scooters which travel at higher speeds. In some areas, separated cycleways are proposed but not where separation is most needed, in high activity areas such as the southern side of Kingsway between Wandella Road and Jackson Avenue.

For most of the route, Transport for NSW claims that there is insufficient space to provide separated paths for walking and cycling (Stage 2 Submissions report, p. 20). This completely disregards the possibility of reallocating the generous space currently occupied by private vehicles in the Shire.

Moving forwards

Bicycle NSW is pleased that the delivery of SCATL is being prioritised after two decades of community advocacy. We accept that compromise will be necessary to achieve a continuous off-road cycleway between Sutherland and Cronulla. As Minister Stokes has said, it is important that ‘the perfect does not become the enemy of the good’. The key task for local and state governments is to build out a cycling network quickly within the constraints of the dense and contested urban fabric so that more people can enjoy the benefits of active transport.

However, we concur with Sutherland Shire Council that it is wrong to abandon the entire rail corridor route^{xi}. The current decisions being made for SCATL will not deliver the mode shift that Council and State strategies wish to see. Narrow shared paths are far from adequate for a principal route. The ‘preferred alignment’ will not result in a regional cycleway that will make a serious contribution to mobility in the area as population increases by around 41,000 people over the next 20 years.^{xii}

SCATL must once again be considered a ‘spine’ route to which local connections can be made.

We respectfully request that Transport for NSW:

- Reviews all options for returning the majority of the SCATL route to the rail corridor
- Reallocates road space from vehicles where SCATL lies within the road reserve

Review all options for returning SCATL to the rail corridor

- **Collaborate with Council to survey the entire corridor**

Council has been looking at route options for SCATL for nearly two decades. It is essential to listen to its expertise. The cross-section of the rail corridor presented to the community by TfNSW (Figure 7) represents the worst-case scenario for fencing and retaining walls. It is clear from our site inspections that there is a wide, level and stable strip of land along most of the corridor that can be cost-effectively converted to a cycleway, often with only minor fencing relocation. It is dishonest to claim that an ‘infrastructure-heavy’ design is needed in all locations.

Council has indicated that it is very flexible and supports a hybrid approach to maximise the use of the rail corridor in combination with existing green corridors and back street networks^{xliii}. A careful and collaborative design process that takes full advantage of local knowledge is essential to get the best outcome.

- **Consider a cycle-only SCATL for constrained sections of the rail corridor**

Where it is determined that the rail corridor cannot accommodate a best-practice 4m wide shared path, Bicycle NSW suggests installing a 2.4m wide cycle-only path. Pedestrians already have a parallel network of reasonable footpaths that don’t need to be replicated if there is not space. Note that 2.5m is considered by TfNSW to be adequate for a shared path along Kingsway but apparently a 3.5m path would be needed in the rail corridor, triggering the need for high-cost retaining walls. This double standard reinforces concerns that the rail corridor is being discounted for valid reasons.

- **Examine the cost and feasibility of at-grade road crossings**

The options appraisal in the SCATL Stage 2 REF^{xliii} dismissed the rail corridor option in part because of the complexity of constructing 3 bridges (at Sylvania Road, Kiara Road and Gannons Road) and one underpass (at GyMEA Bay Road). These would be expensive and very time-consuming to design and deliver. However, Bicycle NSW believes that road crossings can be at-grade with new raised or signalised pedestrian and cycle crossings. In most locations, access to the rail corridor from the road already exists and is used by maintenance vehicles. User of SCATL would experience very minor inconvenience crossing these roads, especially when compared to the delays navigating the numerous major intersections, side roads and driveways using current Stage 2 proposal. Connectivity with neighbouring suburbs and destinations would be improved by at-grade crossings. Bridges could be added later when justified by growth in ridership.

- **Costings must be made transparent**

It is assumed by the community that the real reason for discounting the rail corridor option is cost. However, Bicycle NSW believes that the in-corridor SCATL could be cheaper to deliver, particularly if no bridges or underpasses are included. It is essential that detailed costs for each section are set out clearly in the public domain by the project team. All the different options under consideration must be included in a cost matrix – i.e. bridges/underpasses or at-grade road crossing, an in-corridor or road reserve location, 2.5m cycle-only path or best-practice 4m wide shared path, additional entry and exit points. With accurate data to inform decision making, the community will feel comfortable that the correct choices are being made for SCATL. Failing to provide a transparent business case will contribute to community mistrust and objections in the face of a broken election promise.

Implement road space reallocation for on-road sections

Where SCATL or its feeder routes sit in the road reserve, Transport for NSW and Sutherland Shire Council must initiate discussions with the community about reallocating road space from private cars to reflect the priorities set out in the Road User Space Allocation Policy CP21000^{xliv} and Council's own policies.

It is clear from Bicycle NSW's site visit that Sutherland has generous wide roads and unrestricted parking. We do not support removal of trees or landscaped verges to create safe space for bike riding when there is plenty of asphalt available between the kerbs.

In our recent meeting, the Minister for Active Transport, Rob Stokes MP, stated his preference for properly separated walking and cycling infrastructure^{xlv}. He expressed his strong belief that **the road-related environment is a public asset** that must be shared equitably between all road users. Any increase in inconvenience to car drivers, created by reducing road space for driving and parking private vehicles, will incentivise the mode-shift that Transport for NSW and Council seek. This will benefit local residents with quieter streets, and less pollution, noise and through-traffic.

- **Construct separated bicycle paths along main roads**

Space for separated cycle infrastructure within the road reserve can be found by reducing the number of vehicle lanes, removing slip lanes, turning lanes or parking lanes, or narrowing existing lanes. Separated bicycle paths have many advantages over shared paths:

- People riding bikes are separated from pedestrians and vehicles, reducing conflict.
- Street trees and green verges are not impacted.
- The narrower or reduced vehicle lanes will slow traffic, reducing noise and improving safety for all road users.
- No additional asphalt is required, reducing issues with urban heat and stormwater drainage.
- Sufficient space is created to enable a significant modal shift to active transport.
- New landscaping and important pedestrian safety features such as kerb extensions can be incorporated into the buffers and the parking lanes.
- The bicycle paths can be prioritised over driveways and minor road intersections.
- Motorists exiting driveways have a better sightline to approaching cyclists, improving safety.

It may seem unimaginable to take space from private vehicles on an established arterial road such as Kingsway. However, similar work is being undertaken by Transport for NSW on King Street at Sydney Park Junction. The proposals will see driving lanes reduces from 6 to 4, speed limits lowered to 40km/h, new separated bicycle paths, widened pavements and new landscaping. This project provides exciting evidence that the city can move forward from decades of car domination and sets a precedent for better place outcomes throughout Sydney. Changing the dial on how we measure the success of a movement corridor will have huge implications for reimagining arterial roads.

Bicycle NSW wrote a detailed [submission](#) in October 2021 to support the upgrades at Sydney Park Junction.

- **Develop quietways along local roads**

Each element of SCATL and its feeder routes will need a site-specific solution. An alternative to separated bicycle paths, only suitable for local streets with low traffic volumes, is a shared space ‘bicycle boulevard’ or ‘quietway’ where traffic calming interventions ensure slow vehicle speeds and reduce vehicle movements to less than 2000/day. Most bike riders will feel safe using the vehicle lanes if traffic speeds and volumes are low.

The quietway treatment is officially endorsed by Transport for NSW in the Cycleway Design Toolbox; please refer to Section 3.3 for more information.

The Western Australian Department of Transport has rolled out several ‘bicycle boulevards’ using residential streets as part of its Safe Active Streets programme^{xlvi}. In addition to a 30 km/h speed limit, a range of physical interventions support slower speeds and reduce traffic volumes and rat running.

30 km/h has been shown as an optimal speed limit to allow people driving and cycling to share the road safely^{xlvii} and is becoming a standard speed limit in many parts of the world. All single lane roads in Spain have been under a 30km/h limit since May 2021 and 30% of UK residents live in 20mph areas^{xlviii}.

Lower speed limits are an important building block for Vision Zero, an approach to road safety that was launched in Sweden in 1994 with the simple premise that no loss of life is acceptable. The Vision Zero approach has been highly successful and has spread to many other countries. The key policies include prioritizing low urban speed limits, pedestrian zones, physical separation between bicycle and car traffic, data-based traffic enforcement and behaviour-change education^{xlix}.

- **Remove on-street parking where required**

Removal of street parking will be required in places to create safe raised crossings, wide shared paths and separated bicycle paths. Council must be strong when faced with resident opposition. On-street parking is fundamentally the storage of private property in the public domain. It makes driving easier and generates car trips. When on-street parking is prioritised over safe cycling, active transport for the whole community suffers.

Studies show that parking spaces in commercial areas are less significant for customers than many businesses expect, with owners overestimating the proportion of customers arriving by car by a factor of 3ⁱ. Visitors themselves overwhelmingly prefer widened footpaths, even if it means sacrificing some parking spaces. Cyclists and pedestrians are better customers, spending over twice as much time in the area and 40% more money per month than people driving. A report from London showed that improvements to the public realm to enable safer walking and cycling lead to a 30% increase in tradeⁱⁱ.

A parking survey can be useful to determine precise usage patterns for on-street parking. With accurate data to reflect on, the community may find it easier to accept the loss of parking to allow the installation of a best-practice bicycle path which benefits the wider community.

- **Trial road changes with pop-ups**

Many councils, including Randwick, Parramatta and City of Sydney, have installed pop-up cycleways to expand the network quickly. These lanes have demonstrated the importance of physical separation to the usability of bike infrastructure, while showcasing less expensive ways to provide it (Figure 9). Permanent changes to kerbs, parking and landscaping can then be made when funds allow.

Bicycle NSW has drawn together the relevant standards, policies and resources on our [website](#) and we are happy to support Council's efforts to test and implement cycle paths and new treatments.



Figure 9: Pop-up infrastructure in Sydney (Source: Bicycle NSW / Randwick Today)

Conclusion

As Sydney adapts to the imperative to reach Net Zero, the construction of active transport infrastructure is essential to allow a rapidly growing population to move through the city in a low-impact, efficient and healthy way.

However, the community is very concerned that SCATL Stage 2 will not deliver optimal outcomes. The alignment proposed by Transport for NSW is less safe and less direct than the rail corridor option, less convenient due to the many crossings and steep gradients, and less pleasant. There is a serious risk that the resulting SCATL will be poorly used and add fuel to the anti-cyclist lobby's arguments that bike riding infrastructure is a wasted investment.

There are cheaper, simpler, safer and more direct solutions that combine road and railway corridors. The community and Sutherland Council have a deep understanding of local needs and conditions, as reflected in the feedback provided to date. Close collaboration is now required to find the best solution for each section of SCATL.

Transport for NSW is asked to establish a community reference forum to assist with the finalisation of the route and design for SCATL Stage 2. The forum should be comprised of key stakeholders such as community group representatives, Bicycle NSW, Sutherland Shire Environment Centre, local MPs, Transport for NSW representatives and Council staff. Input from all members of the forum will enable a smoother and potentially more expeditious resolution of the design challenges in each section.

In addition, Bicycle NSW supports Sutherland Shire Council's request that TfNSW develops the western part of SCATL Stage 2 between Oak Road and Sylvania Road in advance of the eastern section that is currently slated to go firstⁱⁱⁱ. The west section lies in or close to the rail corridor and aligns with the route proposed in 2015/2016 REF that has widespread community support. It would add value to the complete Stage 1. Many of the issues and concerns that TfNSW have raised about using the rail corridor can be tested here before any further commitment to the out-of-corridor option is made.

Bicycle NSW looks forward to detailed involvement in the next steps of the design process.

Appendix A: On the ground observations

Bicycle NSW undertook a visit of the area with staff from Sutherland Shire Council in July 2022. Travelling from Sutherland to Woolooware, the in-corridor and on-road route options were assessed for all section of the SCATL.

Council is still committed to the rail-corridor option along most of the route^{liii}. It is clear from the photographs and observations by Bicycle NSW that this has been unnecessarily discounted by TfNSW

The overview maps show the route announced by TfNSW in June 2022 with locations of the comments and images marked in yellow.

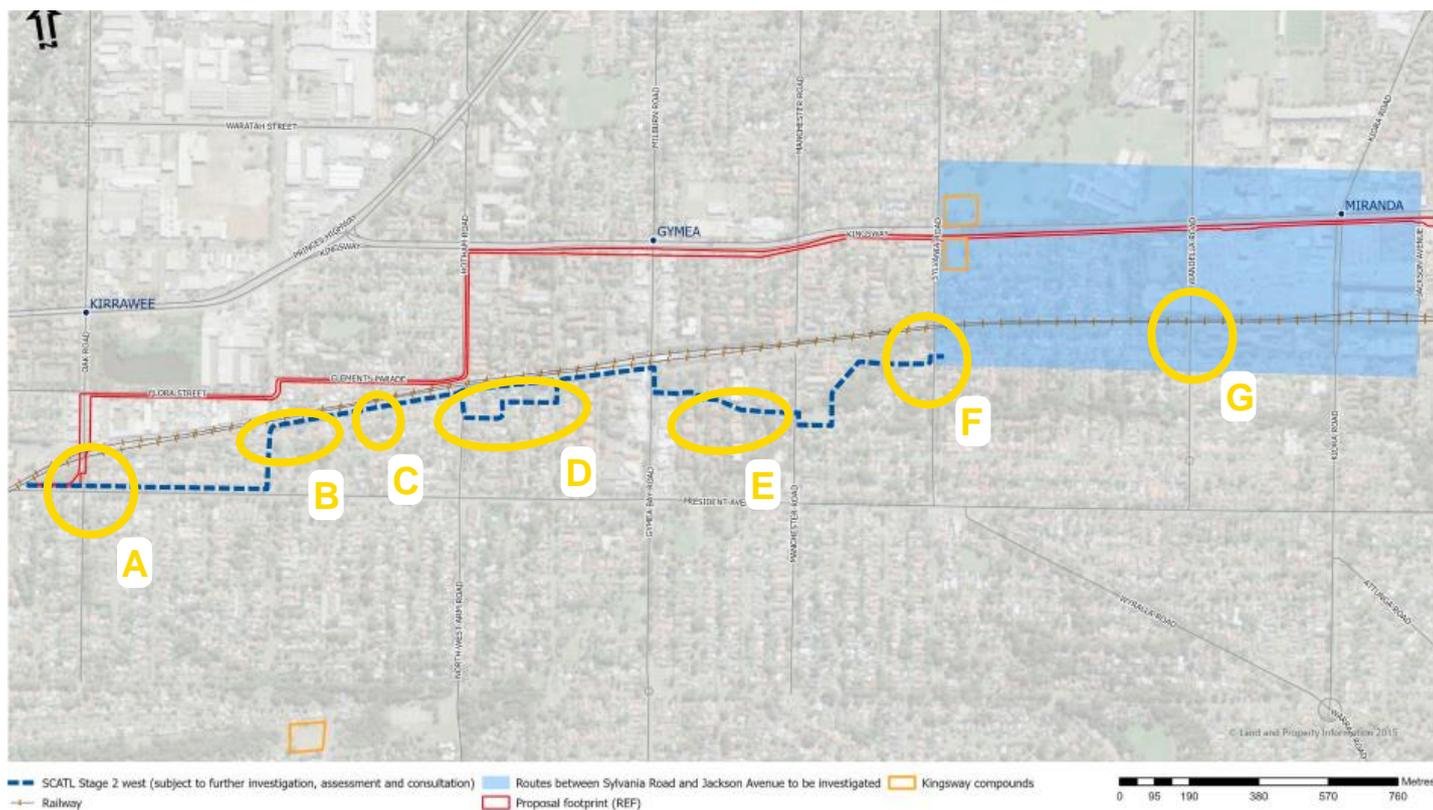


Figure 10: SCATL Stage 2 West from the June 2022 Submissions Report showing the sections that will be subject to further investigation and consultation. Yellow circles mark the areas discussed on Bicycle NSW’s site visit with SSC (Source: TfNSW/Bicycle NSW)

Location A: Oak Road

East of Oak Road, SCATL is slated to continue on President Avenue as a shared path. There are numerous driveways and many trees that will need to be removed.

Sutherland Shire Council has bought land at 168 Oak Road to construct a 2000sq.m park^{liv} (Figure 11). There is now a fantastic opportunity to take SCATL through park and into rail corridor. Access to rail corridor is level and straightforward, 100m down from Oak Road where a wide level area begins just east of Kirrawee Station. If necessary, SCATL in this section of the rail corridor could be constructed as a construct as a 2.5m cycle-only path. Pedestrians can remain on President Avenue.

It would then make sense for the existing footpath alongside the rail line in Pollard Park to be widened to form a best-practice shared path. This would take SCATL away from the busy and hazardous intersection of President Avenue and Oak Road which is due to get worse with construction of a new vehicle turn lane. A new pedestrian/cycle crossing would be required on Oak Road.



Figure 11: Oak Road images (Source: Bicycle NSW/Sutherland Shire Council)

Location B: Avery Road

The TfNSW proposal takes the shared path north from President Avenue along Bath Road and then onto Avery Road which lies adjacent to the rail line.

A shared path on Bath Road is supported to create local route that connects a ‘spine’ SCATL with destinations such as Kirrawee HS and the F6 corridor paths to the south. However, it is not appropriate as part of a regional route.

On Avery Road, it is proposed to remove mature trees to create a shared path in the verge. Bicycle NSW is very concerned about such an unnecessary loss of tree canopy. As shown in the photos in Figure 12, the rail corridor here has a very wide flat glassy area level with the tracks. Moving the fence north by 1.5-2.0m would allow the construction of a bicycle path without losing trees.

A low chain link fence currently separates the road from the rail corridor. Presumably a higher fence would be installed if this is replaced but there is certainly no need for an ugly security fence or the concrete retaining walls that TfNSW claim (Figure 7) will be needed to install SCATL in the rail corridor.

Alternatively, if it is decided that SCATL will lie within Avery Road, reallocation of road space must be considered instead of concreting over the verge and removing trees. There is low demand for parking here and all houses have off-street parking. It would be much better to narrow the lanes or remove the parking and build a best practice bicycle path or shared path on the south side of the retained trees.

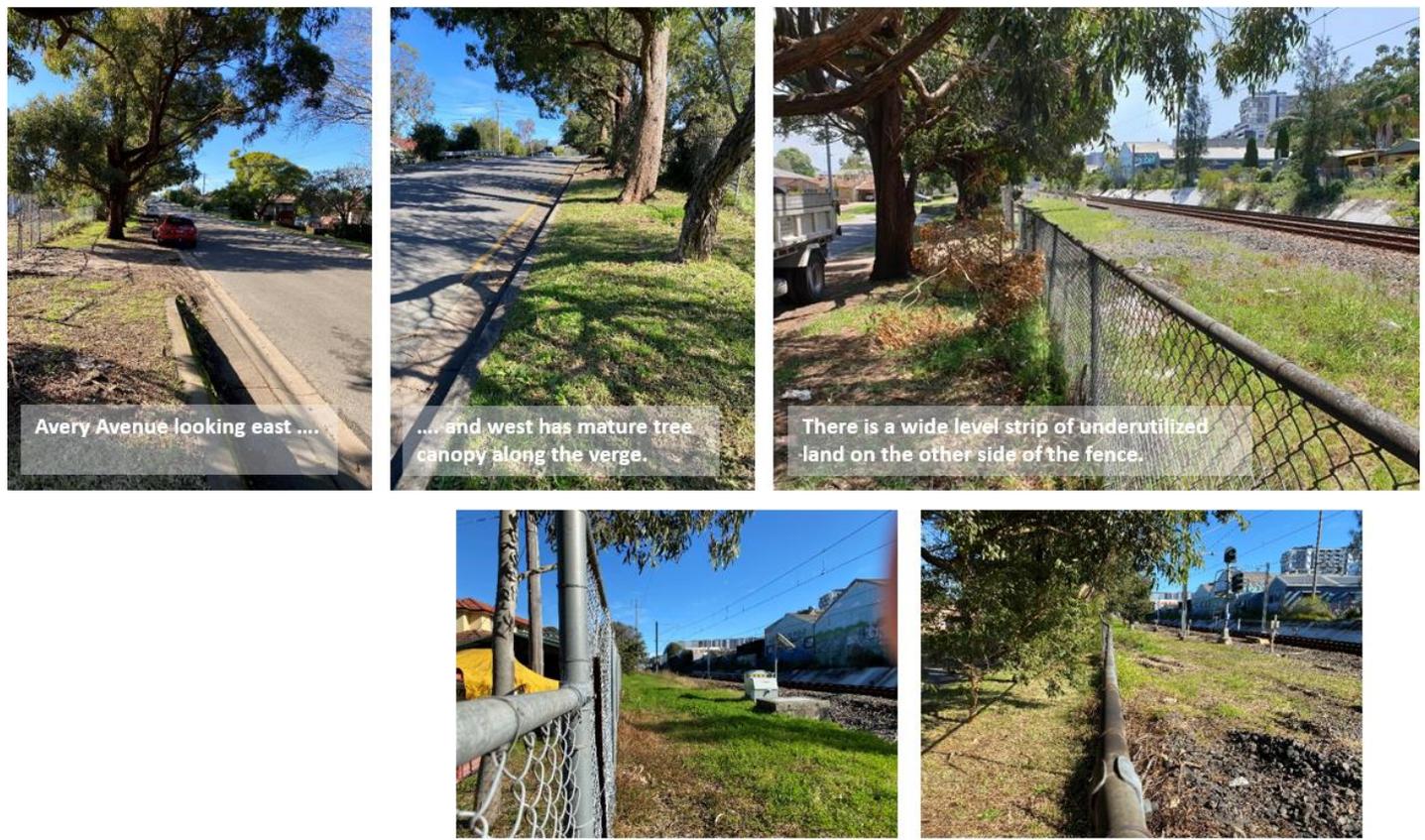
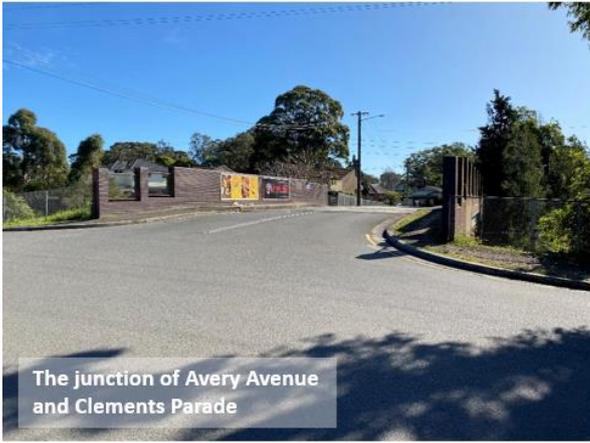


Figure 12: Avery Road (Source: Bicycle NSW)

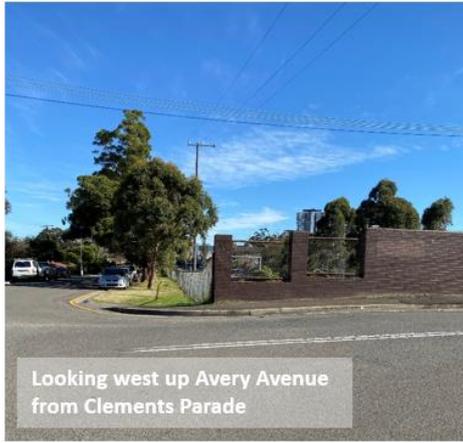
Location C: Clements Parade

Bicycle NSW suggests bringing SCATL back to the road corridor to cross the Clements Parade bridge, eliminating the need to interfere with the brick structure to build an underpass. The pedestrian environment is extremely poor at this junction (Figure 13) and a much-needed full upgrade of the intersection could integrate a cycle crossing.

As at many other points along the rail corridor, at-grade road crossings are a lower cost option than underpasses and bridges but this has not been explored in the feasibility study presented to the community.



The junction of Avery Avenue and Clements Parade



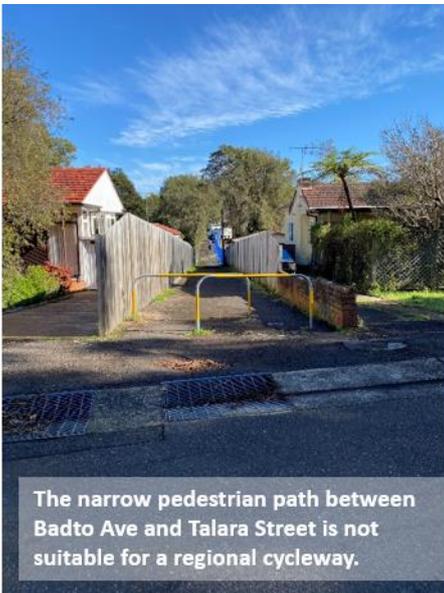
Looking west up Avery Avenue from Clements Parade

Figure 13: Clements Parade junction (Source: Bicycle NSW)

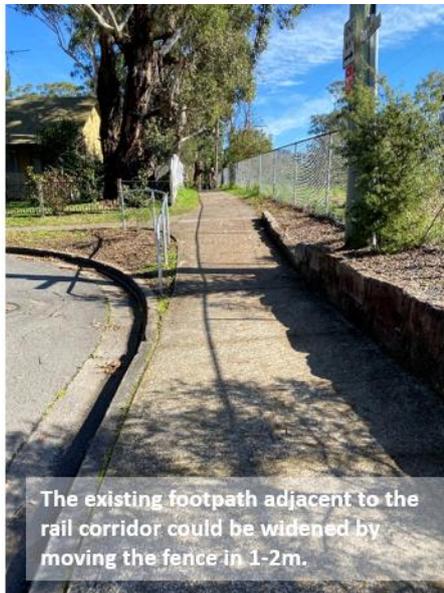
Location D: Hotham Road to Talara Road

The use of the narrow pedestrian link from the end of Badto Avenue has been broadly rejected by the community. There is not enough space to create a wide shared path that is suitable for a regional route (Figure 14). Bicycle NSW is delighted to see that Transport for NSW will investigate the rail corridor option for SCATL in this section. We support advancing this design work immediately as it would set a useful precedent for other parts of the corridor.

The SCATL can then follow an existing shared path along the rail fence to Gymea Bay Road. By moving the fence into the rail corridor by 1-2m, the path can be widened to ensure best-practice width.



The narrow pedestrian path between Badto Ave and Talara Street is not suitable for a regional cycleway.



The existing footpath adjacent to the rail corridor could be widened by moving the fence in 1-2m.



The wide, level grassy area inside the between the fence and the train tracks can be seen clearly



Figure 14: The section between Hotham and Gymea Bay Road

Location E: Gymea Bay Road to Sylvania Road

The use of existing green open space corridors east of Gymea town centre (Figure 15) is supported here, widening the series of pedestrian paths and adding raised street crossings. Turning north into the F6 corridor, SCATL can re-join the rail corridor at the end of Paddison Avenue.

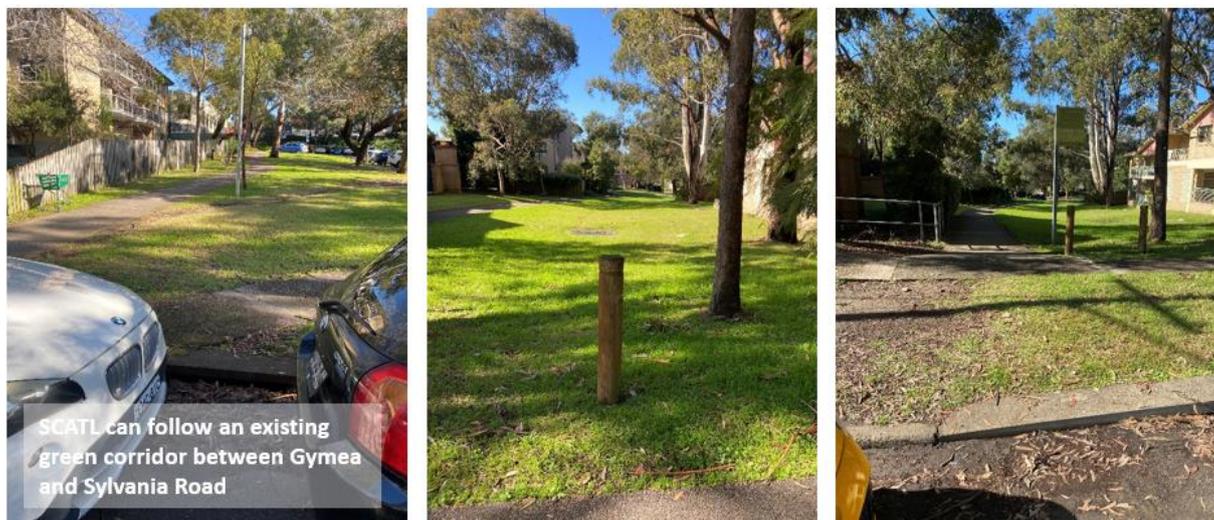


Figure 15: The existing open space network east of Gymea town centre (Source: Bicycle NSW)

Location F: Sylvania Road

The expense of providing a pedestrian/cycle bridge at Sylvania Road was given as a reason to discount the rail corridor option in this section. However, Bicycle NSW would prefer to bring the path out to street level and create a safe at-grade crossing. This would provide simpler connectivity to adjacent residential streets and local destinations. Access from the road already exists (Figure 16) in both directions. Tyre marks show that trucks can enter the rail corridor for maintenance – there must be a sufficiently wide and stable embankment for bicycles.



Figure 16: Access to the rail corridor at Sylvania Road (Source: Bicycle NSW)

Location G: Miranda

TfNSW has committed to further exploring options for the section of SCATL between Sylvania Road and Jackson Avenue. Karimbla Road has been considered for a shared path but this has been unpopular with stakeholders due to driveways, powerpoles and obstructions. Bicycle NSW is very concerned that TfNSW will return to the Kingsway option but this is a particularly congested space that will not provide safe conditions for either walking or cycling.

Again, we urge that the rail corridor is properly considered, with at grade crossings of roads to reduce costs and increase permeability with the local network.

The view from the deck of the Westfield car park over Wandella Road shows that there is a wide embankment along this stretch (Figure 17). The underpass of Wandella Road is already existing; there would be no major expense to use this. There are several options that can be explored for a ramp to the road for access to Westfield, Miranda Library, Miranda PS and Port Hacking HS.

There is considerable level difference from the rail tracks to the embankment in this location. It is assumed that the cross section provided by TfNSW to justify discounting the entire in-corridor SCATL (Figure 7) is derived from this worst-case situation. As discussed, Bicycle NSW proposes a 2.5m wide cycle-only path along this section to potentially eliminate the need for concrete retaining walls. Trucks already access the corridor for maintenance. Bicycle NSW does not concede that it is unsuitable for bicycles.

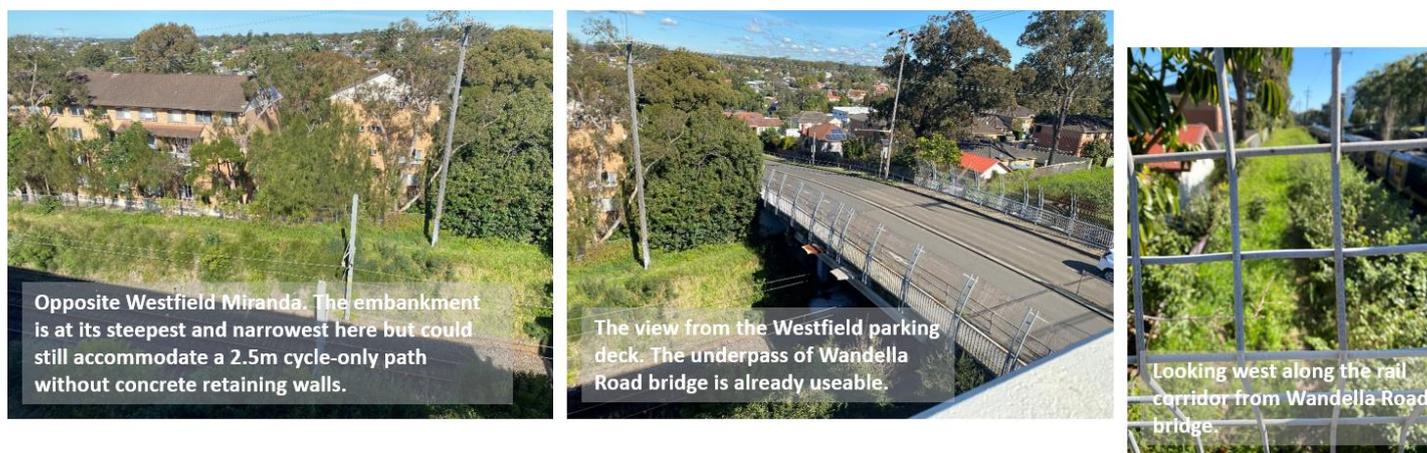


Figure 17: The view from the Westfield Miranda parking deck over the Wandella Road bridge (Source: Bicycle NSW)

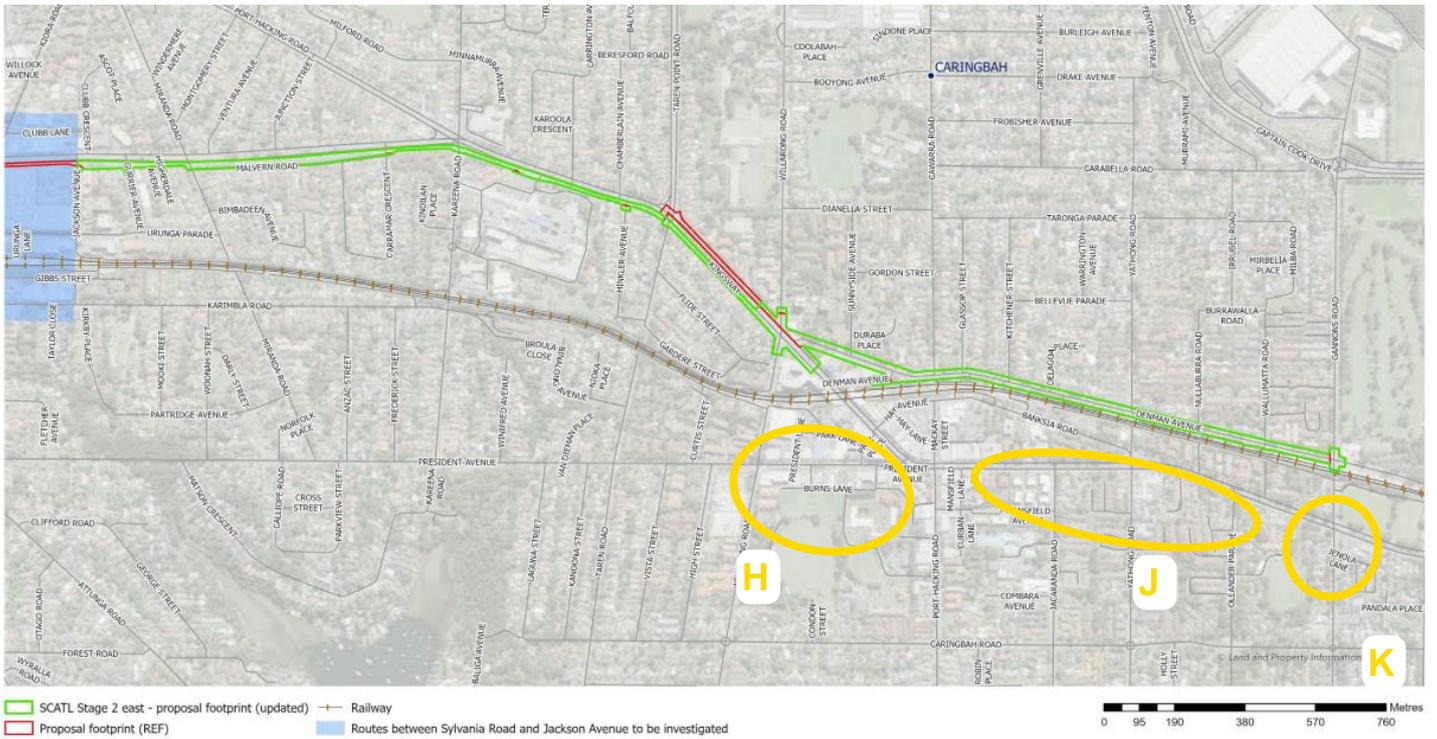


Figure 18: SCATL Stage 2 East from the June 2022 Submissions Report showing the footprint of the route on Kingsway, Banksia Avenue and Denman Ave. Yellow circles mark the areas discussed on Bicycle NSW’s site visit with SSC (Source: TfNSW/Bicycle NSW)

Location H: Caringbah

Maintaining the path along the south side of the rail corridor is feasible. Again, inspections during the site visit revealed a wide, generous and level grassy strip adjacent to the tracks. At Willarong Road, SCATL could join the network of existing back lanes to the west of Kingsway to access Caringbah Town Centre. Note that fence has been pushed very close to the tracks to widen Willarong Road behind Coles, appropriating land in the rail corridor (Figure 19). This surely sets a precedent for the use of the corridor elsewhere.



Figure 19: views of the rail corridor in the Caringbah section (Source: Bicycle NSW)

Location J: Denman Avenue

From Caringbah, Bicycle NSW would prefer SCATL to remain in the rail corridor south of the tracks.

However, Denman Avenue (Figure 20) does provide a reasonable direct alternative. As with Avery Avenue, current plans will see all trees removed on the south side of the street and the verge concreted over. Again, it is essential, in line with the Road User Space Allocation policy, to rethink this – narrow the vehicle lanes or remove most of the street parking, save the trees and build a generous bicycle path or shared path to the north of the trees.

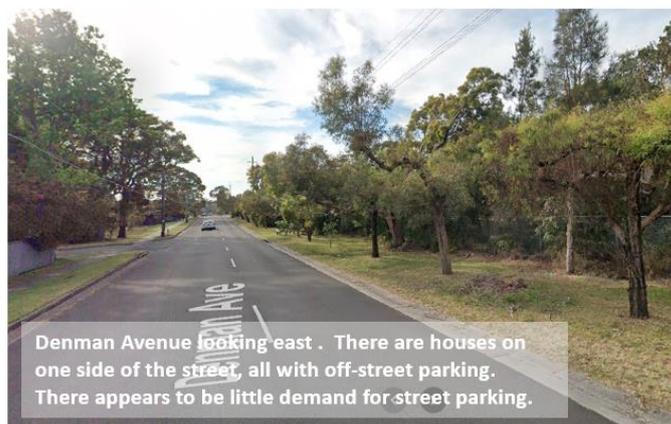
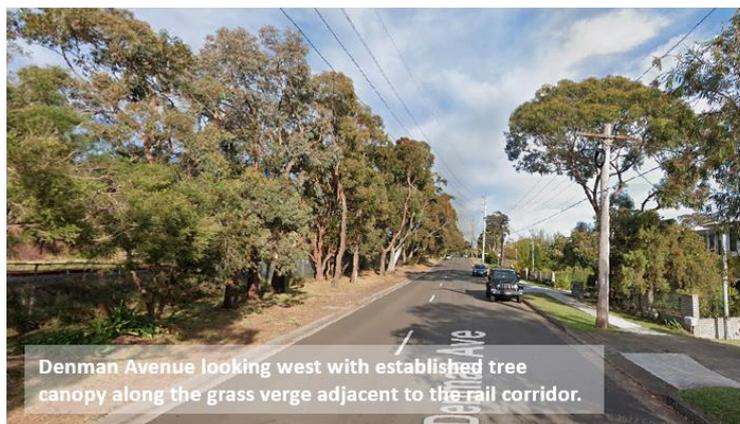
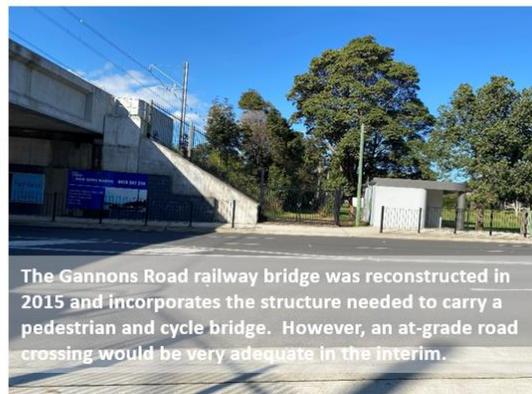


Figure 20: Denman Road looking west and east (Source: Bicycle NSW)

Location K: Gannons Road

SCATL Stage 2 is set to end at Gannons Road (Figure 21), where a major shared path heads north to the Woolloomooloo shoreline and south to Burraneer. Transport is currently very silent on plans to continue SCATL to Cronulla.

Bicycle NSW supports an at-grade road crossing of Gannons Road. In line with other road crossings, easy access to the rail corridor already exists. It is important to note however that the railway bridge here was re-built in around 2015 with structural provision to carry an active transport bridge adjacent to the tracks.



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