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State Planning Provisions Review 2022

Bicycle Network represents more than 48,000 bicycle riders nationally and is committed to making it easier for more people to ride more places more often.

Mandatory end-of-trip facilities for bike riders in new developments and retrofitted into existing buildings would be an important improvement and would help people to make the decision to ride.

The government committed to us in 2018 to working towards the goal of end-of-trip facilities in new buildings, initially through the review of the Walking and Cycling for Active Transport Strategy and more recently through the review of these provisions in conjunction with the Active Transport Strategy review.

We have also called for direction from the Tasmanian Government on the type of cycling infrastructure to be built on new and upgraded roads to enable the creation of All Ages and Abilities networks. This sort of direction should be included in planning laws so new subdivisions and road upgrades automatically include cycling facilities that the majority of the population would be happy to ride on.

Bicycle Network recently made a submission to the Tasmanian Planning Policies consultation and similar concerns are raised in this submission. We also made a submission in 2016 when the State Planning Provisions were first introduced and much of that submission is reiterated here.

Reform is needed

Our planning laws prioritise private car travel over active transport like riding and walking, which is out of step with national and international best practice.

While the majority of people travel by private car, it could be argued that is the case because our planning system makes that the easiest way to get around. If we had separated cycling facilities and secure bike parking at all destinations, then bike riding would be more prevalent.

We'd like to see more balance in the planning system to encourage cycling and walking for transport, especially for short trips, but also to link growth areas with urban centres, especially as electric bicycles mean more people are able to ride further than on conventional bicycles.

The main elements that need to change in our current planning provisions are the explicit provision of bike parking and end-of-trip facilities for employees, and for residents in multi-unit blocks.

We also need a requirement for safe cycling paths and on-road separated cycleways on new and upgraded roads.

Mechanism for delivering government visions

Our planning laws are one of the most important mechanisms governments can use to shape the way land is settled and used.

How land is used has an impact on many other areas of government responsibility.

Encouraging more people to ride bicycles can help the government achieve goals outlined in its health, road safety and environmental strategies.

- *Healthy Tasmania Five Year Strategic Plan 2022–26* – Fewer than 2 in 10 adult Tasmanians get the physical activity they need to stay healthy and only 3 in 10 of our children are not active enough. It's why the Healthy Tasmania plan has committed to “plan and build places that support health and wellbeing and physical activity” and “build infrastructure that makes walking, cycling, accessibility and public transport a safe and viable alternative to driving”. It would be easier to achieve these goals if such infrastructure was required by our planning laws.
- *Towards Zero – Tasmanian Road Safety Strategy 2017-2026* – bicycle riders unfortunately appear in the serious and fatal injuries in our road toll every year. Building more separated cycleways and wide, sealed shoulders can help reduce the risk of people being hit by drivers.
- *Climate Change (State Action) Amendment Bill 2021* – proposes a target of net zero emissions by 2030 and five-yearly emission reductions plans for sectors, including transport. Transitioning to electric cars will take years because of the great expense, whereas helping people to ride bicycles and electric bicycles could help us reduce emissions faster and have the lasting benefit of fewer cars on the road creating traffic congestion.

Fixing loopholes & reducing floor space

The review should also fix loopholes in the way planning laws are applied.

We've heard that developers can walk away from a build without any bike parking and end-of-trip facilities being included. That's because bike parking requirements are based on the type of business use and that's not determined until the spaces are leased. Builders can leave an empty space for bike parking, but that space could be used for other purposes.

The provisions should be changed so developers must include bike parking and end-of-trip facilities based on likely employee and visitor numbers for the type of building.

Another loophole occurs when multiple small businesses are proposed for a building, with none of them reaching the minimum floor space to require bike parking. The floor space applicable for these sorts of land uses need to be reduced substantially to capture small as well as medium and large businesses.

The requirement in a few of the categories for 1 bike space per 500m² of floor space is very low compared to other states which use similar methods of calculation. In certain sectors like Business and Professional where open plan office design means 30 or so people may be sitting in a space that size, consideration should be given to basing parking on potential employee numbers for the space.

The building Bicycle Network is located in, for example, is professional and about 1000m². It has multiple tenancies in one half and one tenant in the other half, this means if it was being built tomorrow it would only need one or two hoops outside. We regularly have up to 9 or so bikes in our staff bike parking area in the secure car park and visitors use the two hoops out the front of the building. And this is in a building where the space is not being used as intensively as it could for employee seating.

Developers should also be required to demonstrate that adequate bike parking already exists in a building before applying for an exemption for an addition or renovation to the building. We recently saw the situation where the Royal Hobart Hospital had a new wing built without any bike parking included, even though there is no secure bike parking away from public access for many of its staff.

Changes to the current Planning Provisions

P 22 General Residential Zone requirements – 8.6.2 Roads (h) and p 21 of the Inner Residential Zone code 9.6.2 Roads (h).

Performance Criteria – *(h) the need to provide bicycle infrastructure on new arterial and collector roads in accordance with the Guide to Road Design Part 6A: Paths for Walking and Cycling 2016;*

There is a more comprehensive cycling guide produced by Austroads called *Cycling Aspects of Austroads Guides 2017* which may be a more suitable guide to cover all the possibilities of providing cycling access, or should be at least used in addition to the guide to paths.

But, ideally, the Tasmanian Government would have its own directions on cycling infrastructure as other states have done rather than planning laws having to “have regard to the need” for a wide range of infrastructure options. Other states have produced their own guidance or direction to ensure the right infrastructure response for the conditions is used.

We know, for example, that infrastructure physically separated from traffic encourages more people of all ages and abilities to ride who wouldn't do so if that separated path or lane wasn't there, but in the Austroads guide it appears as one of many options.

We'd like to see the government produce a design guide for cycling infrastructure in Tasmania that clearly outlines the standard of infrastructure that must be built on roads according to the expected number of cars and speed limit of the road and needs of the community. On some roads in built-up areas of Tasmania this would be separated cycling infrastructure because of high speed limits and volume of cars and on others that are low speed and low volume it could mean lower speed limits and painted lanes/positioning.

Changes to the Parking and Sustainable Transport Code

The Parking and Sustainable Transport Code governs the nitty gritty of what bicycle parking should look like, where it should be located and how many spots provided.

The objectives outline the goal of making it easier to ride a bicycle but unfortunately the bike parking requirements do not reflect these objectives:

- C2.1.1 To ensure that an appropriate level of parking facilities is provided to service use and development. [it's not clear whether this includes bike parking or is just about cars]
- C2.1.2 To ensure that cycling, walking and public transport are encouraged as a means of transport in urban areas.
- C2.1.3 To ensure that access for pedestrians, vehicles and cyclists is safe and adequate.

Further into the code, C2.6.7 seems to concentrate on bike parking for visitors (short-term parking) so it should say this clearly.

It does not define what safe and secure bike parking means. Providing a hoop out in the open is not always secure as thieves can get to bikes and cut locks, which is why other measures need to be implemented such a lighting, CCTV, and being put in a zone where employees or visitors can see the bike parking area.

In C2.6.7, A1 it's not clear why A1 only kicks in for 5 bicycle spaces or more, all of the requirements would be just as important for 2, 3 or 4 spaces. The minimum number requirement should be removed, or at least lowered.

The code doesn't differentiate between the type of bike parking to be provided for staff and residents, and visitors. This is an important distinction as bike parking for visitors is short term and needs to be near an entrance and easily accessible, whereas staff bike parking is long term and should be undercover, secure and not accessible to the public. Although providing undercover parking is also important for visitors.

Good guidance for bike parking requirements is the Austroads Research Report – *Bicycle Parking Facilities: Updating the Austroads Guide to Traffic Management*. It makes the following distinction between different types of bike parking.

Table 4.1: Bicycle parking security levels

Security Level	Style	Suitability
A	Bicycle Locker	Long-term parking that includes overnight storage.
B	Bicycle Cage	Day parking for staff, students and public transport users. Some overnight parking in residential buildings.
C	Bicycle Rack	Short-term parking such as visitor or customer parking.

Source: AS 2890.3:2015

This reflects the *Australian Standard AS 2890.3:2015 Parking facilities - Part 3: Bicycle parking*, which determines the three classes of bike parking.

While the code directs developers to follow the Australian standard in terms of the type of Class C bike parking to be provided, it does not direct developers to implement class A or B parking, but just to “have regard” to the standard.

There should be another section of the code that determines the design of bike parking and associated facilities for staff bike parking and for apartment blocks according to the classes in the Australian Standard and Austroads research report.

This section should specify the different needs for bike parking for these uses:

- Parking must be situated in an area only accessible to residents or staff.
- Parking must be close to the entrance of a garage or building at street level.
- Parking should be fixed to the ground as well as hanging off walls in recognition of the rise in heavier e-bike use and that women and older people are less likely to want to lift bikes.
- Electricity points should be available to charge e-bikes and e-scooters.
- Apartment buildings should provide an area where bikes can be cleaned and maintained close to the bike parking.
- Entrance ramps/driveways to bike parking should be built flush with the road surface.

End-of-trip facilities

Employee bike parking should have the added features of “end-of-trip” facilities.

In addition to bike and scooter parking, end-of-trip facilities should include showers, changerooms, drying areas for wet gear and towels, toilets, lockers and bike tools and air pump.

Good guidance for what should be recommended for end-of-trip facilities can be found in *Bicycle Parking Facilities: Updating the Austroads Guide to Traffic Management*.

It recommends one shower per five bicycle parking spaces and one change room per shower. Additional showers/changerooms are calculated after the first at one for every 10 additional bike spaces. Each bike space should also come with a locker that has space to store a change of clothes and bike panniers.

The planning laws for the City of Vincent in Western Australia are more generous, recommending end-of-trip facilities start at 5 bike parking spaces and then increase for every 5 additional places.

The added benefit of providing end-of-trip facilities is that employees can also use them after exercising at lunch time and they can be utilised by people walking, running and scooting to work as well as riding.

Table C2.1 Parking Space Requirements

There is no overarching Tasmanian guidance which could help determine how many bicycle parking spots should be provided in the planning provisions.

Because we don't have goals laid out for bicycle transport in a Tasmanian Planning Policy or within a government policy such as the Walking and Cycling for Active Transport Strategy, it is difficult to establish adequate bicycle parking numbers.

In the absence of any state-wide guidance, it is reasonable to strive for a goal of at least 10% of all Tasmanians using a bicycle in urban areas, but preferably 20% for town centres like Hobart, Launceston, Devonport and Burnie. The 10% goal is the absolute minimum outlined in the Austroads bicycle parking report:

- **CBD / Principal Activity Centres = 30% bicycle mode split target**
This rate reflects the high propensity for these urban environments to attract bicycle use, as they are major trip attractors and employment generators.
- **Town Centres / Major Activity Centres= 20% bicycle mode split target**
This rate reflects the moderate propensity for these urban environments to attract bicycle use, especially for local and short trips.
- **Other Urban = 10% bicycle mode split target**
This rate is considered to be a reasonable starting point for general urban environments.

We know from the 2021 National Walking and Cycling Participation Survey that 18% of people surveyed had ridden in the past week and 26.9% in the past month so 10% is an achievable target.

But even at the minimum 10% goal, the numbers of visitor parking recommended in the report exceed what currently exists in the state provisions and if the recommended 20% target is adopted for town centres then the state provisions would be seen as seriously lacking.

Separating visitors and employees

The current code only considers visitor parking except for a few selected land uses. There should be separate requirements for visitor and staff bicycle parking as the design and amount of parking differs.

The current code only considers employee parking for the land uses “educational and occasional care”, “manufacturing and processing”, “service industry”, “resource processing”, and “vehicle fuel sales and service” facilities, where staff (and students) get one bike park per five people.

Provision for staff bicycle parking should be implemented for all sectors, and one bike park per five full-time equivalent employees is a good place to start and fits in with the goal of 10–20% of people riding.

Multi-dwelling/apartment buildings also need to be included in the code, as they are currently excluded.

Ideally this should be one bike space per dwelling, especially when the buildings are located in inner city areas where bicycle and scooter transport would be the quickest and easiest mode for short trips.

Other states

Other states in Australia generally require minimum bike parking in apartment buildings, or at least in apartment buildings in central business/activity zones.

Western Australia State Planning Policy 7.3: Residential Design Codes, Volume 2 Apartments, 24 May 2019, provides for:

1 bike space per two apartments for residents and 1 space per 10 apartments for visitors.

The City of Vincent in Western Australia also follows the Austroads three-tier classification for bike parking to differentiate between security levels needed.

And Development WA, the state planning agency that sets standards for major development proposals, is the most generous we could find when it comes to apartments and bike parking. In the guidelines it set for the redevelopment of the Perth Girls School, for example, it recommended 2 parks per apartment as well as end-of-trip facilities for at least 10 bike parks:

Use	Requirement
Bicycle Parking	Bicycle parking is provided at a minimum rate of: <ol style="list-style-type: none"> 2 bicycle spaces per dwelling, may be added to residential storeroom or in a shared bike parking area. 1 bay per 10 dwellings or 200m² NLA for visitors, located adjacent to the main public entrance of a building. 1 bay per 100m² of net leasable area (rounded up) for staff of non-residential uses.
End-of-Trip Facilities	A minimum of 2 lockers is to be provided for every non-residential bicycle bay A minimum of two female and two male showers, located in separate changing rooms, for the first 10 non-residential bicycle bays. Additional showers to be provided at a rate of one male and one female shower for every 20 bicycle bays thereafter. At least one unisex toilet to be provided for every 10 showers or part thereof.

Table 7: Bicycle Parking Requirements and End-of-Trip Facilities

The City of Sydney requires 1 bike space per dwelling under Section 3 of the General Provisions of the Sydney Development Control Plan 2012. The same section also recommends visitor and employee bike parking numbers for different land uses and the three security classes for bike parking as in the Austroads report on bicycle parking.

The Victorian Planning Provisions require bicycle parking for employees or residents to be provided in a bicycle locker or at a rail in a lockable compound, while visitor bicycle parking is to be a rail.

Bicycle parking compounds should be fully enclosed, lockable and if outside provide weather protection, with bike parking supplied at 1 space per 5 dwellings and visitor parking on top of that.

For end-of-trip facilities for employees it recommends one shower for five bike parks and then one shower for each additional 10 parking spaces. One change room or access to a communal change room for each shower.

Heart Foundation's Liveable Streets Code

Bicycle Network is aware of the Heart Foundation's recommendation for a Liveable Streets Code and that in its 2016 submission on the state provisions it provided a draft starting point for such a code.

Our environment has a big impact on our transport choices. Streets that are designed around car use will encourage more car use and the pollution, inactivity, economic and road safety problems that come with that.

Streets designed so that walking and riding are on an equal footing with car use, or in some medium and high density environments prioritised over car use, mean that more people will choose those modes and all the benefits to the individual and society that come with that.

Having a Liveable Streets Code that requires separated cycleways or other suitable infrastructure to provide for safe passage for people of all ages and abilities to ride bicycles would help to deliver the necessary transformation of our streetscapes to encourage rather than discourage active choices like riding and walking.

Such a code could also be the mechanism to implement statewide design requirements for cycling infrastructure.

Bicycle Network supports the consideration of such a code to provide clear direction on how our streets should look to encourage more people to ride and walk.

Recommendations

More secure places to park your bike

- bike parking requirements should apply to multi-dwelling buildings at a minimum one bike space per dwelling.
- bike parking requirements should differentiate between employee parking and visitor parking.
- employee and resident parking should be undercover, have an extra layer of security such as swipe card or padlock access, and not be in a place accessible by other people, i.e. Class A and B of the Australian Standard.
- end-of-trip facilities should include one shower per five bike parking spaces and one change room per shower, with an extra shower and change room for every 10 extra bike parking spaces. Each bike space should have access to a locker.
- visitor parking can be made more secure by being located right next to building entrances or busy paths, well lit and within CCTV coverage.
- the minimum floor space before bike parking is required for high employee number businesses should be reduced to capture small businesses as well as medium and large businesses.
- loopholes that allow developers to finish builds without bike parking and showers being installed need to be closed.

Safer places to ride

- the government should provide direction on the standard of cycling infrastructure to be built on roads according to the number of cars expected and the speed limit. This means some roads with low speeds and fewer cars may have painted bike lanes but on roads with higher speeds and more cars, bikes and scooters will get their own path or on-road separated cycleway.
- paths for people walking and riding should connect through streets that are dead ends to cars.
- The review should consider adopting a Liveable Streets Code as recommended by the Heart Foundation.

Yours sincerely



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