

Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Submitted [online](#)

22nd February 2024

Dear Sir or Madam,

Re: Explanation of Intended Effect: Changes to create low- and mid-rise housing

Thank you for the opportunity to provide feedback on the proposed reforms to enable more low- and mid-rise housing to be built across the Six Cities.

Bicycle NSW has been the peak bicycle advocacy group in NSW for forty-eight years and has more than 30 affiliated local Bicycle User Groups. Our mission is to ‘*create a better environment for all bicycle riders*’, be they 8 or 80. Bicycle riding has so many benefits. It is a healthy, sustainable form of transport that reduces congestion, gets people outdoors and active, and eases pressure on household budgets. We elevate active transport in all its forms.

Bicycle NSW supports efforts to increase diverse housing supply in well-located areas. However, we agree with many commentators that more nuance is required in the regulation to ensure that missing middle development is appropriate and reflects the character of local neighbourhoods.

We look forward to reading the submissions from planning experts and learning how the proposals could be modified to enhance (rather than override) existing planning strategies, while protecting tree canopy and heritage.

Our concerns

There is a worrying omission from the document – **active transport**.

A word search shows that ‘bike’, ‘bicycle’, ‘rack’, ‘cycling’ or ‘active transport’ are not mentioned in the EIE. This is a **red flag** for Bicycle NSW. Active transport makes higher densities possible. People need safe and comfortable walking routes to access public transport, shops and services.

The proposed standards have no provision for bike parking. And yet bike parking is *more important* than car parking in precincts that aspire to low car use. Well-located and secure bike parking will encourage bike riding and make efficient use of high-value land.

If there is not a legislated obligation to improve streetscapes and provide convenient bicycle storage, people will continue to drive, even when destinations are close. Gridlocked roads and excess traffic do not contribute to liveable, vibrant neighbourhoods.

Project teams are *still* not routinely consulting with walking and cycling groups during planning and construction. As a result, vital opportunities to include best-practice infrastructure are missed.

For example, the proposed low- and mid-rise controls overlap with the Transit-Oriented Development program. Crows Nest, one of the eight precincts identified for the Accelerated Precincts Program, will be

zoned for medium-to-high-density up to 1200m from the station. Of course, active transport is even more critical in TOD precincts. Despite this, plans for the Crows Nest Metro station precinct show very short lengths of on-road painted bicycle lanes. These will be unsuitable for less confident riders. The infrastructure disappears within a block of the station when it should extend for a 1.2km radius. The integration of micromobility into the station has not been properly considered. The secure bike parking is not located near the station entrance and there is no passive surveillance. The racks require bikes to be hung which is not possible if bikes are heavy. Riders must dismount and walk 100m on the footpath to reach the storage shed.

Bicycle User Groups were not consulted by the Metro project team.

Recommendations

- It is essential to incorporate requirements to deliver walking and cycling infrastructure as an integral part of project approvals. All developments, of all scales, must contribute to footpath and streetscape upgrades. The sphere of influence of a project on active transport infrastructure should depend on its scale – i.e. 10m to 1200m.
- Include best-practice minimums for bike parking in the policy. Bike parking should be at ground level in secure spaces with good surveillance. Access from the street must be easy, with wide doors and minimal turns. A variety of racks should be provided to suit different types of bikes. Some racks need to be fixed to the ground to accommodate heavier e-bikes and longer cargo e-bikes, and users who can't lift bikes. The 2016 Austroads report [Bicycle Parking Facilities: Guidelines for Design and Installation](#) remains the best reference.
- Further reduce or remove car parking requirements in areas covered by the new controls. The subject precincts, by definition, have good access to transport and amenities. Reduced parking will discourage vehicle ownership, encourage car sharing and multimodal travel, and free up valuable land for higher values uses – such as more housing!
- Bicycle User Groups must be key stakeholders for precinct redevelopment projects. Close consultation at the very earliest stages will ensure that developments of all scales, and in particular TODs, deliver the very best outcomes for active transport – as well as public health, amenity and liveability.

Please do not hesitate to contact Bicycle NSW if we can provide further input as DPE is developing the final version of the low- and mid-rise housing policy.

Yours faithfully,



Peter McLean

Chief Executive Officer
Bicycle NSW