

Chief Executive Officer
Bega Valley Shire Council
PO Box 492
BEGA NSW 2550

10th July 2024

council@begavalley.nsw.gov.au

Dear Bega Valley Shire Council,

Re: Draft Active Transport Strategy

Thank you for the opportunity to provide feedback on Bega Valley Shire Council's draft Active Transport Strategy (the 'Strategy').

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. We advocate for new cycling routes 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 strongly supports Council's vision for the community to be *'a safe, connected and easy to use walking and riding network that encourages active movement for people of all ages and abilities'*.

The Transport Network Review highlights the lack of progress since the Bega Valley Cycleway was identified in the 2014 Bike Plan. Currently only 2 short sections (Tathra to Kalaru, and Merimbula to Pambula) have dedicated infrastructure for people walking and wheeling. There is a lot of work to do.

However, the draft Strategy does not provide an adequate foundation for Council's development of active transport facilities over the next 7 years. Much more detail is required to support advocacy for Council and State Government funding, and assist all stakeholders to deliver works on the ground.

Active travel projects that stitch the suburbs together and enable people of all ages and abilities to get around without a car are more sustainable than megaprojects. Such projects have big benefits, and not only for reducing pollution and congestion. Active mobility improves public health, activates high streets, helps build social connections and addresses inequality.

In a region where 5% of households have no access to a car and many struggle to afford one, transport poverty is a serious issue. The median household income is \$1,200, much less than the NSW average of \$1,829. 24% of households have a weekly income below \$650, more than the NSW average of 16%ⁱ, and inequality is likely to widen further with rising housing and transport costs. If education facilities, workplaces and community facilities can be accessed safely on foot or by bike, families can be released from the financial burden of owning multiple cars.

In this submission, we draw attention to our **key concerns**, outline the **highpoints** of the Strategy and make some **recommendations** to inform the final version.

Bicycle NSW works closely with Bicycle User Group Bega Tathra Safe Ride (BTSR). We align with its submission, which draws on local knowledge and expertise to make comments on elements of the Strategy. In particular, we agree that the **Bega to Kalaru shared path** should be elevated as a priority so progress can be made over the lifespan of the Strategy.

Our key concerns

The Strategy has significant gaps and lacks important detail and information:

- The actions in the Action Plan are **very vague**. Few concrete projects have been identified. Instead, the table is peppered with commitments to explore connections, investigate interventions and conduct audits. This work should have formed part of the research and background studies to prepare the Strategy. The town maps show 'indicative corridors', 'indicative alignments' and 'indicative locations'. However, to be useful, an active transport strategy needs a clearly defined list of actionable projects with sufficient detail on what needs to be built and where.
- There is no prioritisation framework to determine which projects are at the top of the to-do list. Of course, budgets are very limited. The Action Plan must focus on specific actions can be funded and delivered in the timeframe.
- The draft Strategy lacks any discussion of **strategic context**. For example, two important recent NSW Government documents - the new [Future Transport Strategy](#), which has a key ambition to reduce car reliance and prioritise active, public and multi-modal transport options, and the December 2022 [Active Transport Strategy](#) which strives to double walking and cycling trips and deliver 100km of new cycleways by 2028 - should inform and guide all activity at council level. The Active Transport Strategy must also reflect the goals contained in documents such as Bega Valley Shire's Community Strategic Plan and Local Strategic Planning Statement.
- There is no transport mode hierarchy to help Council make consistent and transparent decisions about road space allocation. The [Road User Space Allocation Policy](#), published by Transport for NSW in early 2021, does not feature. This policy provides local and State governments with a powerful lever to prioritise road space for active transport. Introduce it to councillors in the Strategy.
- The Strategy misses a critical opportunity to build an understanding within the community of the elements that contribute to a safe, direct, attractive, and connected pedestrian and cycling network. Transport for NSW's [Cycleway Design Toolbox](#) and [Walking Space Guide](#) are not mentioned. There is no attempt to articulate what creates [Better Streets](#). There is no discussion of the health, economic, safety and placemaking benefits of active travel. A good active transport strategy will outline the needs of diverse types of pedestrians and bike riders, of differing ages and ability. It will explain the various options for walking and cycling infrastructure, illustrated with clear diagrams, photos from the local context, and examples of best-practice from elsewhere.
- It is very disappointing that there are no actions to **lower speed limits**, despite this being a key community concern in the engagement surveys. Lower speed limits, both in townships and on regional roads, are an essential tool to improve road safety, enhance place outcomes and encourage walking and cycling.
- Council has failed to set **clear and ambitious numerical targets** for future mode share, active travel to school, annual spend, annual expansion of the path network and road trauma reduction. There is a one-line commitment to measure, monitor and improve – but against what? There are a couple of benchmark statistics (eg 40% have not travelled by bike or wheeled device in the last year) but much more data is needed to inform targets and progress.
- **Active transport tourism** is mentioned as an objective but not discussed again. Bike riding facilities are proven to attract tourists and support the visitor economy. New businesses support eco-, active and adventure tourism while existing businesses benefit from increased passing trade and foot trafficⁱⁱ. This merits much more attention in a regional active transport plan.

- Although accessibility for residents of all ages and abilities is clearly a priority there is little said about **emerging forms of micromobility**. This covers more than e-bikes and e-scooters. A wide range of mobility aids which will be increasingly important as the population ages.
- Very importantly, projects and programmes to enable **active travel to school** by Bega's children are ignored by the draft Strategy.
- We also noted that there are no plans outlined for **tree canopy** and shade, or **bike parking** and end-of-trip facilities, or developing multi-modal transport networks

Finally, the graphics are poor and the layout dull. Although concise, this Strategy is not an attractive community-facing document that inspires Bega Valleys Shire's residents to look forward to a better environment for walking, riding and wheeling.

The Strategy highlights

Despite this extensive list of concerns, we can commend the following:

- The mapping of flood constraints for each centre, with a recognition that flood sensitive design is required and alternative routes may be needed to ensure resilience to future climate change. This is an important aspect of transport planning that most councils still ignore.
- The existing active transport networks and points of interest have been clearly mapped and infrastructure gaps indicated.
- There is a strong focus on assessing existing and proposed infrastructure through a lens of what is accessible to non-able bodies people. This aligns well with the Strategy's objectives to deliver safe, connected, inclusive and accessible infrastructure.
- The background research and community engagement has been well summarised.
- Small interventions to connect neighbourhoods are considered as important as big-ticket projects. These smaller changes – raised crossings, complete footpaths, kerb cuts in the right places - make a big difference to access at a relatively low cost.
- Two distinct actions to develop network maps and wayfinding. Active transport is often inhibited by a lack of knowledge about attractive and convenient routes. Even life-long residents of a neighbourhood 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.
- The strategy contains important actions to positive active transport outcomes from new developments, road renewal projects and streetscape upgrades through changes to local planning instruments.
- The Bega to Kalaru project features in the Action Plan as Action BE3. Bicycle NSW has strongly [supported this high-priority share path](#) over the last 3 years. The feasibility study is complete, and several sections of the project are 'shovel ready.' We urge Council to implement to project in stages as funding becomes available.

Recommendations for the final Strategy:

- **Take inspiration from high-quality active transport plans**

Bicycle NSW has been very impressed by recent strategies for regional LGAs by central west consultants Currajong. The excellent [Narrandera Active Transport Plan](#) is a great example.

The Currajong strategies include very detailed action plans, network maps and project sheets. These describe the priority projects in each township and provide a clear framework for council. All stakeholders can see exactly which streets are proposed for new and upgraded paths. Council staff can maintain a laser sharp focus on getting projects delivered over the life of the plan. Interventions are priced so they can go straight into Council’s Delivery Program and Operational Plan.

- **Keep the pipeline of shovel-ready active transport projects stoked**

Council should always aim to have several projects ready to construct if opportunities to apply for grants arise. Cycleways and new footpath infrastructure represent a substantial investment. It is much easier to apply for funding and secure grants for projects if detailed design and community engagement is complete

Remember, projects to reconfigure streets and develop green corridors are not just about cycling. Council must factor in health, wellbeing, reduced trauma, reduced noise and increased tree canopy when assessing business cases and applying for grants.

- **Use best-practice guidance to design paths**

It is important to future proof 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 2.5m should be achieved at all times with extra width considered where volumes of people walking and cycling may be highⁱⁱⁱ (see Figure 1). It is important that faster cyclists can overtake and that pedestrian comfort is never compromised. In busy areas, or on steeper sections, paths should be wide enough to provide separate space for pedestrians.

Bicycle NSW recommends referring to the TfNSW 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 standards.

Figure 1: Suggested shared user path widths (Source: Austroads Guide to Road Design Part 6A: Paths for Walking and Cycling AGRD06A-17)

	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.

All types of bikes should be accommodated by the 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 due to barriers caused by poor urban design. Any measures enabling cycling by disabled people will support a growth in cycling by novice riders, children and older people, and improve conditions for those using mobility scooters^v. This will be an increasingly important consideration as population ages.

- **Make every residential street a cycle street**

In 2016 BIKEast prepared the case for *Safe-street Neighbourhoods*^{vi}. This strategic document has been endorsed by Bicycle NSW and outlines ideas to slow traffic on residential streets to provide a convenient network of cycling routes that complement and connect the priority separated network on key corridors. It is an urban design-based approach to tame the behavior of motorists and make local streets safe for everyone to share and enjoy. Specific design initiatives include:

- Introduce 30km/h speed limits for residential streets and local high streets
- Implement initiatives to reduce traffic volumes - such as street narrowing or closing off some streets (while retaining permeability for people walking or riding bikes)
- Primarily serve residential needs while maintaining essential vehicular access
- Re-landscape land currently covered in bitumen.

This approach aligns with the 'quietway' treatments outlined in the Cycleway Design Toolbox^{vii} which suggests a range of traffic calming interventions applied to ensure very slow vehicle speeds and low traffic volumes.

Calming traffic, lowering speeds and putting people first is fully supported by the [Better Streets for New South Wales](#) campaign, launched in November 2022.

- **Reduce speed limits to 30km/h for all local streets and shopping areas and 80km/h on undivided regional roads.**

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^{viii}. The British Medical Journal^{ix} 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^x. 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^{xi}. The UN resolution of August 2020^{xii} urged all countries to adopt 30 km/h limits in areas where people are walking and playing.

There is sufficient evidence from Australia and overseas that low speed environments improve safety and amenity. 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.

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.

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

There is little discussion in the draft Strategy of improving facilities for riding on regional roads. It is recognised that a small percentage of 'strong and fearless' bike riders prefer the direct routes offered by busier roads and are comfortable in traffic. Cycling can be made safer on these roads with wide shoulders, reduced speed limits, forward stop lines at intersections, head start green lights, and regular maintenance to ensure smooth surfaces. In the longer term, separate cycle paths should be developed along key routes.

- **Set ambitious but achievable targets for new infrastructure and cycling mode share**

The expansion of active transport infrastructure should also be set against a target for new kilometres delivered so that Council can work with a clear mandate from the community and report on progress. Build good infrastructure and people will quickly start to cycle more.

- **Use temporary materials to demonstrate best-practice infrastructure**

Bicycle NSW suggests that Bega Valley Shire Council uses pop-up methods to trial separated cycle paths and other streetscape interventions such as modal filters, outdoor dining areas and parklets. Temporary materials can be installed quickly (Figure 2) to show how unfamiliar infrastructure can fit into the street. Use can be observed over several months, and any issues resolved before permanent infrastructure is constructed.



Figure 2: Pop-up infrastructure in Sydney (Source: Bicycle NSW / Randwick Today)

- **Develop sensational facilities for cycle tourism**

Cycle tourism has enormous potential to attract visitors to regional areas and provide business opportunities for local residents. Bega Valley is close to the Victorian network of rail trails and the developing routes linking the Snowy Mountains to Canberra. The area could become an important hub for cycling tourism.

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 Cycle Trail](#) near Dubbo provides a 400km waymarked loop that has revitalised several country towns since April 2020^{xiii}, attracting thousands of cyclists

to the area for a 5- or 6-day adventure. It is important to work closely with neighbouring LGAs 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^{xiv}.

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.

- **Promote multi-modal options for local and regional trips**

Multi-modal connectivity will improve access within and beyond the LGA for residents of all ages and abilities. The seamless integration of buses, light rail, shared cars, cycleways, secure bike parking and high-quality pedestrian realm is key to making active and public transport attractive alternatives to the private vehicle for more trips, more often.

In a region without trains, Council should work with bus operators to allow carriage of cycles on **front-mounted bike racks**. This is common in Canberra and parts of Victoria and would unlock car-free mobility across Bega Valley Shire where most communities are served only by bus.

In addition, Council should explore exciting opportunities for micromobility technologies to support multimodal end-to-end journeys, such as shared scooter and e-bikes.

The bike can break down the last mile barrier to public transport access at each end of the trip. Facilitating multi-modal transport options may help households reduce the number of cars owned, and the cost of living.

- **Be strong about removing street parking spaces in town centres**

Removal of street parking will be necessary in places to create safe raised crossings, wide footpaths and shared paths, and new social spaces. Council must be strong when faced with resident and business opposition. On-street parking is fundamentally the storage of private property in the public domain. Free and abundant parking encourages car use for short local trips. Filling public space with car parking reduces opportunities for creating attractive places for people that are proven to have higher economic and social benefit.

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

- **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.

- **Ensure that children can walk and cycle safely to school**

According to the NSW School Safety Survey, 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%.

Safe paths to school were unanimously voted as the 'most achievable goal for active transport' at the 2022 Transport for NSW Mobility Summit. A key [Better Streets](#) ask is that 75% of children walk, cycle or use public transport to get to school.

The Active Transport Strategy should have actions supporting school travel front and centre. 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.

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

Climate change is causing an increase in hot weather across NSW. [Maximum summer temperatures on the South Coast](#) are predicted to increase by 2.0°C by 2070 when 10 annual hot days over 35°C are likely. 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 that Bega Valley Shire Council follows the research being undertaken into heat resilient street trees at Western Sydney University through the [Which Plant Where?](#) Project.

- **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.

Initiatives to encourage behaviour change are very important. Green Travel Plans will support new modal choices – maybe start with Bega Valley Shire Council's own staff! Cycle training, cycling promotion, good maps and info, and cycling events should all feature in the actions.

Alongside Ride2School and Ride to Work days, a programme of proactive community initiatives should be developed to help residents build cycling skills and confidence, understand the network as it is delivered, and share the road more safely, whether walking, rolling or driving.

Bega Valley Shire Council should mobilise its artistic capital to create inclusive, fun street activations that connect people and places whilst leaving out the cars. Not only does this stimulate street business and assist with post-COVID recovery through concentration of human-paced traffic; it also warms the community to the significant social and retail benefits of walkable, liveable streets.

Conclusion

Since 2018, there has been a seismic shift in NSW Government policy direction, framed by innovative thinking around 'place' after 70 years of car-centric planning to the detriment of community, urban amenity, walkability, public health and air quality. There is clear agreement from all sides of politics that walking and cycling are essential to enable a healthier, less car-dependent future.

Bicycle NSW wishes to stress that this is the best moment in recent years for local and State governments to collaborate to create a truly transformational network for cycling, but there is no time to waste.

We look forward to reading the final Active Transport Strategy and working with Bega Valley Council to progress the delivery of high-quality walking and cycling infrastructure.

Please reach out with any questions or help needed. If requested, Bicycle NSW would be delighted to assist with advocating for new bicycle facilities through our connections with politicians, Transport for NSW and neighbouring councils.

Yours sincerely,



Sarah Bickford

Active Transport Planner
Bicycle NSW



Peter McLean

Chief Executive Officer
Bicycle NSW

ⁱ Australian Bureau of Statistics. Quickstats for Bega Valley LGA 2021. <https://abs.gov.au/census/find-census-data/quickstats/2021/LGA10550>

ⁱⁱ Jerome N Rachele. Do the sums: bicycle-friendly changes are good for business, The Conversation [Online as at 24/2/2021] [Do the sums: bicycle-friendly changes are good business \(theconversation.com\)](https://theconversation.com/do-the-sums-bicycle-friendly-changes-are-good-business)

ⁱⁱⁱ 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>

^{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 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
- ^{vi} BIKEast. (2016). Safe Street Neighbourhoods. http://www.bikeast.org.au/wp/wp-content/uploads/2017/02/BIKEast_201610_Safe-street-Neighbourhoods_Appendix-A.pdf
- ^{vii} 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>
- ^{viii} 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/>
- ^{ix} The British Medical Journal, <https://www.bmj.com/content/339/bmj.b4469.full>
- ^x What Australians want report, https://irp.cdn-website.com/541aa469/files/uploaded/What_Australia_Wants_Report_.pdf
- ^{xi} https://www.20splenty.org/20mph_choice
- ^{xii} 20's Plenty. 2020, August. General Assembly of the United Nations says 20's plenty. http://www.20splenty.org/un_says_20splenty
- ^{xiii} Central West Cycle Trail. <https://centralwestcycletrail.com.au/>
- ^{xiv} AMB Magazine. 2021, July 29. Riding to the edge. <https://www.ambmag.com.au/feature/riding-to-the-edge---understanding-logging-around-blue-derby-trails-568005/page3>