

Parramatta Light Rail
Level 10, 130 George Street,
Parramatta NSW 2150

parramattalightrail@transport.nsw.gov.au

12th December 2022

Dear Parramatta Light Rail team,

Re: Parramatta Light Rail Stage 2 EIS

Thank you for the opportunity to comment on the plans to deliver active transport infrastructure as part of Parramatta Light Rail Stage 2 (PLR2).

Bicycle NSW has been the peak bicycle advocacy group now 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’, and we support improvements to facilities for pedestrians and cyclists. We advocate for new cycling routes that incorporate dedicated paths within both green corridors and the road environment, to 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.

The Parramatta Light Rail Stage 2 (PLR2) will provide a vital link for the rapidly growing communities in and around Parramatta. Bicycle NSW is very supportive of the project and its ambition to ‘bring the vision of a ‘30-minute city’ closer to reality’ by connecting local communities to the north and south of Parramatta River to the CBDⁱ.

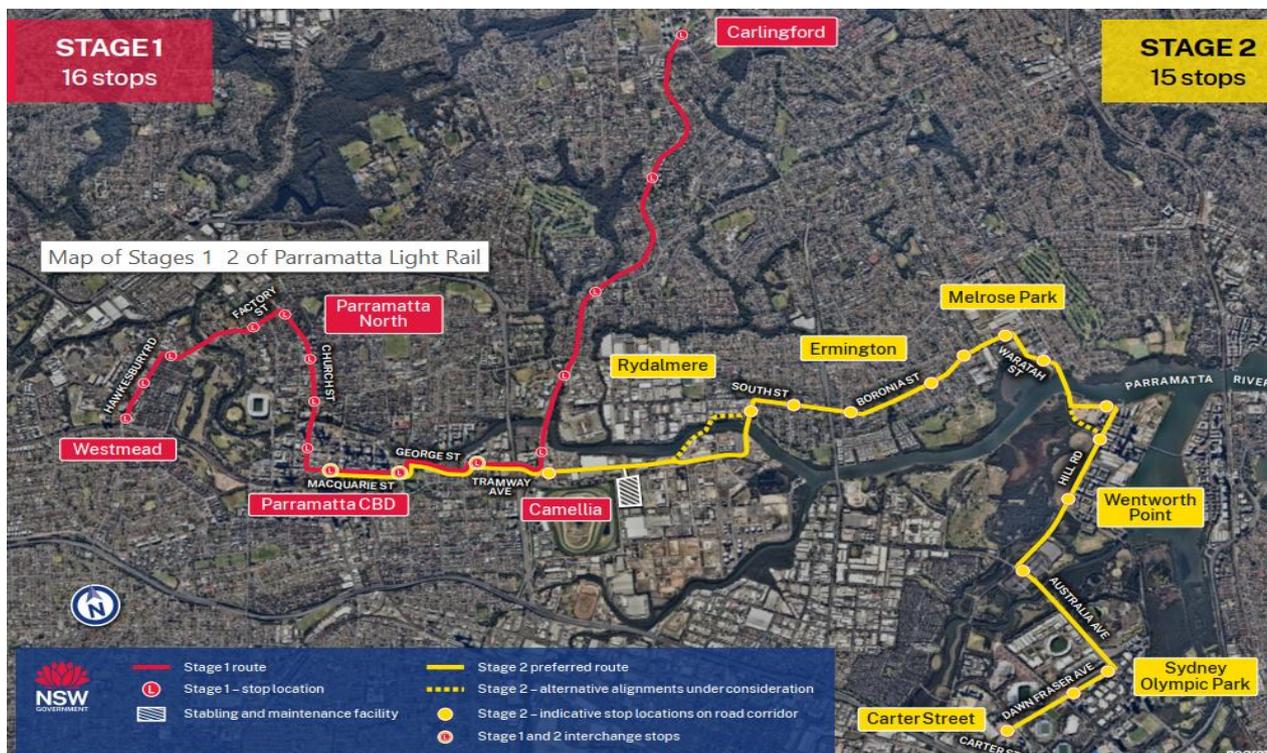


Figure 1: Map showing stages 1 & 2 PLR and the proposed stopsⁱⁱ (Source: TfNSW)

The EIS describes the social and environmental impacts that could arise in relation to traffic, parking, noise, heritage, property acquisition and sustainability, both during and after construction. We are impressed by the level of detail provided at this stage. It is beyond the scope of this submission to dig deep into every aspect of the project but we have faith that Transport for NSW has applied the multitude of learnings from the design and construction of Parramatta Light Rail Stage 1 and Sydney, Eastern Suburbs and Inner West light rail projects to minimise impacts on the community and maximise outcomes. Bicycle NSW made numerous submissions about the [disruption of pre-existing cycling routes](#) by PLR1, and the [lack of care taken to keep bicycle riders safe](#). We will monitor this project closely and work with our stakeholders to raise any concerns with the project team.

This submission will focus on the new walking and cycling facilities that will be delivered alongside the PLR2. We would like to thank the PLR2 team for their assistance in understanding this project and Charlene Bordley of CAMWEST for her knowledge and advice.

The Active Transport Link:

Bicycle NSW congratulates the Parramatta Light Rail Stage 2 team on its ambition to include an Active Transport Link (ATL) along the light rail corridor, building on the 5.7 km shared path delivered with Parramatta Light Rail Stage 1.

The new 8.5km ATL (Figure 2) between Camellia and the Carter Street precinct will run parallel to the light rail tracks and connect to existing and proposed active transport networks in the City of Parramatta and City of Ryde. The ATL will fill gaps in the existing network, support access to light rail, train, bus and ferry stops, and provide enhanced opportunities for increased movement and activity. The proposed facilities provide alternatives to existing active transport routes that experience congestion, adding essential capacity to the network.

The new light rail and active transport bridges are particularly exciting. The bridges will deliver two vital connections over the Parramatta River, linking Rydalmere to Camellia, and Melrose Park to Wentworth Point. Is it fantastic that early funding has been secured to design and deliver the Wentworth Point Bridge well in advance of an operating PLR2. This bridge will hugely improve active transport links in the Parramatta growth area by connecting the Parramatta Valley Cycleway with Wentworth Point, Rhodes and Olympic Park. New walking and cycling 'loops' will be created to encourage active lifestyles and attract both residents and visitors.

Bicycle NSW has reviewed Tech Paper 1: Design Place and Movementⁱⁱⁱ, taking a particular interest in the light rail corridor cross sections in Chapters 5-12.

The project is designed to fit mostly within existing road corridors. The insertion of light rail into the road network is a **significant urban design proposition** that will rebalance the use of our streets. The transformation of streets by reallocating road space from the movement and storage of cars to create landscaped multi-modal public spaces is a very encouraging step forward for place-making in Western Sydney.

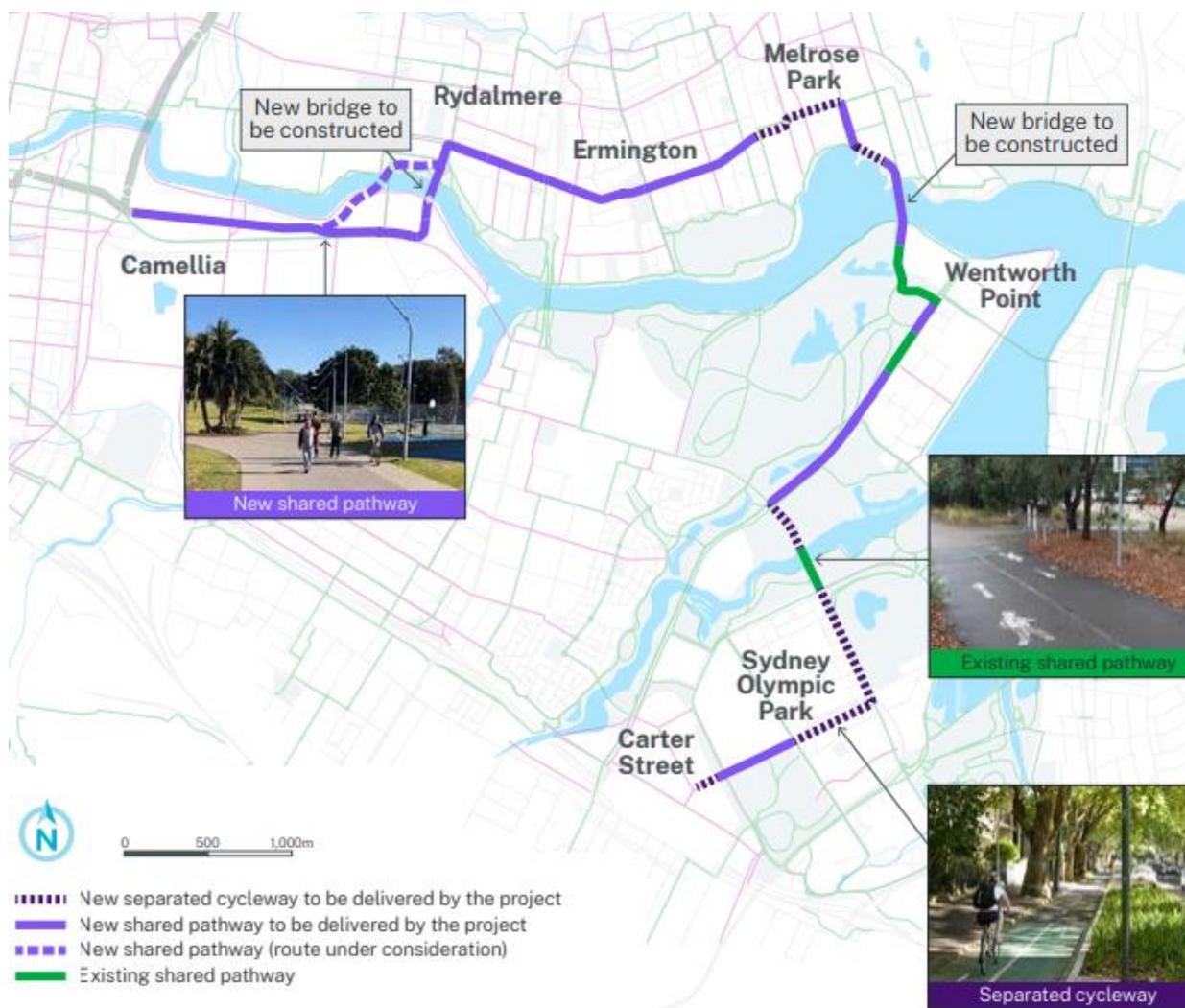


Figure 2: A diagram showing the route of the PLR2 ATL and the proposed treatments (Source: TfNSW)

It is fantastic to see the determined application of two important policies, published by Transport for NSW in 2021, that require NSW Government projects to prioritise road space for active transport:

- Road User Space Allocation Policy CP21000^{iv} establishes a road user hierarchy that considers pedestrians first and private cars last. Multiple environmental and health benefits will flow from increased walking, cycling and public transport use. The streets will be more equitable for Sydneysiders of all ages, incomes and abilities.
- Providing for Walking and Cycling in Transport Projects Policy CP21001^v requires every transport project funded by Transport for NSW to include provision for walking and cycling, which must be delivered from the outset of the project. The policy applies to anyone planning, designing, delivering, building or managing a transport project or asset for, or on behalf of, Transport for NSW.

It is clear that the project design team has worked hard to deliver good outcomes for public and active transport. Sufficient space has been found by removing parking and vehicle lanes to accommodate walking, cycling, light rail tracks and landscaping. Shared user paths are generally wide enough to separate pedestrian and cyclists, and segregated bicycle paths are provided in some sections of the ATL.

Our key concerns:

We have ongoing concerns that PLR1 excludes bicycles from large parts of the Parramatta CBD, as discussed in previous [submissions](#). This undermines the great good that can be achieved by the transformation of traffic sewers into multi-modal transport corridors, and it is at cross purposes with the project aims and supporting documentation. **We hope that these anomalies will be corrected and not repeated with PLR2.**

We recognise that the team has tried to create wide shared paths with space to separate pedestrians and cyclists. However, we are concerned that the ATL will be a 2.5m shared path in places along South Street, Rydalmere, Boronia Street, Ermington and Waratah Street, Melrose Park. This does not meet TfNSW's own guidelines in the Cycleway Design Toolbox^{vi} and will cause conflict between people walking and cycling, a major issue in areas with rapidly growing populations.

Elements of the Hill Road cross section are surprising and not in the spirit of the rest of the PLR2 proposal. For example, on-road mixed traffic cycle lanes are shown (Figure 3). Bike riders will be placed in the 'door zone' of parked vehicles.

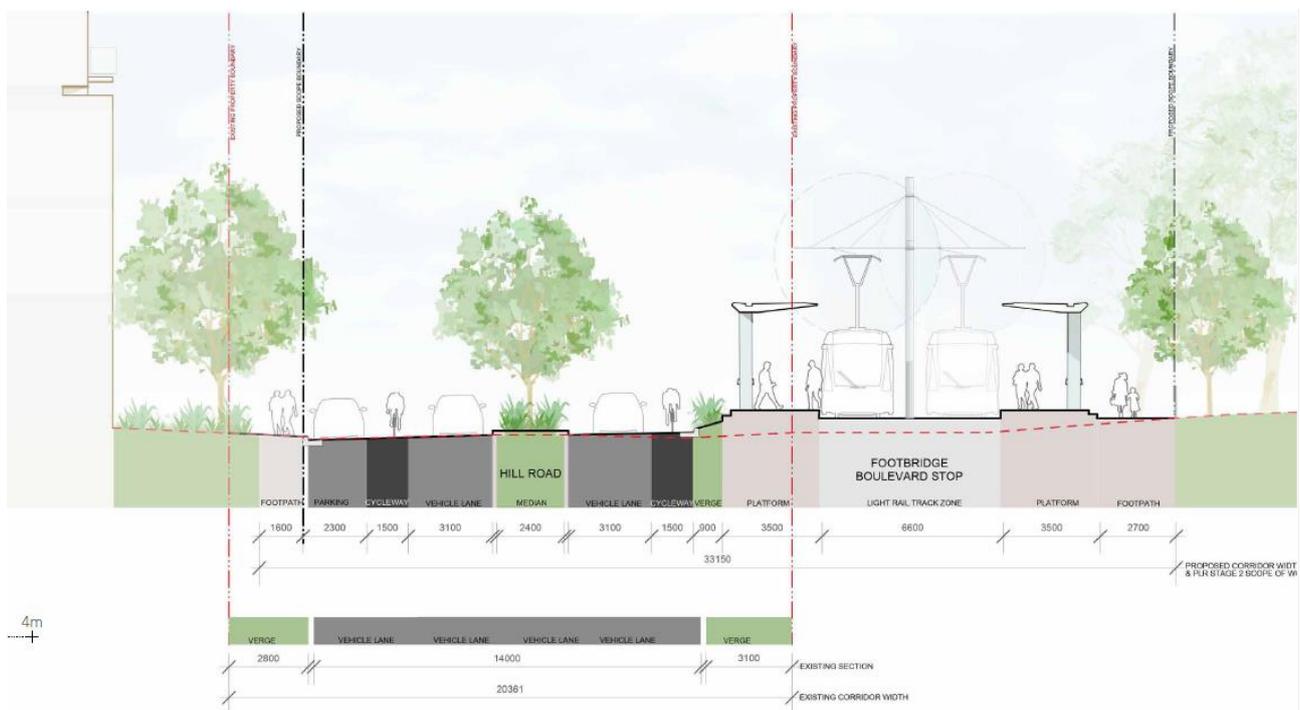


Figure 3: Cross section of Hill Road in Wentworth Point showing existing and proposed allocation of road space (Source: TfNSW / ASPECT Studios)

The Bicycle NSW *Build it for Everyone* policy pillar^{vii} sets a standard that bicycle infrastructure should be fit for eight-year-old children or elders to ride on. Door zone bike lanes, bike stencils on the road and dangerous intersections will continue to deter the 48%^{viii} of people who are 'interested but concerned', from making the switch to bike riding.

According to the best practice 'cycling segmentation' model, developed in Portland USA to identify the type and needs of existing and potential bike riders^{ix}, bicycle paths separated from traffic will allow 70% of local residents to consider journeys by bike (Figure 4).



Figure 4:
Four general categories of comfort levels for cycling as transportation.
(Source: North Sydney Council)

Another Hill Road cross section (Figure 5) shows a substandard 2.5m shared path alongside 6 vehicle lanes. The existing road has 5 lanes. The project team states that vehicle capacity cannot be reduced on Hill Road^x as it is the only access to Wentworth Point. However, there can be no reason to create *an extra lane* and prioritise car traffic over the best outcomes for walking and cycling.

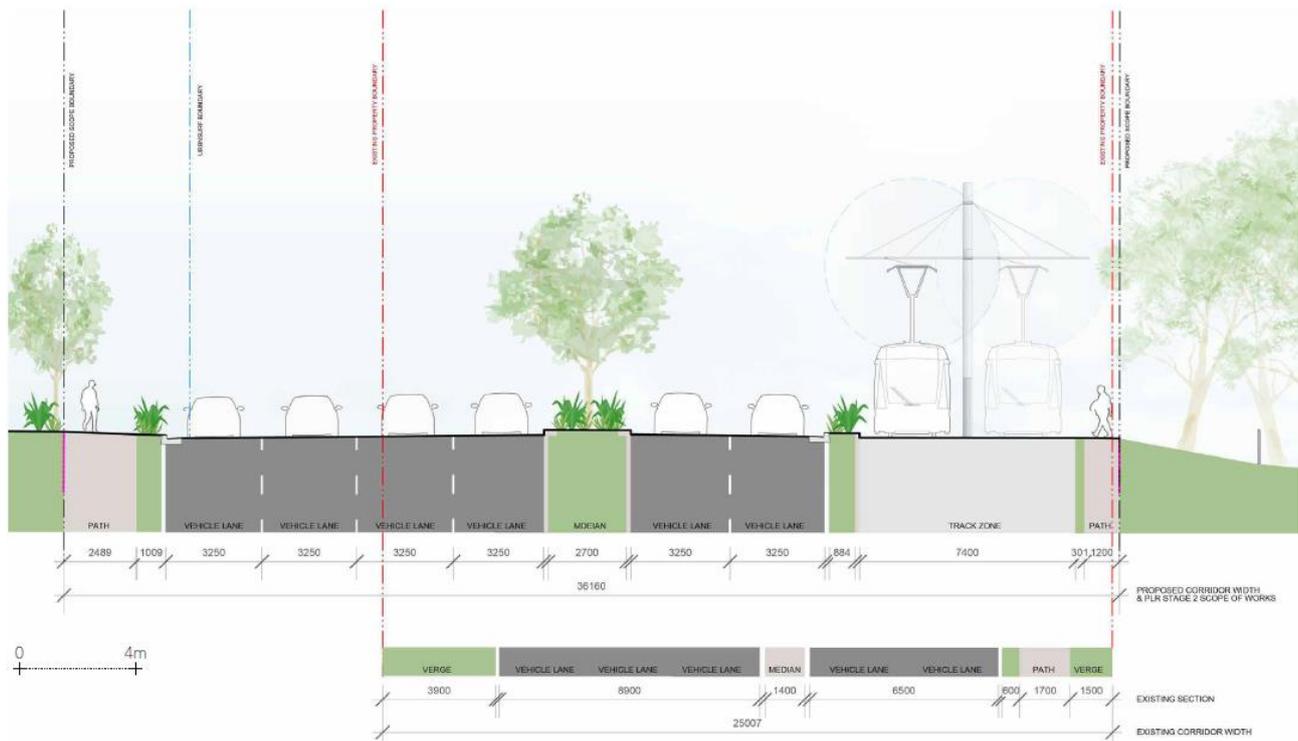


Figure 5: Cross section of Hill Road near Holker Street in Wentworth Point showing existing and proposed allocation of space (Source: TfNSW / ASPECT Studios)

Recommendations:

- **Enable cycling in the Parramatta CBD**

If PLR is to achieve its vision for the 30-minute city, bicycle riding *must* be encouraged in the CBD and not excluded. There are currently 'No bikes allowed' signs in the CBD larger than the road stencils allowing bikes, sending a negative message about bike riding to a large and diverse population when it ought to be encouraged. This is due to safety concerns regarding crossing light rail tracks at acute angles. Where bikes can cross at a perpendicular angle, bike access is allowed.

Prior to PLR1, the intersection of Church and O'Connell Streets has been a strong desire line for bicycle riders. Now they are prohibited from crossing. This measure undermines an inclusive ATL as well as safety because, when desire lines are thwarted, people seek their own unsafe crossing points at heightened risk.

The provision of bike boxes (painted squares for cyclists ahead of traffic at intersections) are half-way stopping points that help facilitate hook turns. However, the signage 'hook turn recommended' on crossings perpendicular to the rail lines is meaningless without widespread, multilingual education of what a hook turn actually is.

The mixed messaging in Parramatta is unhelpful for cyclists, especially those from non-English speaking backgrounds who will avoid the CBD and spill onto pedestrian paths, increasing the odds of collisions. Bicycle riders may also get caught in intense Church Street and Victoria Road traffic.

Another issue is caused by Horwood Place being one-way northbound. Bicycle riders can't get back from the river to the Parramatta Square. Bicycle NSW recommends exploring contraflow alternatives that enable 2-way bicycle traffic on one-way streets. In August 2022 the City of Sydney exhibited [a proposal](#) to allow two-way bike traffic on 159 one-way streets. A recent study has shown that contraflow cycling does not increase cyclist crash or casualty rates and that all one-way streets should be evaluated to allow contraflow cycling to improve cycling network connectivity^{xi}.

The current ATL for PLR1 stops short of the CBD at Harris Park. Bicycle NSW would like to see a completion of the missing link from Alfred St to Robin Thomas Reserve and a staged plan to provide meaningful connections from the end of the ATL to Westmead Hospital and improved signage around the shared paths at Westmead.

- **Ensure that bike riders can cross the light rail tracks safely**

Bicycle NSW recommends seeking a solution that enables bicycles full access to CBD streets. As [previously suggested](#), track inserts in should be used in locations where paths cross at acute angles. There are translatable solutions that have been developed in different parts of the world to make tram tracks safer for bicycles. We would welcome participating in a trial with Transport for NSW. Of course, we also support the education campaign planned for all road users when PLR1 trams start operating and the temporary asphalt infill is removed.

We have been reassured that the Stage 2 alignment has been carefully planned to ensure that crossing points are always close to right angles. We will monitor this closely as the designs are developed in more detail.

- **Ensure all shared paths are wide enough to separate pedestrians and bike riders**

It is important to future-proof shared paths by allowing for increased demand at the outset. Paths should be wide enough for overtaking and must accommodate a range of mobility options such as cargo bikes and disability scooters. **A minimum width of 3m** should be achieved at all times with extra width considered where volumes of people walking and cycling may be high^{xii} (see Figure 6). It is important that faster cyclists can overtake and that pedestrian comfort is never compromised. In busy areas, paths should be wide enough to provide visually separate space for pedestrians to avoid pedestrian and cyclist conflict.

Bicycle NSW recommends referring to the new Cycleway Design Toolbox^{xiii} and the 2017 Austroads Cycling Aspects of Austroads Guides (AP-G88-17) to ensure that the paths are constructed to current best practice.

Figure 6: Suggested shared user path widths (Source: Austroads Guide to Road Design Part 6A: Paths for Walking and Cycling)

	Suggested path width (m)		
	Local access path	Regional path ⁽³⁾	Recreational path
Desirable minimum width	2.5	3.0	3.5
Minimum width – typical maximum	2.0 ⁽¹⁾ – 3.0 ⁽²⁾	2.5 ⁽¹⁾ – 4.0 ⁽²⁾	3.0 ⁽¹⁾ – 4.0 ⁽²⁾

1. A lesser width should only to be adopted where cyclist volumes and operational speeds will remain low.
2. A greater width may be required where the numbers of cyclists and pedestrians are very high or there is a high probability of conflict between users (e.g. people walking dogs, in-line skaters etc.).
3. May be part of a principal bicycle network in some jurisdictions.

As discussed, the shared path will be only 2.5m wide in places along South Street, Rydalmere, Boronia Street, Ermington and Waratah Street, Melrose Park. These locations have a constrained road geometry. Despite efforts to narrow vehicle lanes and remove parking, there is not currently space for a wider shared path.

Unfortunately, the PLR2 project is not able to acquire property for active transport. However, we support the strategy of requiring future developments along the corridor to adhere to increased setbacks. This will accommodate a segregated bicycle path, allowing the existing SUP to be converted into a footpath and ensuring future separation of people walking and cycling as higher density residential precincts are established.

In the meantime, it is recognised that a small percentage of ‘strong and fearless’ bike riders are comfortable in traffic and prefer the direct routes offered by roads. They will not always use substandard shared paths. Cycling can be made safer on these roads with reduced speed limits, forward stop lines at intersections, head start green lights, and regular maintenance to ensure smooth surfaces.

- **Reduce speed limits to 30km/h on local streets**

30 km/h speed limits reduce the need for separate bicycle infrastructure on residential roads and town centres. 30 km/h has been shown as an optimal speed limit to allow people driving and cycling to share the road safely^{xiv} 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^{xv}.

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^{xvi}.

The British Medical Journal^{xvii} found that the use of 20mph (32kph) over a twenty-year period from 1986–2006 significantly improved road safety for users of all transport modes and ages. The rate of children under 15 years old being killed and seriously injured dropped by 50% in areas where the speed limit is reduced to 20mph (32kph). Most Australians already support lowering speed limits in neighbourhoods^{xviii}. Acceptance usually increases after implementation, as has been the case in countries like the UK and Germany. Several 30km/h trials run in Melbourne and New Zealand before 2020 have been successful. Popularity increased further after people experienced the benefits^{xix}. The UN resolution of August 2020^{xx} urged all countries to adopt 30 km/h limits in areas where people are walking and playing.

- **Ensure the ATL is inclusive and accommodates riders of all ages and abilities**

All types of bikes should be accommodated by the cycling infrastructure, including cargo bikes and tricycles. The width of the paths is critical and it is important to consider turning radius, dropped kerbs, ramps and the design of modal filters to ensure that non-standard bikes not excluded from the network. Cargo bikes will increasingly be used for deliveries and have huge potential to play a key role in a sustainable transport system. Non-standard bikes such as hand-cycles, recumbents and wheelchair bikes offer disabled people independent mobility but are a rare sight on urban streets due to barriers caused by poor urban design. Any measures enabling cycling by disabled people will support a growth in cycling by novice cyclists, children and older people, and improve conditions for those using mobility scooters^{xxi}.

- **Be strong about removing on-street parking**

The PRL2 requires the reallocation of 688 parking spaces for public and active transport and essential tree canopy. Transport for NSW 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, sustainable transport for the whole community suffers.

It is getting easier and easier to access a car for trips that are too awkward by public or active transport. Car sharing and ride hailing are slowly chipping away at the one-person, one-car mentality that Australians are accustomed to after 60 years of car-centric planning. In 2021, 25.9% of Parramatta households had no car and this figure can be expected to increase^{xxii}. In 2019, membership of local car share schemes grew by 20%, showing a huge appetite for new models of vehicle use^{xxiii}.

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 3^{xxiv}. 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 trade^{xxv}.

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 multi-modal transport corridor which benefits the wider community.

- **Prioritise pedestrians and cyclists at all intersections**

Traffic light phasing and sensors must favour active modes to encourage more people to walk and cycle. In line with the Road User Space Allocation Policy and other State and Council strategies, small delays to vehicle traffic should never prevent the delivery of safer, more efficient and more attractive active transport infrastructure. Pedestrian and bicycle level of service should be optimised with the following features:

- Instant green on demand for pedestrians and bicycles at mid-block crossings, with induction loop detectors for bicycles/wheelchairs/mobility scooters and fully accessible push buttons.
- Longer crossing times so that pedestrians of all ages and abilities have time to cross safely and without stress.
- Automatic green for pedestrians/bicycles at all signalised intersections so there is no need to press a 'beg button'
- Raised crossings at unsignalised intersections will slow cars and improve safety.
- Bicycle paths must continue across both raised and signalised crossings so people riding bikes are not required to dismount.

- **Ensure safe access though and along the corridor during construction**

It is essential to maintain safe walking and cycling through the area during construction. Existing cycleways are critical to many journeys and removing sections from the network, even temporarily, would be a backward step for the mode shift to cycling. Please refer to Austroads Guide to Temporary Traffic Management^{xxvi} and adhere to the principles of coherence, equivalence, directness and safety during construction.

Temporary detours to existing routes must aim to be direct and convenient. Project planners need to consult with Bicycle NSW and BUGs about how to avoid or at least minimise detours. This will require bicycle-based site tours to ensure a best-practice outcome in line with current thinking around movement and place. Please take advantage of our local knowledge, engineering and planning expertise to develop plans for the detours.

In some situations, new shared paths or separated bicycle facilities will be constructed before a detour begins. It is important that a level of safety equal to the existing facilities is provided. Such new infrastructure should aspire to have a long-term benefit, improving and adding linkages into the local area. Funding is warranted by Providing for Walking and Cycling in Transport Projects Policy^{xxvii}.

Corridor Options

The project as described in the EIS delivers light rail and an active transport link through Camellia via the Sandown Line and along the northern side of Grand Avenue. Significant urban renewal is planned for Camellia in the future and an extra light rail stop will be added in due course.

Appendix D of the EIS sets out an alternative route for connecting Rydalmere and Camellia, taking the light rail and the ATL along the foreshore of the Parramatta River (Figure 7). Our initial response is that the **Grand Avenue alignment is preferred**. The foreshore is a sensitive environment with established mangrove forests which would be permanently altered by transport infrastructure running very close to the river's edge. We understand that it will be difficult to acquire sufficient land along the foreshore to locate the light rail tracks well away from the water. However, we definitely support the addition of a standalone shared path along the foreshore. This would require a much narrower strip of land.

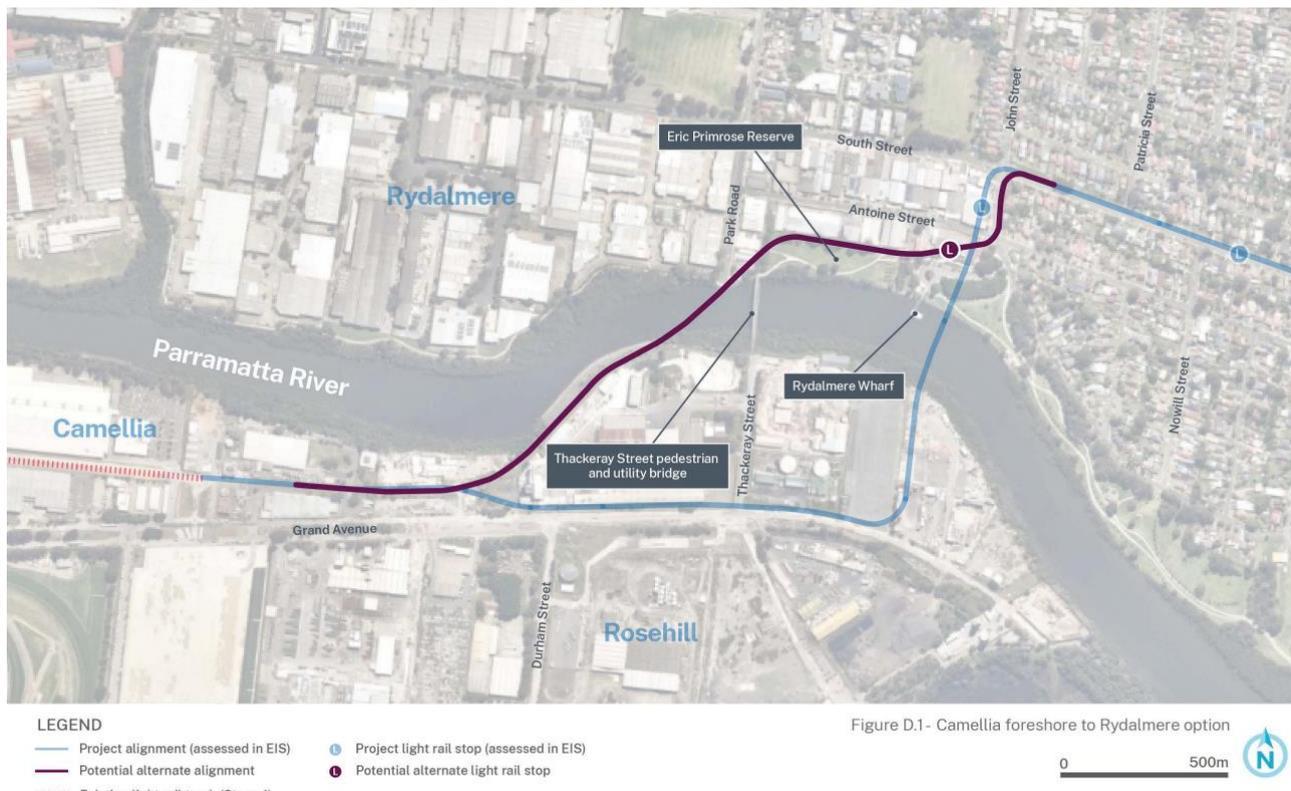


Figure 7: Map showing the two Camellia to Rydalmere alignments (Source: TfNSW)

Conclusion

Parramatta Light Rail Stage 2 is a hugely exciting step forwards for public transport connectivity in the Central River City. If the ATL is delivered as promised, the growing population will have multi-modal transport options that ensure equitable access to jobs, education and recreation opportunities.

Active transport projects have big benefits, and not only for reducing pollution, noise and congestion. Active mobility improves public health, activates high streets, helps build social connections and addresses inequality.

Bicycle NSW looks forward to working with the PLR2 team to progress the detailed design of walking and cycling infrastructure. Please reach out to us with any questions or help needed. If requested, we would be delighted to assist with advocating for the best outcomes for cycling infrastructure through our connections with politicians, Transport for NSW and local government.

Yours faithfully,

Sarah Bickford

Sarah Bickford

Bike Planner
Bicycle NSW

Francis O'Neill

Francis O'Neill

Head of Advocacy
Bicycle NSW

- ⁱ TfNSW. 2022. Parramatta Light Rail Stage 2 project overview, <https://plr2.ghdengage.com/virtual-room/board-5/>
- ⁱⁱ PLR2 Factsheet, <https://www.parramattalightrail.nsw.gov.au/factsheets>
- ⁱⁱⁱ Transport for NSW/ Aspect Studios. 2022. Design, Place and Movement Report. <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSI-10035%2120221104T043346.374%20GMT>
- ^{iv} NSW Government, Road User Space Allocation Policy CP21000, [Online as at 19/2/2021] www.transport.nsw.gov.au/system/files/media/documents/2021/road-user-space-allocation-policy.pdf
- ^v NSW Government, Providing for Walking and Cycling in Transport Projects Policy CP21001, <https://s23705.pcdn.co/wp-content/uploads/2021/02/providing-for-walking-and-cycling-in-transport-projects-policy.pdf>
- ^{vi} Cycleway Design Toolbox: designing for cycling and micromobility. Transport for NSW. <https://www.transport.nsw.gov.au/system/files/media/documents/2021/Cycleway-Design-Toolbox-Web.pdf>
- ^{vii} Bicycle NSW (2018) Our Policy, [online as at 24/2/2021] <https://bicyclensw.org.au/our-policy/>
- ^{viii} 70% of people when surveyed said they would ride more if they felt safe NSW Government, Sydney's Cycling Future (2013) [Online as at 24/2/2021] <https://www.transport.nsw.gov.au/sites/default/files/media/documents/2017/sydneys-cycling-future-web.pdf>
- ^{xvi} Roger Geller. (2009). Four types of cyclists. Portland Bureau of Transportation. <https://www.portlandoregon.gov/transportation/article/264746>
- ^x Transport for NSW/ Aspect Studios. 2022. Design, Place and Movement Report. <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSI-10035%2120221104T043346.374%20GMT>
- ^{xi} Tait, C et al. 2022, November. Contraflows and cycling safety: Evidence from 22 years of data involving 508 one-way streets. Accident Analysis & Prevention. https://www.sciencedirect.com/science/article/pii/S000145752200330X?ref=cra_js_challenge&fr=RR-1&fbclid=IwAR31R7j-buvhrne52riMqd2GUWYj19aitRMnSYvqQyCZUE-aqbF0Ohv1LA0
- ^{xii} Austroads, 2021. Guide to Road Design Part 6A: Paths for Walking and Cycling AGRD06A-17. <https://austroads.com.au/publications/road-design/agrd06a/design-criteria/width-of-paths/shared-paths>
- ^{xiii} Cycleway Design Toolbox: designing for cycling and micromobility. Transport for NSW. <https://www.transport.nsw.gov.au/system/files/media/documents/2021/Cycleway-Design-Toolbox-Web.pdf>
- ^{xiv} City of Yarra - 30km/h speed limit: pre-trial final report, 2017. <https://thanksfor30.com.au/sites/default/files/2018-08/City-of-Yarra-Pre-Trial-Report-Aug-2017-FINAL%5B1%5D.pdf>
- ^{xv} O'Sullivan, F. (2020, November). Why Europe is slowing down. Bloomberg CityLab. <https://www.bloomberg.com/news/articles/2020-11-18/speed-limits-are-dropping-in-europe-and-the-u-k>
- ^{xvi} Vision Zero Network. (2015, April 13). European Cities Lead the Way Toward Vision Zero. <https://visionzeronetwork.org/european-cities-lead-the-way-toward-vision-zero/>
- ^{xvii} The British Medical Journal, <https://www.bmj.com/content/339/bmj.b4469.full>
- ^{xviii} What Australians want report, https://irp.cdn-website.com/541aa469/files/uploaded/What_Australia_Wants_Report_.pdf
- ^{xix} https://www.20splenty.org/20mph_choice
- ^{xx} 20's Plenty. 2020, August. General Assembly of the United Nations says 20's plenty. http://www.20splenty.org/un_says_20splenty
- ^{xxi} Wheel for Wellbeing. 2020. A Guide to inclusive cycling. https://wheelsforwellbeing.org.uk/wp-content/uploads/2020/12/FC_WfW-Inclusive-Guide_FINAL_V03.pdf
- ^{xxii} Australian Bureau of Statistics, 2021. Quickstats for Parramatta suburb. <https://abs.gov.au/census/find-census-data/quickstats/2021/SAL13167>
- ^{xxiii} Inner West Council. 2021, Feb. Proposed care share policy. <https://yoursay.innerwest.nsw.gov.au/car-share-policy-draft>
- ^{xxiv} Sorrel, C. 2017, February. *Why Local Businesses Shouldn't Worry About Eliminating On-Street Parking*. Fast Company.
- ^{xxv} Transport for London. Walking and Cycling: the Economic Benefits. <http://content.tfl.gov.uk/walking-cycling-economic-benefits-summary-pack.pdf>
- ^{xxvi} Austroads Guide to Temporary Traffic Management (2019) [Online 1/4/2020] <https://austroads.com.au/publications/temporary-traffic-management/agttm-set>
- ^{xxvii} NSW Government, Providing for Walking and Cycling in Transport Projects Policy CP21001, <https://s23705.pcdn.co/wp-content/uploads/2021/02/providing-for-walking-and-cycling-in-transport-projects-policy.pdf>