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Dear Shirley and Daniela,

Re: Inner West @ 40

Thank you for the opportunity to provide feedback on Inner West Council's study setting out rigorous data-driven evidence to support reduced speed limits within the LGA.

Bicycle NSW strongly supports the proposed initiative to reduce speed limits on most Inner West roads and streets to 40km/h – or below.

An area-wide 40km/h limit is a 'Key Project' under *Principle 2: Improve safety, personal security, and provide equitable access for full community participation* in '[Going Places](#)', Inner West Council's 2020 Integrated Transport Strategy.

Setting a 40km/h speed limit across an entire LGA is ground-breaking in scope and Inner West Council is to be commended on its ambition. The change will significantly improve safety for everyone in the community, particularly people walking and cycling, children going to school and other vulnerable road users outside a car. A motion on the issue received unanimous support when it was brought to Council in June 2022. The importance of this initiative cannot be overstated. Slowing down traffic has a transformative effect on our communities.

However, Bicycle NSW has some **concerns** about the slow pace of the roll out and we use this submission to make a series of **recommendations** for Inner West Council.

The Opportunity

The Inner West@40 report clearly outlines the benefits for **safety**. Lower speeds provide road users with increased reaction time, significantly reducing the likelihood of crashes. Furthermore, in the unfortunate event of a collision, slower speeds can limit the severity of injuries, ultimately saving lives and reducing trauma. Research from across the globe shows that a pedestrian has a 60% chance of survival when hit at 40km/h. This reduces to 10% at 50km/h.

Reduced speed limits **encourage mode shift**. When streets are perceived as safe and comfortable for walking and cycling, more people opt for sustainable modes of travel. This shift reduces congestion and air pollution, benefitting both the environment and public health.

Lower speed limits significantly enhance the **quality of life** for residents and visitors. Noise pollution reduces. Slower traffic allows more children to walk and cycle safely to school, leading to long-term health and psychological benefits. Businesses benefit from increased foot traffic, as more people choose walking, cycling, and other sustainable modes of transportation over cars. Reduced speeds allow vehicle lanes to be

narrowed, providing opportunities for improvements in the public domain streetscape and ultimately community development.

Bicycle NSW is pleased that the **minimal impact on travel times** is highlighted. The Inner West@40 study found that a 40km/h speed limit added a maximum of 26 seconds during weekday peak hours and 37 seconds on weekends to a typical Inner West car trip.

Our Concerns

- The timeframe for change is too slow. The study's Action Plan includes 'critical' steps of undertaking further community engagement and education, promoting low-speed benefits, addressing concerns about lower speeds, and developing business cases. This kicks the can down the road.
- A piecemeal roll-out of the new speed limit is proposed. The Multi-Criteria Assessment (MCA) divides the LGA into distinct zones which are prioritised for staged implementation. This is counter to the ambition set out in 'Going Places' to apply a uniform 40km/h speed limit across the Inner West, to maximise awareness and compliance for drivers.
- State roads managed by TfNSW will be left with existing speed limits. Regional roads, which are funded by TfNSW but managed and maintained by Council, will have a posted speed of 50km/h. This is despite arteries as Enmore Road, Stanmore Road, Frederick Street and Liverpool Road receiving the highest scores in the MCA due to a high concentration of vehicular, pedestrian, and cyclist crashes and their proximity to significant activity areas. And despite existing 40km/h zones on Norton Street, Enmore Road, King Street and Marrickville Road. And despite TfNSW plans to reduce the speed limit to 40km/h on King Street South as part of the Sydney Park Junction project.
- The place-based and priority routes from the newly-endorsed Inner West Cycling Strategy are not considered by the Inner West@40 study. This is indicative of a fundamental lack of alignment between different departments in the municipality. A dearth of joined-up progress on delivering the Inner West Bicycle Network is the inevitable result. As is the continued low modal share for cycling, a relentless over-dependence on motor vehicle usage and a vicious circle of reduced road safety for all.
- The Action Plan's protracted process to identify and roll out physical traffic calming, within a constrained Council budget, before changing a street's speed limit will further slow implementation. In other jurisdictions, new speed limits are applied as default and vehicle speeds monitored to assess driver behaviour. Expensive and disruptive physical traffic calming is then installed where needed to reinforce slower driving.
- No 30km/h zones have been proposed. 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.

Recommendations

- **Introduce a default area-wide 40 km/h speed limit without delay**

Our roads are becoming less safe every year. The [road toll is rising](#). 1184 people were killed on Australian roads last year. This year, the number killed has surged to a staggering 1240. NSW had the second highest increase, with 340 deaths recorded, a 17.2% increase on the 290 recorded the year before. Cycling deaths rose 30.3%, and pedestrian deaths rose 11.3%. That is on top of the hidden road toll of 11,000 each year due to toxic dust and vehicle emissions.

The trauma is fuelled by poor driver behaviour, population increase and increasingly large vehicles, which are safer for the occupants but more dangerous for everyone else on the road. As a consequence, [fewer children are walking and cycling](#) independently than ever before with knock-on impacts on health and wellbeing. Kids are more likely to die prematurely from a car than any other cause.

Lower vehicle speeds make a difference to road safety. There is no time to waste.

- **Roll out the new 40 km/h speed limit everywhere**

It is important for speed zones to be predictable and legible. Varying speed limits inconsistencies across the Inner West LGA makes it difficult for all road users to navigate, creates unnecessary acceleration and deceleration, and is more difficult to legally adhere to. National and international experience is that 40km/h speed limits, comprehensively applied across larger areas, create a more uniform sense of awareness in drivers.

Speed limit inconsistencies also contribute to the need for additional road signs and speed treatments, which chew through Council funds and create visually cluttered streetscapes.

- **Forget prioritization and change all areas simultaneously**

Most of the Inner West's local roads already have a *design* speed of under 40km/h and self-enforce lower speeds. The Inner West@40 study found that 60% of road segments within the Inner West were recorded to have an 85th percentile speed of below 40km/h, as shown by the green and blue lines in the map in Figure 1.

A 40km/h speed limit would reflect existing environmental conditions in many areas and slow vehicles on roads with faster design speeds. Even better, the study showed that streets with an existing posted speed limit of 40km/h have an 85th percentile speed of 32.4km/h. The risk of pedestrian fatality and injury is further reduced when 85th percentile travel speeds are close to 30km/h.

It makes no sense to entrench a patchwork of speed limits with a protracted area-by-area roll-out. Drivers are already accustomed to staying under 40 km/h on the majority of roads, and will adjust easily to an area-wide speed limit. Careful communication will help residents appreciate this. Let's turn the whole map green!

- **There is no need for more 'proof of concept'**

The Balmain Peninsula already has an area-wide 40km/h limit, which has created a safer environment for vulnerable road users.

Furthermore, region-wide 40km/h zones have already been tried-and-tested in Australia. There are 40km/h speed limit CBD-wide in Sydney, Melbourne, Brisbane and Hobart, across the municipality of the City of Yarra, in Victoria, and for all residential streets in the Cities of Unley and [Charles Sturt](#), South Australia.

Drivers adapt quickly and amenity is improved for all road users with reduced noise, improved driveway access and streets that are safer to walk or ride on.

- **Include most state and all regional roads**

As discussed above, many regional and state roads already have sections with an existing or proposed 40 km/h limit. It would be safer and more consistent for all road users if state and regional roads were brought into the 40km/h zone.

Bicycle NSW urges Inner West Council to advocate to Transport for NSW for an area-wide 40 km/h limit. There are a handful of major roads where a higher limit may be appropriate – such as City West Link and Princes Highway – but these should be the exception and can be signed accordingly.

Another important advantage of 40 km/h main road is that the need for signage and gateway treatments at intersections with local roads is reduced. The available budget can be allocated to traffic calming and streetscape upgrades in locations where physical interventions are actually required.

- **Revise the study to align with the Inner West Cycling Strategy**

Key cycle routes are proposed for both major roads and residential local streets. These should be clearly highlighted in Inner West@40 and prioritised for lower speed limits and/or separated infrastructure. And as many roads in the Inner West do not have room for protected bicycle paths, speed reduction is the only option to make community cycling viable.

Including the place-based and priority cycle routes on the Inner West@40maps would help all stakeholders to keep the urgent need to deliver safe cycling facilities front-of-mind. It would help eliminate anomalies such as a 50 km/h limit for Lilyfield Rd - which is also a prioritised route in the TfNSW Strategic Cycleway Corridors. A 50 km/h speed limit is completely inconsistent with the street's role in the cycling network, and its location adjacent to the new Rozelle Parklands sporting venue which will attract many children.

- **Monitor driver compliance and add traffic calming measures where needed**

Once the 40km/h limit has bedded down, vehicle speeds must be monitored to understand where with an 85th percentile speed of over 40km/h persists. These locations can be prioritised for physical traffic calming interventions such as kerb extensions, narrowed lanes, landscaping, chicanes, traffic filters, tactile surfaces and speed bumps.

Council's budget will not extend to reconfiguring every street before the speed limit is changed. Traffic calming features are expensive and should be installed where most needed.

- **Then develop a plan for 30 km/h limits in some areas**

Bicycle NSW aligns with the [Better Streets](#) coalition campaign and advocates that Inner West Council further reduces speed limits to 30km/h on streets with a high concentration of pedestrian activity. We would like to see a network of 30km/h routes linking town centres, schools and other daily destinations. Note that on some streets an official change to the posted limit can be delayed as the design speed is already under 30 km/h.

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 neighbourhoodsⁱ. 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 benefitsⁱⁱ.

Some areas, such as Addison Road, Marrickville Road and King Street, are particularly suitable for a 30km/h limit. Streets which form part of the Inner West Bicycle Network should also be prioritised for a 30 km/h speed limit, allowing a low-cost mixed traffic 'quietway' treatment as outlined in the Cycleway Design Toolboxⁱⁱⁱ.

Over short trips, a 30km/h speed limit makes virtually no difference in travel time. What's more important is prioritizing the safety of our children and the well-being of our communities. By lowering speed limits, we put people first.

The [NSW speed limit guidelines](#) have recently received a much-needed update. We now have official recommendations for 30km/h speed zones and it is easier for councils to implement change.

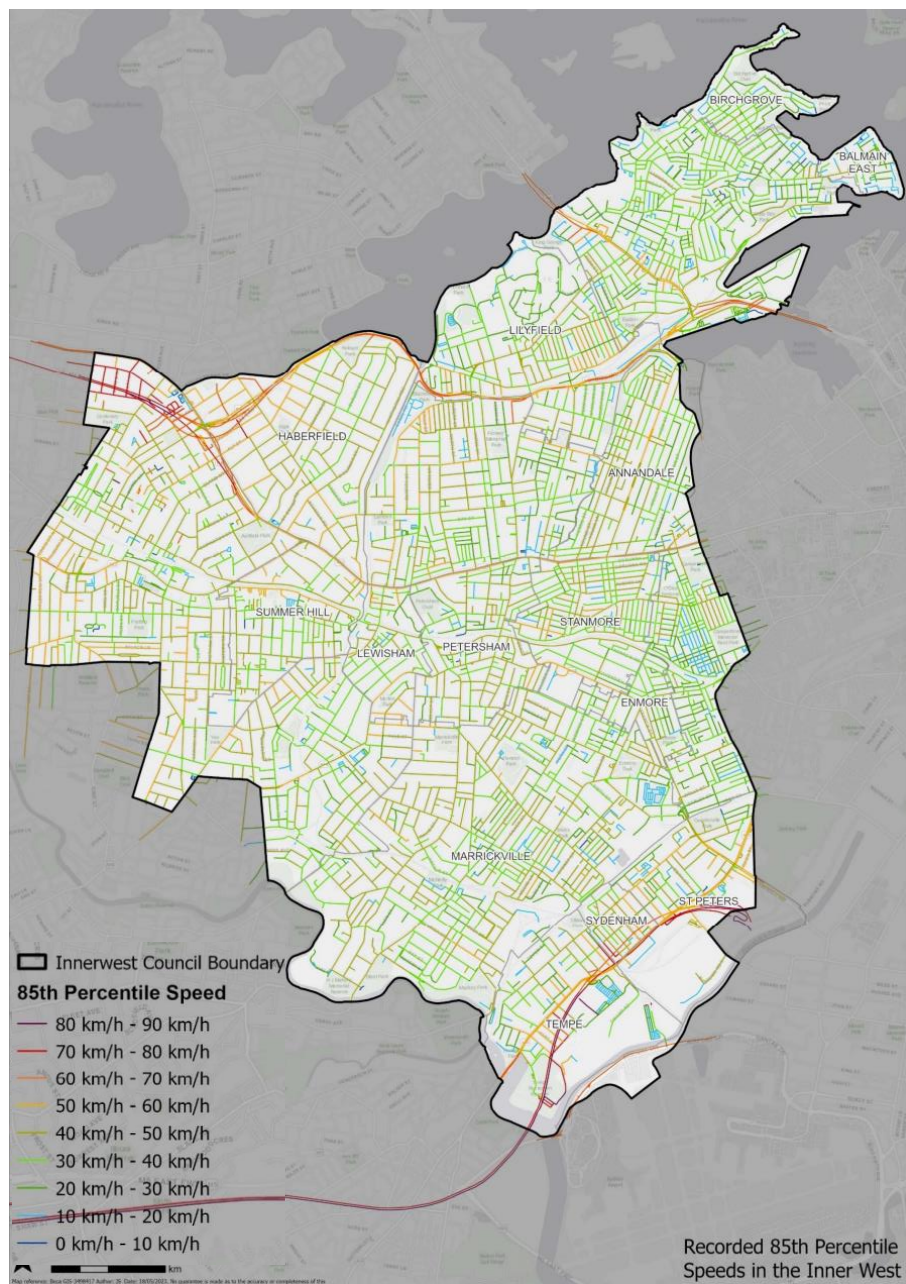


Figure 1: Map showing the current 85th percentile speeds on the Inner west's local, regional and state roads. (Source: Inner West@40)

In Conclusion

Bicycle NSW wholeheartedly endorses Inner West Council's initiative to reduce speed limits to 40 km/h or less, and encourages further steps towards creating a safer, more vibrant, and more active Inner West.

The urgent need to lower speed limits has been a constant theme in our submission to Inner West plans and strategies. Please refer to feedback on the [GreenWay Missing Links](#), [Sydney Park Junction](#), [Iron Cove Creek](#), the [Rozelle Interchange](#) (which focused on the future of Lilyfield Road, City West Link and Victoria

Road) and the Public Domain Masterplans for [Rozelle](#), [Enmore](#), [Dulwich Hill and Marrickville](#). We also wrote comprehensive suggestions at both stages of the development of the [Inner West Cycling Strategy](#).

The transformation of previously thriving streets into noisy, polluted traffic corridors, as exemplified by sections of [Victoria Road and Parramatta Road](#), highlights the negative impact of high-speed traffic on our communities. Prioritisation of active and public transport, space for people and improved amenity are strategic priorities for Inner West, in alignment with NSW Government plans.

Reduced speed limits can have strong support from the community in high volume areas. Change can be hard for communities used to a car-dominated environment after many decades of planning based on easy access and storage for cars. However, it is essential to move on from the status quo if we are to decarbonise the transport sector and create a safer, healthier and more equitable urban environment as Sydney's population grows.

We look forward to walking and riding on more 30 or 40 km/h streets very soon.

Yours faithfully,



Francis O'Neill

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Bicycle NSW



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Bicycle NSW has been the peak bicycle advocacy group in NSW for forty-seven years and has more than 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. 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.

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

ⁱⁱ https://www.20splenty.org/20mph_choice

ⁱⁱⁱ 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>