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9th October 2023

Email: Frances.Hamilton@cumberland.nsw.gov.au

Dear Frances,

Re: Regents Park Public Domain Plan

Thank you for the opportunity to comment on Cumberland City Council's plans to revitalise Regents Park town centre.

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'*, 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.

Bicycle NSW supports the proposals set out in the Regents Park Public Domain Plan to improve the urban environment for businesses, residents and visitors.

Wider footpaths, more places to cross and new tree canopy will contribute to the Council's vision for *"a vibrant town centre that will build on the local character to create an attractive, walkable, and socially inclusive open space network with high quality public realm at its centre"*.

However, we are concerned that the **Public Domain Plan does not address the constrained crossing of the train tracks**. The two options for traversing the tracks by bike are very poor, particularly for those who are not 'fit and fearless'. The road bridge has heavy traffic and the station overpass requires bike riders to dismount. Options are even more limited for people walking - the road bridge was upgraded recently with no pedestrian facilities.

The rail corridor has long been a major barrier to movement in the area, dividing the community both physically and psychologically. Ignore this and the Public Domain Plan's aim of *"promoting healthy living with good walking permeability throughout the town centre and cycling around the centre"* will not be achieved. The public domain plans for Lidcombe also lack solutions for improving connections across the rail line, as set out in our [April 2023 submission](#).

Regent Park Town Centre is strategically located at the junction of two major Green Grid open space corridors – the Duck River Parklands and Prospect Pipeline Corridor. These corridors link Bankstown to Parramatta River via Granville and Prospect Reservoir to Cooks River via Rookwood Cemetery (Figure 1). They are conceived to run through Regents Park with minimal interruption.

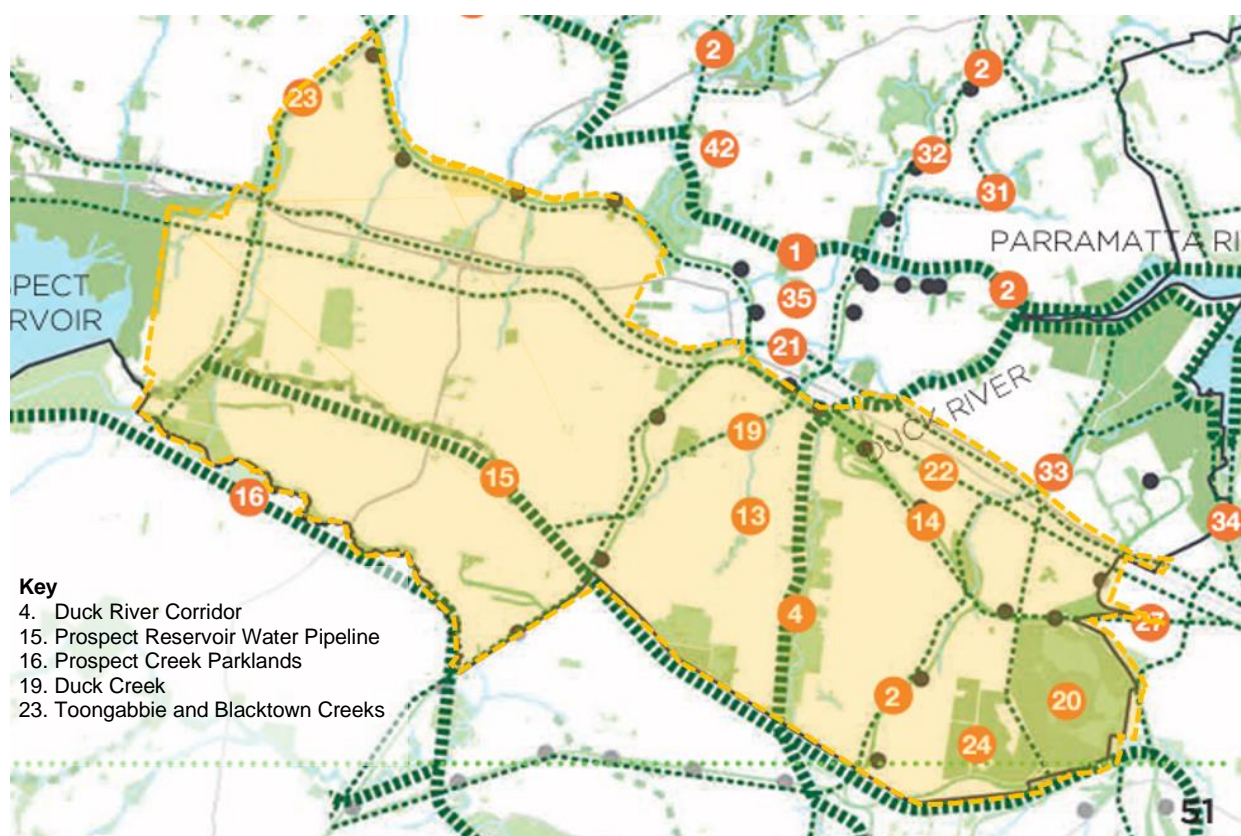


Figure 2: Extract from the Green Grid showing project opportunities in the Cumberland area. The [Sydney Green Grid](#)ⁱ, developed by the NSW Government Architect in 2017 and reflected in the district and region plans, proposes an interconnecting network of open spaces that support walking and cycling. (Source: Tyrrell Studio / NSW Government)

Cumberland's own draft Walking and Cycling Strategy identifies 3 regional corridors that terminate at Regents Park (Figure 2). Due to the location of the town centre on the very edge of the LGA, the routes are not shown passing through Regents Park. This is unfortunate and may hamper future planning of a coherent network in collaboration with Canterbury-Bankstown and Strathfield Councils.

However, new impetus to develop top-quality regional connections came with the recent release of the [Central River City Strategic Cycleway Corridors](#)ⁱⁱ (Figure 3). Two major strategic cycleway corridors intersect at Regents Park – Bankstown to Parramatta, and Fairfield to Rockwood. The NSW Government and Cumberland City Council now have a mandate to develop continuous active transport routes through Regents Park.

Another concern with the Public Domain Plan is the lack of proposals for cycling facilities on the town centre streets. Key active transport routes are clearly indicated for Rose Crescent, Amy Street and Regent Street on the map on Page 12 but there is no further information about how these will be delivered. Although some of the footpaths may be wide enough to be classified as shared paths, in busy shopping areas shared paths cause conflict between people walking and riding. It can be challenging to find space for separated bicycle paths. As discussed below, a **30km/h town centre speed limit** would enable most bike riders to feel comfortable using the road and deliver a raft of amenity and safety improvements for all road users.

Bicycle NSW works closely with CAMWEST, an affiliated Bicycle User Group in Western Sydney. CAMWEST members have worked hard over many years to advocate for better facilities for active travel in and around Cumberland. We are very grateful for their detailed knowledge of local conditions and their enormous contribution to bicycle advocacy. Bicycle NSW aligns with CAMWEST's comments about the Regents Park Public Domain Plan.

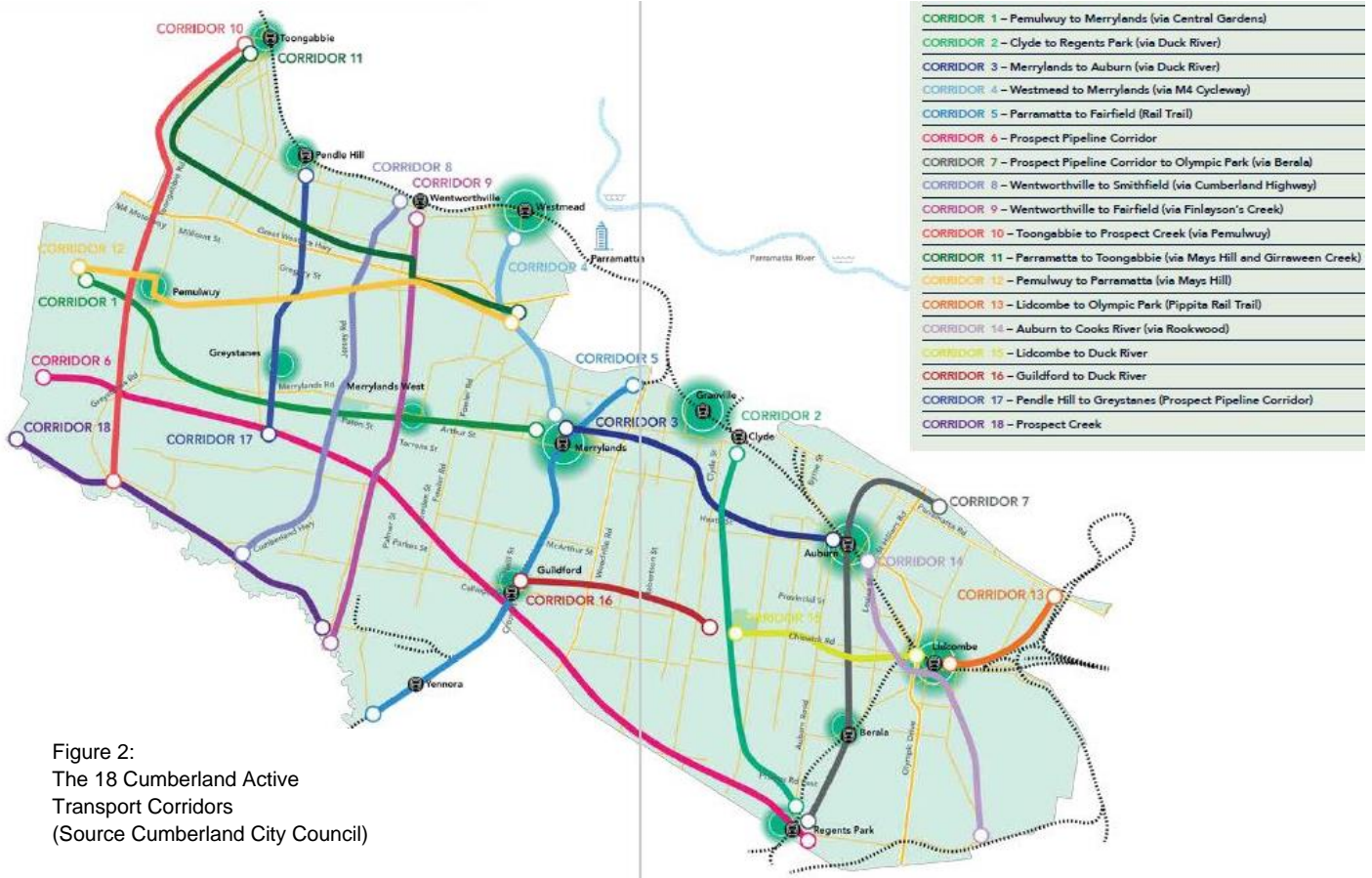
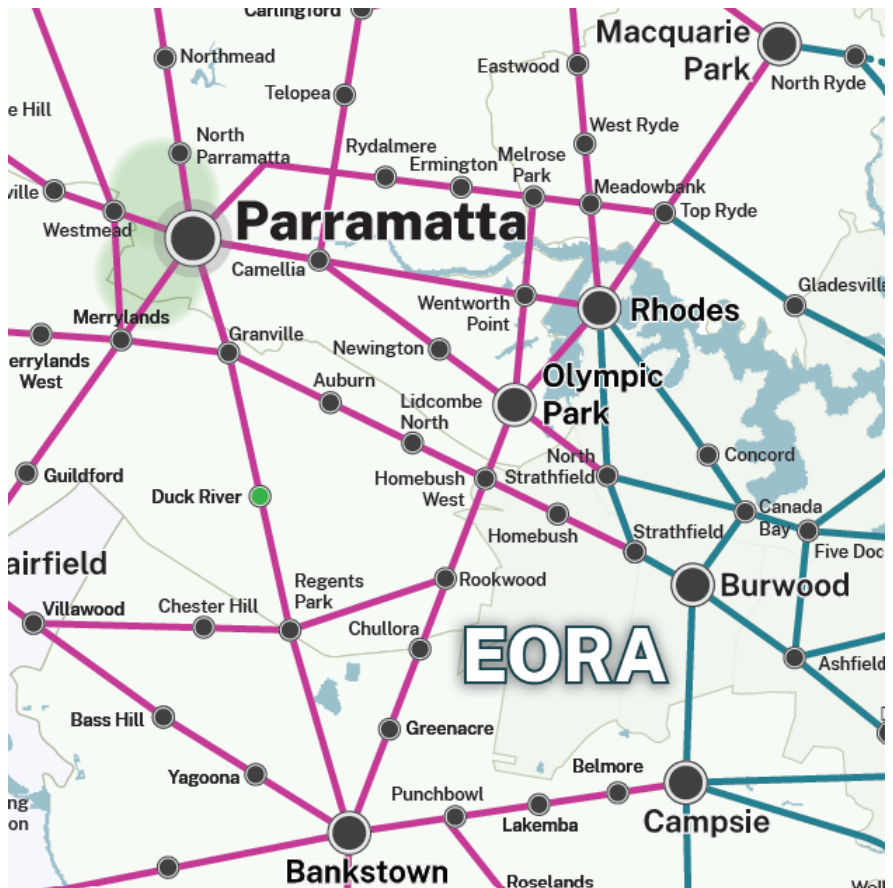


Figure 2:
The 18 Cumberland Active
Transport Corridors
(Source Cumberland City Council)

Figure 3: Extract from the new Strategic
Cycleway Corridor network map
(Source: TfNSW)



Recommendations:

- **Plans for the town centre must address the poor connectivity across the rail lines**

The exact alignment of the strategic cycleway corridors has not yet been determined. The Fairfield to Rookwood corridor may use the Prospect Pipeline corridor in this area before running along the north side of the Chullora freight rail line to meet Amy Street near the Carnarvon Golf Club, bypassing the busy town centre. Or it may follow Amy Street through the town centre, providing easy access to the shops and services, bus stops and the station. It may head north to Kent Street and Kibo Road.

However, a continuous, comfortable and safe route across the rail tracks is essential. A bicycle path is only as good as its weakest link.

The overbridge at the station requires cyclists to dismount, a significant disincentive to mode shift. Widening the footbridge is not practicable, as the stairs down to the platform are on one side of the overbridge, while the lifts to the platform are on the other side.

Council, TfNSW and other stakeholders need to seriously consider possible solutions such as:

- Adding a cantilever active transport bridge to the road crossing with suitable connections to Amy Street and Rose Crescent, or;
- Using the fenced off bridge along the Pipeline corridor with grade signalised or raised crossings at both ends. This would be particularly valuable if the Pipeline shared path is continued towards Potts Hill.

- **Future proof the active transport network**

It is important to future proof shared paths and cycleways by allowing for increased demand at the outset. It is important that faster cyclists can overtake and that pedestrian comfort is never compromised. **A minimum width of 3m** should be achieved at all times with extra width considered where volumes of people walking and cycling may be highⁱⁱⁱ. In busy areas, or on steeper sections, paths should be wide enough to provide separate space for pedestrians.

In particular, the shared path heading north to Kent Street from the Regents Park town centre along the rail line must be upgraded and widened. This path is very narrow and substandard.

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

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

The Bicycle NSW *Build it for Everyone* policy pillar^v sets a standard that bicycle infrastructure should be fit for eight-year-old children or elders to ride on.

The shared paths and cycleways must accommodate a range of mobility options such as cargo bikes and disability scooters. Cargo bikes will increasingly be used for deliveries and have potential to play a huge 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 to enable 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^{vi}.

Adequate path width is key, and it is important to consider turning radius, dropped kerbs and ramps and the design of modal filters to ensure that non-standard bikes not excluded from the network.

- **Reduce speed limits to 30km/h for local streets and shopping areas**

Amy Street, Rose Crescent and Regent St will be important elements of the active transport network, even if the strategic cycleway corridor is located elsewhere. Bike riders will need to access shops, services, bus stops and local destinations on these streets. The public domain plans do not currently show future bike infrastructure. In a busy town centre, separation is not always feasible and a shared path creates conflict between people walking and wheeling. Bicycle NSW recommends a 30km/h speed limit throughout the town centre to allow bike riders to feel safe in the general traffic lanes.

The Vision Zero goal of lowering speed limits to 30 km/h on residential streets and around schools and town centres is considered international best practice and is gaining momentum in Australian and New Zealand. This approach includes pedestrian zones, physical separation between bicycle and car traffic, data-based traffic enforcement and behaviour-change education^{vii}. The British Medical Journal^{viii} found that the use of 20mph (32km/h) 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 (32km/h). Most Australians already support lowering speed limits in neighbourhoods^{ix}. 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^x. The UN resolution of August 2020^{xi} urged all countries to adopt 30 km/h limits in areas where people are walking and playing.

There is sufficient evidence from Sydney and overseas that low speed environments improve safety and amenity. Cumberland should follow hot on the heels of Transport for NSW trials in Manly and the Illawarra by reducing the speed limit to 30km/h and/or nominating Regents Park as a High Pedestrian Activity Area with traffic calming.

It is unfortunate that Transport for NSW, responsible for managing speed limits across the state, has shown little enthusiasm for implementing a widespread 30 km/h speed limit. This lukewarm approach is a barrier to reducing road trauma and improving streets for people, walking and riding bikes. The [NSW speed limit guidelines](#) have recently received a much-needed update and now include official recommendations for 30km/h speed zones. Previously, there wasn't even a mention of 30km/h in the guidelines. It is now easier to implement changes to speed limits in local streets.

30 km/h speed limits are important for mixed traffic 'quietway' cycleways and must be part of Cumberland's toolbox. Another huge benefit of lower speed limits is that vehicle lanes can be narrowed, allowing more road space to be reallocated to wider footpaths and landscaping

- **Be strong about removing surface parking in Regents Park**

Removal of street parking will be necessary in places to create safe raised crossings, wide shared paths and new cycling infrastructure. Council must be strong when faced with local opposition. On-street parking is fundamentally the storage of private property in the public domain. It makes driving easier and generates car trips. When parking is prioritised over space for people, 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 3^{xii}. 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^{xiii}.

The parking provision in Regents Park can cater to the needs of residents, freight delivery, visitors and workers without dominating the urban environment. The parking supply should be reduced in parallel with the development of sustainable access options such as the cycleways and better pedestrian infrastructure. Limited, appropriately-priced parking is a mechanism for discouraging the use of private cars. Parking for bicycles, scooters and car share vehicles must be prioritised over parking for private vehicles.

Remember that the best places always have a parking problem! Council should concentrate on making the best possible use of public space to create a town centre that people will flock to, even if they have to park off-street in a private facility or find a street space a little further away from the shops.

- **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 the raised and signalised crossings so people riding bikes are not required to dismount.

Conclusion:

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. Bicycle NSW wishes to stress 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.

The Strategic Cycleway Corridors program provides impetus to solve connectivity at Regents Park. **It is very important that future aspirations for the corridors that intersect at Regents Park are clearly articulated in the Public Domain Plan.** All stakeholders need to understand what is proposed so that projects can be delivered over time without unplanned obstacles. Council can maintain a clear vision of final outcomes when setting planning controls and applying for grants. Developers can be asked to contribute to public realm projects. Utilities companies, Sydney Trains, and Transport for NSW can plan and manage assets with future cycleways front of mind.

Bicycle NSW looks forward to working with Cumberland Council and other stakeholders to progress important connections in Regents Park. Please reach out to Bicycle NSW and CAMWEST with any questions or help needed. If requested, we would be delighted to assist with advocating for cycling infrastructure in the LGA through our connections with politicians, Transport for NSW and neighbouring metropolitan councils.

Yours faithfully,



Sarah Bickford

Bike Planner
Bicycle NSW



Peter McLean

Chief Executive Officer
Bicycle NSW

ⁱ Sydney Green Grid, Central District. Tyrrell Studio, 2017.

<https://www.governmentarchitect.nsw.gov.au/resources/ga/media/files/ga/plans/sydney-green-grid-plan-4-central-district-2017.pdf>

ⁱⁱ Transport for NSW. 2023, February. Central River City Strategic Cycleway Corridors.

<https://www.transport.nsw.gov.au/system/files/media/documents/2023/Strategic-cycleway-corridors-Central-River-City-overview.pdf>

ⁱⁱⁱ Austroads, 2021. Guide to Road Design Part 6A: Paths for Walking and Cycling AGRD06A-17.

<https://austrroads.com.au/publications/road-design/agrd06a/design-criteria/width-of-paths/shared-paths>

^{iv} 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>

^v Bicycle NSW (2018) Our Policy, [online as at 24/2/2021] <https://bicyclensw.org.au/our-policy/>

^{vi} 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

^{vii} 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/>

^{viii} The British Medical Journal, <https://www.bmj.com/content/339/bmj.b4469.full>

^{ix} What Australians want report, https://irp.cdn-website.com/541aa469/files/uploaded/What_Australia_Wants_Report_.pdf

^x https://www.20splenty.org/20mph_choice

^{xi} 20's Plenty. 2020, August. General Assembly of the United Nations says 20's plenty.

http://www.20splenty.org/un_says_20splenty

^{xii} Sorrel, C. 2017, February. *Why Local Businesses Shouldn't Worry About Eliminating On-Street Parking*. Fast Company.

^{xiii} Transport for London. Walking and Cycling: the Economic Benefits. <http://content.tfl.gov.uk/walking-cycling-economic-benefits-summary-pack.pdf>