

Transport for NSW
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28th February 2025

Dear Transport for NSW,

RE: Draft South East and Tablelands Strategic Regional Integrated Transport Plan

Thank you for the opportunity to provide feedback on the [Integrated Transport Plan](#) for the South East and Tablelands region (the 'Plan').

Bicycle NSW has been the peak bicycle advocacy group in NSW for forty-nine years and has over 30 affiliated local Bicycle User Groups. Our mission is to *'make NSW better for all bicycle riders'*. We advocate for new cycling routes that 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 is very supportive of the **transport vision** for a South East and Tablelands *"transport network that is safe, resilient, efficient and sustainable, offering a range of flexible and accessible travel options meeting the needs of current and new residents, workers and visitors across communities for access to essential goods and services."*

We are pleased to see a clear list of achievable actions, with a mix of hard infrastructure and soft policy and service measures. Improved public transport is clearly a strong focus area, supported by new walking and cycling paths to expand opportunities for multimodal transport.

There is some encouraging discussion on cycle tourism and the development of rail trails, with the Monaro and Goulburn to Crookwell rail trails well-supported.

A commitment to NSW Government Net Zero targets is clearly established. And there is an important focus on building resilience in the transport network. Active transport plays a huge role in providing customers with viable alternative transport options during increasing natural disaster events.

The [Road User Space Allocation Policy](#) is mentioned and its role in placemaking is introduced. Lowering speed limits get more bandwidth than in the Hunter SRITP, with a commitment to undertaking speed zone reviews.

However, **Bicycle NSW has many concerns about the Plan**, which appears to take a step backwards from the regional transport plan that was published 2023. Please refer to the Bicycle NSW submission on the 2023 [South East and Tablelands Regional Transport Plan](#).

This brief submission highlights these concerns and makes some suggestions for the final plan. We have not provided detailed recommendations, or extensive links to evidence and data to support our views. This submission is not directed at council staff who need this kind of guidance on achieving better streets and places. The teams at Transport for NSW should be very well versed in best-practice transport policy.

Concerns and comments:

- The Plan includes **numerous road expansion projects**. Of the 51 initiatives, 19 relate to highway upgrades. Despite good intentions to prioritise public and active transport, the car-first thinking of the last 70 years predominates. The result will be wider roads, new slip roads and additional capacity, allowing more cars to travel at faster speeds. **It is not possible to meet climate goals by repeating past mistakes**. And intersection 'upgrades' rarely make things better for pedestrians.

We suggest that Transport for NSW takes inspiration from [Wales](#). The Welsh Government has recently [reviewed](#) 59 major road building projects against environmental and safety criteria. Only 17 of the road projects will go ahead, with design changes to ensure they don't induce car use or higher speeds. Going forward, new roads will only be built if their proponents can prove they will support the transition to non-car travel, help Wales adapt to the impacts of climate change or improve safety with relatively minor changes.

- There is **no transport hierarchy** for different road users to help all levels of government make consistent and transparent decisions about funding, road space allocation and delivery priorities. A hierarchy with people walking at the top should be clearly articulated to the community and all stakeholders in the Plan.
- Significant **mode shift** away from private cars is essential to achieve Net Zero. Mode shift is mentioned just twice in the Plan! And the only target around modal share is to 'stabilise' vehicle volumes. The Climate Council calculated in [Shifting Gear](#) that no more than 36% of trips should be taken in a car by 2030, half the current NSW average rate of around 80%. Private vehicle kilometres need to be converted to shared and active travel [at the rate of around 5% a year](#). The Plan must stimulate a radical change to our transport system with firm numerical targets.
- **Key NSW Government policies and strategies** are largely ignored by the Plan. Documents such as the [Design of Roads and Streets](#) manual, [Future Transport Strategy](#), the [Active Transport Strategy](#), and the Movement and Place Framework are only mentioned once or twice and don't directly inform any of the initiatives or indicators. There is also no discussion of the type of active transport infrastructure that should be delivered or any reference to Transport for NSW's own Walking Space Guide or Cycleway Design Toolbox.

These strategies and documents reflect a seismic shift in Transport for NSW policy direction, framed by innovative thinking around 'place' after 70 years of car-centric planning that focused on movement to the detriment of community, urban amenity, walkability, public health and air quality. They should be front and centre of the South East and Tablelands' transport planning.

- The Plan does not discuss **15-minute neighbourhoods**, and although land use planning is touched on, there are no specific actions around promoting denser, mixed-use development that facilitate more sustainable transport.
- The **indicators** in the appendix are very vague and have no numerical metrics. It is not good enough to aim for indicators to trend up or down without real and meaningful targets. As an example, the Plan does not specify how much walking and cycling infrastructure is needed to complete networks.
- There is no exploration of **the 'vision and validate'** approach to transport planning. Current travel patterns are not sustainable, and the status quo must not dictate future transport provision. It is recognised that travel behaviour can and will change over time. The Plan must articulate a better future that people will be excited about working towards.

- There is not enough emphasis on **safe speed limits** in the Plan and no concrete initiatives to lower speeds. '30km/h' and '40km/h' are found just once in the 104 pages, despite these being best-practice speed limits for urban streets.

Speed limits should be lowered to **80km/h on undivided regional roads, 40km/h in urban areas and 30km/h for all local streets and shopping areas**. Timeframes for speed reductions should be **short term**. There is no reason to delay!

The UN resolution of August 2020 urged all countries to adopt 30 km/h limits in areas where people are walking and playing. 30 km/h has been shown as an optimal speed limit to allow people driving and cycling to share the road safely and is becoming a standard speed limit in many parts of the world. 30 km/h speed limits reduce the need for separate bicycle infrastructure on local streets. 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.

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.

- Trees are not mentioned at all, even though shade from the **tree canopy is critical** for a liveable and usable transport network. Climate change is causing an increase in hot weather in NSW. Maximum summer temperatures are predicted to increase by 2.3°C by 2070 when 40 annual hot days over 35°C are likely. Tree canopy must be created 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.
- It is disappointing that there are no initiatives in the Plan to facilitate the **transport of bikes on trains and buses**. Although bikes can be wheeled onto the CityRail services to Goulburn, they must be boxed and weigh under 20kg to travel any further into the region. Many bicycles, such as e-bikes and tandems, do not fit within the size and weight limits. Buses rarely accept bikes of any type. This is a serious impediment to local connectivity and bike-related tourism.

We urge Transport for NSW to accelerate adaptation of the rolling stock to accommodate roll-on bikes on trains, in [line with Bicycle NSW advocacy](#), and include this as an initiative in the Plan. We also suggest that bus operators allow bikes to be carried on buses, either in the luggage compartment or on a rack mounted on the front of the bus. This will allow one-way trips, help solve 'last mile' barriers to public transport use, open up the cycle network to a wider range of users and provide access to trails and everyday destinations without using a car.

- Finally, the document is **long and very repetitive**. It does not tell a compelling story to the community about the future of the South East and Tablelands.

Conclusion:

Bicycle NSW urges Transport for NSW to review the draft Plan to address our concerns.

Transport connects us to everything: our communities, workplaces, friends and family, education, healthcare and all the essential services we need. Our ability to get around – safely and without barriers – is fundamental to our quality of life, wellbeing and participation in society.

A fundamental shift to active and public transport is required to maximise access for everyone in the community, improve the amenity of our towns and suburbs, and reduce emissions on the long road to Net Zero.

There has never been a better time to build for active transport. Bicycle infrastructure has a low cost per km, offering better value than road projects and supporting Councils' financial sustainability. Over 100km of bike paths can be delivered for the cost of 1km of new road. Studies have shown that 70% of people in NSW either ride a bike now or would start to ride if safe infrastructure was provided.

Bicycle NSW would like to be involved with the delivery of future active transport infrastructure in the South East and Tablelands. We can offer expert advice at each stage, from the planning of walking and cycling networks to the detailed design of paths and intersections. Many of the relevant technical standards, policies and guidelines are drawn together on our [website](#).

We look forward to working with Transport for NSW, Local Government Authorities and local Bicycle User Groups to grow active travel in the South East and Tablelands region.

Yours sincerely,



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