

Transport for NSW
South East and Tablelands Regional Transport Plan team
Level 4, 90 Crown Street
Wollongong NSW 2500

23rd February 2023

Dear Sir or Madam,

RE: Draft South East and Tablelands Regional Transport Plan

Thank you for the opportunity to provide feedback on the Draft South East and Tablelands Regional Transport Plan.

Bicycle NSW has been the peak bicycle advocacy group in NSW for forty-eight years, and has over 30 affiliated local Bicycle User Groups. Our mission is to *'make NSW better for all bicycle riders'*, 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.

Bicycle NSW enjoyed reviewing the Draft Plan. The significant infrastructure investments proposed in the draft Transport Plan have the scale and scope to considerably change the way people and goods move both within and beyond the region. **The Transport Vision and Objectives are supported.** However, we have concerns about the continued focus on road upgrades, as set out below.

It is very encouraging to see that the Draft Plan has pivoted during the course of its preparation to reflect the new **Future Transport Strategy**, released in September 2022. The Draft Plan directly supports the three strategic outcomes of the Future Transport Strategy – *Connecting our Customers, Successful Places and Enabling Economic Activity* – with *"nine objectives, divided between the strategic outcomes, and 49 corresponding initiatives that provide the blueprint for realising the transport vision for the South East and Tablelands"*.

The Plan aspires to adopt **an excellent 'vision and validate' approach to transport planning**. Current travel patterns are not sustainable and should not dictate future need. It is recognised that travel behaviour can and will change over time, and this change needs to happen to achieve the transport vision. Critically, the high dependence on private cars, which account for 91% of 'journey to work' trips, must be challenged.

Bicycle NSW is delighted that a headline ambition for the draft Transport Plan is to make *"walking, cycling, and other micromobility options more attractive, so people can leave their cars at home"*. This will be supported by land use planning that enables *"15-minute neighbourhoods where people can easily walk or cycle through their town, village, or neighbourhood"*.

It is great to see the Transport Vision underpinned by the raft of excellent NSW Government plans, strategies and frameworks that have been released since 2019. These reflect 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 Draft Plan aligns with the Movement and Place Framework, which takes a cross-governmental integrated approach to infrastructure projects and land use design. It is bolstered by the Road User Space Allocation Policyⁱ, 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. The Providing for Walking and Cycling in Transport Projects Policyⁱⁱ will be applied to every transport project funded by Transport for NSW to ensure provision for walking and cycling as an integral element of a project. Multiple environmental and health benefits will flow from increased walking, cycling and public transport use. The streets will be more equitable for residents of all ages, incomes and abilities.

We are heartened by the attention given to school transport. According to the NSW School Safety Surveyⁱⁱⁱ, 36% of parents don't let their children walk or ride to school due to unsafe road crossings. 25% of Australian children aged 2-17 and 67% of adults are considered overweight or obese. Obesity linked to physical inactivity is a major contributor to type 2 diabetes with estimates showing that eliminating obesity from the population can potentially reduce the incidence of diabetes by over 40%^{iv}.

Safe paths to school were unanimously voted as the 'most achievable goal for active transport' at the 2022 Transport for NSW Mobility Summit. Safe paths to school can be rolled out rapidly and cheaply through relatively minor adjustments to existing infrastructure. New pedestrian crossings, greater pedestrian priority at intersections, continuous raised footpaths across minor intersections and footpath upgrades with pram ramps, landscaping and seating will encourage more walking and cycling. As discussed later, we also **strongly advocate for the reduction of speed limits to 30 km/h in town centres and residential streets**.

Finally, we note that the Draft Plan responds to the devastating bushfires of 2019-2020, the wake-up call of the IPCC report of 2021 and the need to support the State's target of achieving a net zero economy by 2050, seeking to develop a low-emission and resilient transport sector.

Several key goals for 2041 are strongly supported:

- Nearly one in every five trips (18%) will be made by walking, cycling or public transport across the region – more than doubling of the current mode share. This is particularly important in view of the aging population with the proportion of resident over 65 set to increase from 22% (64,090 people) to 28% (97,933 people) in 2041.^v
- A high proportion of the region's population will have access to day return services to their nearest regionally significant centre.
- Rail trails will be developed, with Goulburn to Crookwell and Monaro highlighted. Bicycle NSW was instrumental to the passing of Transport Administration Amendment (Rail Trails) Bill 2022 by the Legislative Council on 12th August 2022^{vi}. This amendment removes the need for each rail trail proposal to have a separate act of parliament and enables the Minister for Regional Transport to allow derelict tracks to be converted into a rail trail for 'recreation, tourism or related purposes'.
- The region will achieve NSW Government's target of 50 per cent emissions reduction by 2030 (over 2005 levels) and Net Zero emissions by 2050.
- Multi-modal connectivity will improve within centres, within the region and beyond the region. Ensuring that trains, buses, shared cars, cycling facilities and a high-quality pedestrian realm can be combined for a seamless trip will be key to making walking, cycling and public transport attractive alternatives to the private vehicle for more trips, more often.

- Opportunities to enable the use of more micromobility technologies to support multimodal end-to-end journeys will be explored.
- Transport infrastructure will be used to make a tangible improvement to places, with high-quality design that puts people, not cars, first.
- Crash rates will be reduced in line with the ‘Towards Zero’ goal of zero fatalities and serious injuries on the roads by 2050.
- Technology will be used to support safer, more efficient and accessible transport network.
- Increased resilience will be built into the transport network, recognising that active transport plays a huge role in providing customers with viable alternative transport options during network disruptions. The region has suffered from bush fires and flooding in recent years, and natural disasters are likely to get worse.

Concerns

- The Draft Plan includes numerous “road upgrade” projects. Of the 49 initiatives, 15 relate to highway upgrades. We are concerned that, despite good intentions to prioritise active transport, the car-first thinking of the last 70 years will predominate and the major rationale for road projects will be to ‘ease congestion’. The result is likely to be wider roads, new slip roads and additional capacity, allowing more cars to travel at faster speeds. It is not possible to meet climate goals by repeating past mistakes.
- Although the Draft Plan recognises the important of tourism, there is little mention of the potential of cycle tourism.
- The lack of facilities for bikes to be carried on trains and buses is not discussed. Cycling could make a more significant contribution to multi-modal journeys if bikes were able to be taken on public transport.
- The Draft Plan does not specify how much walking and cycling infrastructure is needed to complete networks and there is no discussion of the type of infrastructure that should be delivered.
- The fatality rate on country roads is four times the comparative metropolitan rate and although the number of serious crashes across the South East and Tablelands has reduced year-on-year since 2017, a lot more effort is required from all agencies to meet the Toward Zero goal. The Draft Plan does not discuss improving safety for bicycle riders on the highways and contains only a tentative proposal to introduce low speed zones in the CBDs of larger towns.
- Note – the Draft Plan appears to be missing the initiatives table that should sit under *Objective 6 – Transport infrastructure makes a tangible improvement to places.*

Recommendations:

Bicycle NSW is pleased that several objectives refer to walking and cycling as a means of meeting climate, health and liveability goals. However, we have identified where ambitions for active transport fall short in the Draft Plan and take this opportunity to suggest ways to strengthen provision for walking and cycling in the final Transport Plan.

- **Align walking and cycling objectives with the new Active Transport Strategy**

The NSW Government released an Active Transport Strategy^{vii} in December 2022, hot on the heels of Future Transport Strategy. It contains goals around 15-minute neighbourhoods, precinct renewal, behaviour change and cycleway networks. It is essential that LGAs in the South East and Tablelands apply to participate in the trials such as 'Neighbourhood Deals', main street road reallocation, and the Safer Cities and Active Travel to School programs. Regional towns and cities will benefit from the investment and expertise that will flow from the trials.

- **Incorporate numerical targets for new and improved active transport infrastructure**

The South East and Tablelands Transport Plan should include specific goals for delivering high-quality shared paths and cycleways to complete networks and link homes to school, workplaces, stations, sports facilities and shops. Expanding the active transport network in regional cities, centres, towns and villages would reduce reliance on private vehicles and curtail increases in congestion and pollution as the population grows.

- **Interrogate any road projects that will increase capacity and induce more driving**

We suggest that Transport for NSW takes inspiration from Wales^{viii}. The Welsh Government has recently [reviewed](#) 59 major road building projects against environmental and safety criteria. Only 17 of the road projects will now proceed. Design changes will be made to stop them fueling more car demand. Going forward, new roads will only be built if their proponents can prove they will support the transition to non-car travel, help Wales adapt to the impacts of climate change or improve safety with relatively minor changes. Schemes will be rejected if they increase capacity for cars or allow cars to travel at higher speeds.

Any additional asphalt should benefit active transport. Even better, reallocate existing road space as directed by Future Transport Strategy under *E2: Optimise existing infrastructure*. Reconfiguring vehicle and parking lanes to prioritise more efficient vehicles will get more capacity for moving people from existing assets. Bicycle and bus lanes will reduce the number of private vehicle trips and improve the liveability and vibrancy of our communities.

- **Work with train and bus operators to allow carriage of cycles**

Although bikes can be wheeled onto the CityRail services to Goulburn and Kiama, they must be boxed and weigh under 20kg to be accepted onto the faster regional trains. Only a limited number of bikes (usually 5) can be carried on each train. Many bicycles, such as e-bikes and tandems, do not fit within the size and weight limits. This is a serious impediment to bike-related tourism, particularly as e-bikes grow in popularity, opening up cycle touring to a much broader demographic.

Allowing unboxed bikes to be carried on buses, coaches and trains will enable integration of active transport with day return trips on public transport, reducing the need to drive to complete door-to-door journeys.

In view of the economic, health and environmental benefits of encouraging cycling, Bicycle NSW supports the campaign for new trains currently being procured by the NSW Government to have more space allocated to bicycles, with roll on/roll off storage replacing the requirement to box bikes. Please see <https://bicyclensw.org.au/bikes-on-nsw-trainlink-campaign/> for more information.

We also suggest initiating discussions with bus operators to develop a strategy to allow bikes to be carried on buses, either in the luggage compartment or on a rack mounted on the front of the bus. This will allow one-way trips, help solve 'last mile' barriers to public transport use, open up the cycle network to a wider range of users and provide access to trails and everyday destinations without using a car.

- **Provide cycling infrastructure that is segregated from vehicles**

Bicycle NSW supports bicycle infrastructure that is completely separated from vehicles on main roads to cater for riders of all ages and abilities. Mixed traffic cycle routes are only appropriate where speed limits or traffic volumes are very low.

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}. Such segregated cycle paths will allow 70% of local residents to consider journeys by bike.

Where there are few pedestrians, shared paths through parks or on footpaths are a suitable solution. In areas with high levels of pedestrian and cycling activity, standard shared paths will not lead to an acceptable level of amenity and safety for either walkers or riders as conflict occurs between different users. Separated bicycle paths within the road environment should be considered.

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

- **Improve safety on rural roads linking towns and villages**

Bicycle NSW has consulted with local cycling advocates and a common request is that the main roads connecting urban centres are made safer for cyclists. In the short term, wide shoulders, signage, speed restrictions and intersection improvements are essential. In the longer term, separate bicycle paths should be developed along key routes.

The Draft Plan contains a long list of road upgrades that will be delivered by 2041. Providing for Walking and Cycling in Transport Projects Policy^{xi} will apply to many of these projects, requiring provision for walking and cycling to be delivered from the outset of the project.

Cycle paths and safe intersections should also form part of upgrades to Council-managed roads. It is much easier and more cost effective to provide for walking and cycling during construction work than at a later date.

- **Reduce speed limits to 30km/h in residential roads and town centres**

Bicycle NSW is delighted that a 30 km/h High Pedestrian Activity Area has been introduced in Moruya. The reduced speed limit makes it safer for pedestrians to shop and enjoy the town, especially during the busy summer holidays, while also reducing noise and pollution. This should be rolled out very widely across the region.

30 km/h speed limits reduce the need for separate bicycle infrastructure on local streets. 30 km/h has been shown as an optimal speed limit to allow people driving and cycling to share the road safely^{xii} 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^{xiii}.

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^{xiv}.

- **Ensure that new cycle infrastructure is inclusive**

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 radii, 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^{xv}.

- **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 local strategies, small delays to vehicle traffic should never prevent the delivery of safer, more efficient and more attractive active transport infrastructure. Raised crossings at unsignalised intersections will slow cars and improve safety. Bicycle paths must continue across the raised crossings so people riding bikes are not required to dismount.

- **Develop physical and digital mapping to highlight walking and cycling routes**

Wayfinding must support visitors by clearly articulating and communicating the most efficient and safest way to reach a destination on foot or bike. Active transport is often inhibited by a lack of knowledge about attractive and convenient routes. Even life-long residents of a town may not realise that a trip could be completed more quickly and efficiently on foot than by car. Signage style for wayfinding should be consistent throughout each town and reflect the diversity of the community.

- **Increase tree canopy cover over the walking and cycling network**

Climate change is causing an increase in hot weather in Country NSW. Many areas experience 10-20 days each year where the maximum temperature is greater than 35°C. Maximum summer temperatures are predicted to increase by 2.3°C by 2070 when 40 annual hot days over 35°C are likely^{xvi}.

It is essential to create a tree canopy over footpaths and shared paths to ensure that they are comfortable to use in the warmer months, allowing opportunities for exercise and mitigating the health impacts of inactivity, such as diabetes and heart disease. The correct trees for the climate, soil and topography must be selected, and an adequate maintenance program instigated. We recommend following the research being undertaken into heat resilient street trees at Western Sydney University through the [Which Plant Where?](#) Project.

- **Future proof the active transport network**

The status quo of walking and cycling activity in Regional NSW is likely to change rapidly. The density of walkers will increase when new housing and employment is delivered as proposed. An upswing in travel by bikes has occurred recently due to COVID-19, individual reactions to climate change, a surge in online delivery services and the growing popularity of e-bikes. In addition, State policies to address climate change and urban liveability will add to pressures on councils to secure a much bigger travel share for walking and cycling. It is important to future proof the cycle network 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. As discussed above, pedestrians and bike riders should be separated where possible.

- **Develop facilities for cycle tourism**

Cycle tourism has enormous potential to attract visitors to regional areas and provide business opportunities for local residents. Rail trails are gaining momentum in NSW. The Tumbaramba to Rosewood trail has brought a constant flow of visitors to small villages in the area since it opened in 2020, supporting 9 new businesses^{xvii}. The Northern Rivers Rail Trail will be a catalyst for the Tweed Valley becoming an important hub for cycling. Tourism on neighbouring Brisbane Valley Rail Trail (BVRT) is going from strength to strength. The BVRT is a great example of what can be achieved through community and government support.

Dedicated infrastructure is not always required for tourist routes. Establishing a series of waymarked routes on scenic back roads and publishing maps and resources to promote cycle touring will draw cyclists from far and wide and support a vibrant rural economy. The Central West Trail is a fantastic example of this, as are the waymarked bicycle trails that link the vineyards of the Lower Hunter and the Barossa Valley. It is important for neighbouring councils to work closely to facilitate longer touring routes.

Mountain biking is also very popular. The Blue Derby trails in north-eastern Tasmania provide an excellent example of bike tourism bringing economic benefits for local communities. \$3.1 million was invested in mountain bike trails in 2015. Now, more than 30,000 tourists visit the trails each year, injecting more than \$30 million back into the Tasmanian economy^{xviii}.

Share bike rental hubs should be provided in tourist centres to ensure access to the trails for all visitors. Facilities for e-bike charging, bike maintenance and bike storage need to be created in key locations.

- **Develop compelling storytelling and communications strategies**

Communicate proposed changes to residents in terms of road safety, children's independence, traffic calming, noise reduction, business improvement, environmental amenity improvements. Avoid focusing on what bike riders or pedestrians gain, or highlighting the number of car parking spaces lost. The [Better Streets](#) alliance has resources to help frame projects in a way that will bring everyone on board.

Conclusion:

There has never been a better time to build for active transport. As the Minister for Infrastructure, Cities and Active Transport, Rob Stokes MP, set out in a recent speech^{xix}, active travel projects that stitch the suburbs together and enable people of all ages and abilities to get around without a car can be more sustainable than megaprojects. Active mobility improves public health, activates high streets, helps build social connections and addresses inequality.

Bicycle infrastructure has a low cost per km, offering better value than road projects and supporting Councils' financial sustainability. Over 100km of bike paths can be delivered for the cost of 1km of new road^{xx}. Studies have shown that 70% of people in NSW either ride a bike now or would start to ride if safe infrastructure was provided^{xxi}.

The urban design strategies developed for regional NSW by Government Architect NSW^{xxii}, acknowledge that private cars are likely to remain a dominant form of transport in regional areas. However, enabling active transport in town and village centres through good urban design and integrated land use planning will reduce congestion, noise and car parking pressures. Pedestrian and bike riding infrastructure developed through the lens of the Movement and Place Framework will create more space for trees and landscaping, slow traffic and allow a more compact urban form.

A 15-minute vision for developing regional town centres will allow residents to park once and then walk to shops, health services, schools and recreation using connected and shady footpaths. Allowing unboxed bikes to be carried on buses, coaches and trains will enable integration of active transport with day return trips on public transport, reducing the need to drive to complete door-to-door journeys.

Of course, bike riding facilities are also proven to attract tourists and support the visitor economy. New businesses will be needed to support eco, active and adventure tourism while existing businesses benefit from increased passing trade and foot traffic^{xxiii}.

Bicycle NSW would like to be involved with the delivery of future active transport infrastructure in the South East and Tablelands. We can offer expert advice at each stage, from the planning of walking and cycling networks to the detailed design of paths and intersections. Many of the relevant technical standards, policies and guidelines are drawn together on our [website](#). Please also note that Transport for NSW will soon publish a new Regional Cycling Plan with strategies for developing bike riding in regional areas; Bicycle NSW has contributed to the stakeholder engagement.

We look forward to working with Transport for NSW, Local Government Authorities and local Bicycle User Groups to grow active travel in the South East and Tablelands.

Yours faithfully,



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ⁱ NSW Government, Road User Space Allocation Policy CP21000, www.transport.nsw.gov.au/system/files/media/documents/2021/road-user-space-allocation-policy.pdf

ⁱⁱ 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>

ⁱⁱⁱ NSW School Safety Survey, <https://bicyclensw.org.au/wp-content/uploads/2020/06/SUMMER-HILL-SSS-compressed.pdf>

^{iv} Diabetes Australia, <https://www.diabetesaustralia.com.au/wp-content/uploads/Diabetes-the-silent-pandemic-and-its-impact-on-Australia.pdf>

^v Transport for NSW. 2022, December. Draft South East and Tablelands Regional Transport Plan https://www.future.transport.nsw.gov.au/sites/default/files/2022-12/draft_south_east_tablelands_regional_transport_plan.pdf

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