

Scott Wells
Principal Traffic Engineer
Shoalhaven City Council
PO Box 42
NOWRA NSW 2541

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Scott.Wells@shoalhaven.nsw.gov.au

Dear Shoalhaven City Council,

Re: Draft Shoalhaven Active Transport Strategy

Thank you for the opportunity to provide feedback on Shoalhaven'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 effort to develop a robust, workable and meaningful document that establishes clear and measurable goals for the future of active transport in Shoalhaven.

Since the first Pedestrian Mobility Access Plan (PAMP) in 2002, Shoalhaven City Council has made good progress developing 275km of path networks focused on key towns and villages, including off-road footpaths, SUPs and formal road crossings.

The new draft Active Transport Strategy includes 900 costed projects. These are ranked based on new selection criteria that was refined and simplified after a period of community consultation in 2023. This provides Council with an action plan for continuous improvements to paths and crossings, supports advocacy for Council and State Government funding and assists 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 – even simple kerb ramps and raised crossings - 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 [4.4% 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 \$1,250, much less than the NSW average of \$1,829. 23% of households have a weekly income below \$650, more than the NSW average of 16%, 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 addition, Shoalhaven has [a much older population](#) than the NSW average. 28% of residents are over 65, compared with 18% across the state. As people age out of driving, it is essential to provide alternative ways to get around so they can remain healthy, active and connected to community and services.

In this submission, we draw attention to some concerns about the draft Strategy and make several **recommendations** to inform the final version of the Active Transport Strategy.

Bicycle NSW works closely with Bicycle User Group Shoalhaven BUG. We align with its feedback. We also support the excellent submission from Illawarra Shoalhaven Local Health District which draws on local knowledge and expertise to make comments on elements of the draft Strategy.

Recommendations:

- **Develop a concise and easy-to-digest summary document**

We understand that the Strategy was conceived primarily as a working document for staff and severe budget constraints prevented a complete refresh. However, the exhibited document is far too long and very muddled. No active transport strategy should have 200 pages. The many pages of background research should be in an appendix or separate report. The tone is conversational and rather unprofessional. There is a *lot* of repetition. The graphics are unlabelled and not always relevant to context. Some key higher ranked projects have been listed right at the end of the draft Strategy but most of these do not have maps.

It is important to produce a clear and succinct report for the community and councillors. The text and images should inspire residents and help build understanding of what good active transport infrastructure looks like, why it's important, and what council plans to build in the next 5 years. Only highlights of the data, strategic context and actions are needed. The three sets of priorities should be merged.

Shoalhaven should take inspiration from high-quality active transport plans produced in other jurisdictions.

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 longer strategy for [Snowy Monaro](#) is very relevant to Shoalhaven in terms of size, National Parks, tourism, and some larger towns.

These strategies include very detailed action plans, network maps and project sheets. Only a handful of projects are highlighted for each town. There may be a background document with dozens of other projects but the priority projects in each township are meant to be tackled over the life of the plan. All stakeholders can see exactly where new and upgraded paths are proposed. 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.

Of course, more aspirational projects can be included too but the focus is on creating a clear list of deliverables.

For guidance on selecting images for the Strategy – and remember that a picture tells a thousand words – please refer to the excellent new [Healthy Streets Imagery Guidance](#).

- **Advocate very strongly for funding to deliver projects.**

Bicycle NSW recognises the considerable challenges for infrastructure delivery in the Shoalhaven. The 50 towns and villages are spread over a large geographical area and the topography and isolation makes construction complex. There is a huge backlog of urgent repairs following the 2019 bushfires and 23 registered floods in the last few years. Meanwhile, state government funding has been cut.

A collaborative approach from all levels of Government is urgently required to put a real dent in the backlog of active transport projects. Central to this must be a significant increase in State and Federal funding for active transport infrastructure, with fair and reasonable allocations to regional and rural communities.

In addition, Council needs to provide a consistent, year-on-year flow of funds. Council must also continue to pull every lever possible to ensure that development delivers the very best outcomes for path networks and the public realm.

With a steady flow of resources, staff can plan the delivery of active transport infrastructure in a timely and cost-effective manner. In particular, the project development stage would benefit from a greater allocation of funding. A pipeline of shovel-ready active transport projects must be kept stoked, to ensure that detailed design and community engagement is complete so grant applications have a good chance of success.

Bicycle NSW can assist by writing letters of support and directly engaging with relevant decision makers at Transport for NSW and state government on Shoalhaven's behalf. Of course, we will continue to advocate for increased active transport funding for NSW in every conversation with the Minister for Transport.

- **Embed a road user hierarchy for Shoalhaven in the Strategy**

Although there is some discussion in the draft Strategy about hierarchy, this should be clarified and formalised. It is very helpful to put a transport mode hierarchy front and centre of the Strategy to help all stakeholders make consistent and transparent decisions about allocating funding and space to road users. People walking and in wheelchairs are the top priority in towns and their needs should be met first, followed by people riding and using public transport.

The hierarchy should be developed specifically for the Shoalhaven context and demographics. An example from Clarence Valley is shown in Figure 2.

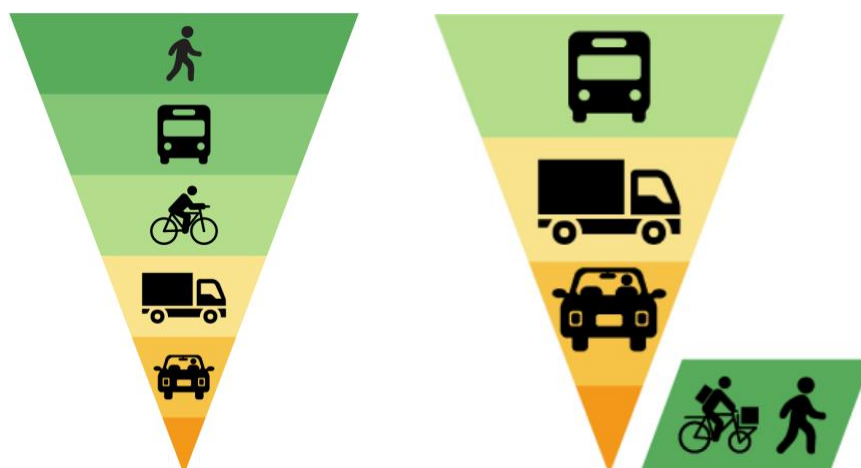


Figure 2:
Clarence Valley's mode hierarchy for townships (left), and regional roads (right) is clearly expressed. People on foot, public transport and bicycle are prioritised in the townships. On regional and rural roads buses and freight come first. Where walking and bike riding is accommodated, this will be on a separated piece of infrastructure parallel to the main corridor
(Source: Clarence Valley Council)

A hierarchy makes a clear statement that the storage and use of private cars cannot be prioritised going forward if Shoalhaven City Council wants to deliver an equitable, low-carbon transport system that accommodates expected population growth.

Council's proposals to change the way street space is used are bolstered by the [Road User Space Allocation Policy](#), first published by Transport for NSW in early 2021. It has recently been updated with a much stronger mandate to find a better balance between movement and place. Transport for NSW must adhere to these principles ahead of any guidance that seeks to protect or maintain private vehicle level of service.

The policy provides local governments with a powerful lever to prioritise road space for active transport and should be discussed in the Strategy. The TfNSW [Road User Space Allocation Procedure](#) contains guidance on the application of the policy.

- **Aim to meet best-practice guidance to design paths**

It is important to future proof paths by allowing for increased demand at the outset. Bicycle NSW recommends referring to the TfNSW [Cycleway Design Toolbox](#) 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, disability scooters 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 are not excluded from the network. Paths should be wide enough for overtaking.

2.5m is recommended, and 3.0m is better, but Austroads does permit narrower paths in some contexts when volume of pedestrians and cyclists are low.

Bicycle NSW supports Council's approach of taking a flexible approach to path widths. The focus must be on delivering more paths and safe crossings. A narrow path, at the bottom end of the Austroads range, can be a sensible compromise to meet active transport goals with a highly constrained budget. It is also important to maintain tree canopy, as shade is more important for walking comfort than path width.

Transport for NSW's recent push for all grant-funded infrastructure to meet the Cycle Design Toolbox standards has led to many regional projects failing to win grants. This has severely held back progress for many councils. Bicycle NSW will advocate for the NSW Government to apply more flexible rules that recognise the local context.

Note that where space is an issue, the application of the Road User Space Allocation policy and procedure can help Councils navigate the competing needs of different transport modes and create space for people walking and cycling.

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

The 'quietway' treatments outlined in the Cycleway Design Toolbox are discussed but underplayed in the draft Strategy. Bicycle NSW recommends that Shoalhaven doubles down on projects that use a range of

low-cost traffic calming interventions to ensure very slow vehicle speeds and low traffic volumes on local streets.

Approaches to developing quietways in different jurisdictions are discussed in our article [Making Local Streets Safe for Bikes](#).

In 2016 Bicycle User Group BIKEast prepared the case for [Safe-street Neighbourhoods](#). 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.

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

- **Advocate for reduced speed limits with a target of 30km/h for all local streets and shopping areas and 80km/h on undivided regional roads.**

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.

The draft Strategy acknowledged the global trend to reduce speeds and the benefits for expanding cycling networks. However, there are no actions to lower speed limits, and ideal numerical speed limits are not articulated.

Bicycle NSW recognises that councils do not control posted speed limits. However, Shoalhaven City Council can advocate to Transport for NSW and ensure that the design speed of new and upgraded roads will, wherever possible, accommodate future changes to the speed limit.

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.

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.

There is sufficient evidence that low speed environments improve safety. The [British Medical Journal](#) 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). The [UN resolution of August 2020](#) urged all countries to adopt 30 km/h limits in areas where people are walking and playing.

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, improving amenity for residents and visitors.

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

The draft Strategy highlights the importance of improving facilities for riding on rural roads. Bicycle NSW commends Shoalhaven City Council's ongoing efforts to provide wide sealed shoulders wherever possible.

Reduced speed limits, forward stop lines at intersections and head start green lights are additional measures that help keep bike riders safe.

Regular maintenance is crucial to ensure smooth surfaces, and it is challenging for Council to keep on top of sweeping and repairs, particularly in heavily vegetated areas. Bicycle NSW recommends including minimum routine maintenance requirements in the Active Transport Strategy so this work is not forgotten when allocating resources in the LGA.

Of course, funding constraints limit the roll-out of wide sealed shoulders and other upgrades to rural roads. It is essential that all stakeholders grab opportunities to include improvements to shoulders and path networks whenever roads are being repaired or resurfaced. Bicycle NSW will assist Shoalhaven by advocating for the scope of emergency repair projects to be expanded to allow simultaneous active transport upgrades.

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

The draft Strategy contains robust and welcome discussion about the impact of unmanaged parking on place and the need to carefully manage future demand in the Shoalhaven.

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 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.

Bicycle NSW knows that concerted effort is currently required to persuade TfNSW to install or modify traffic signals to ensure good conditions for pedestrians, and we will support Shoalhaven to push for change where a need is identified. [Bicycle NSW continues to lobby](#) at high level for a new approach to designing signals.

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

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.

Wayfinding must support residents and visitors by clearly articulating and communicating the most efficient and safest way to reach a destination on foot or bike. Signage and maps must be updated regularly. The signage style should be consistent throughout each town and reflect the diversity of the community.

The draft Strategy has good actions to improve wayfinding, but this could go further. Bicycle NSW recommends including an action to overhaul wayfinding across the LGA.

Council should also develop a riding and walking guide to provide wayfinding information and promote active transport throughout the region. Bicycle NSW recently helped Kiama Council develop the excellent [Kiama Rides](#) booklet.

Alongside physical maps and signs, a digital network map should be developed and maintained. Shoalhaven's PAMP map is excellent as a working document for staff and community. It is not very useful for route planning using existing infrastructure. Lake Macquarie Council has an excellent online [Cycling Routes Wayfinding Map](#) that should provide inspiration!

- **Develop sensational facilities for cycle tourism**

Walking and cycling tourism is only briefly touched on by the draft Strategy. Bike riding facilities are proven to attract tourists and boost the visitor economy. New businesses emerge to support eco-, active and adventure tourism while [existing businesses benefit](#) from increased passing trade and foot traffic. This merits much more attention in a regional active transport plan.

The Shoalhaven has incredible natural assets. 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, 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.

Mapping and ride guides have been discussed above. Share bike rental hubs should be provided in tourist centres to ensure access to bike riding experiences for all visitors. Facilities for e-bike charging, bike maintenance and bike storage need to be created in key locations.

Bicycle NSW is pleased that the Shoalhaven City Council clearly recognises the value of mountain bike trails for locals and visitors. Consistent support and investment are wise. 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.

- **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.

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.

Shoalhaven City Council should promote transport options that combine walking or cycling with buses and trains in maps, guides, and council communications. Work with Transport for NSW to provide high-quality bike parking at bus stops and train stations.

As most of the LGA is not accessible by train, Council should lobby 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 Shoalhaven.

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

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

Bicycle NSW suggests that Shoalhaven City 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 3) 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 3: Pop-up infrastructure in Sydney (Source: Bicycle NSW / Randwick Today)

- **Develop compelling storytelling, communication and promotion 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 Shoalhaven City 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.

Shoalhaven City 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-disaster 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.

Of course, a major step change in funding for active transport infrastructure is critical to deliver Shoalhaven's long list of projects. We reiterate that Bicycle NSW will assist with advocacy for funding through our connections with politicians, Transport for NSW and neighbouring councils.

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

Yours sincerely,



Sarah Bickford

Bike Planner
Bicycle NSW



Peter McLean

Chief Executive Officer
Bicycle NSW