

Brisbane Central Business District Bicycle User Group CBD BUG

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The Right Honourable Cr Graham Quirk Lord Mayor of Brisbane GPO Box 2287 BRISBANE QLD 4001

My dear Lord Mayor

Draft Brisbane City Council Transport Plan for Brisbane - Strategic Directions

The Central Business District Bicycle User Group (CBD BUG) of Brisbane offers the following comments on Council's *Draft Transport Plan for Brisbane - Strategic Directions (Draft Transport Plan)*, released for community feedback in December 2017.

We congratulate you for developing this forward-thinking approach. We applaud that the *Draft Transport Plan* articulates a significant change in direction away from Council's current prioritisation of people who drive cars ahead of people who travel by public transport, bicycle or foot.

Following the plan's finalisation, we look forward to you implementing a wholesale rebalancing of Council's annual transport budget away from road widening to deliver the many public and active transport projects that have languished as little more than concepts for many years, e.g. Kangaroo Point to Edward St Green Bridge.

The results over recent years from Council's annual Service Tracker survey consistently show transport is the single biggest issue on which residents want Council to make improvements.

Within this context we note the absence of any method articulated in the *Draft Transport Plan* to measure progress towards the outcomes sought through this plan. This is a major concern, as without any quantitative measures it is very difficult to hold council accountable for how well ratepayer money has been spent on progress to the vision. Accordingly, we propose the following two measures (which are recorded every five years with the Census) are included as part of a portfolio of performance measures against which the plan will be held accountable:

- Percentage of trips to work made by bicycle (employed persons), and
- Percentage of trips to work made by bicycle (employed females).

Obvious, less quantitative sounding targets could be:

- at least as many women cycling as men, and
- priority of active transport over car parking particularly in the city and CBD section.

The Brisbane CBD BUG strongly supports regular "Sunday Streets" events in the CBD involving wholesale, all-day street closures to motor vehicles. Demand for such street closures is clear from the Story Bridge 75th anniversary event, dining events on the Victoria Bridge and mass bike rides through the CBD with many children participating. The experience from overseas is that businesspeople who oppose the events initially welcome them later. Brisbane cannot be considered a "world-class city" if it cannot hold these events while places like Los Angeles, London, Paris, Brussels, and Bogota regularly can. While BCC has made some very tentative steps in this direction, for example Oxford Street, Bulimba and the Kurilpa Derby, what is needed is an all-CBD event. There is no political downside to having these events.

The plan contains many references to "upgrades", "balance" and "encouragement".

We have found that council planners frequently fail to recognize that "upgrades" are really just road widening activities as they adopt a car-centric viewpoint. We would like to see Council adopt a "positive provision" policy for cycling similar to State government's "Cycling Infrastructure Policy", that TMR funded projects on principal cycle routes will explicitly provide cycling support. We would like to see priority for people riding bikes over motor vehicles at intersections and crossings (e.g. at every crossing on the North Brisbane Bikeway, and at Archer Street, Toowong). Many council "upgrades" should really be termed "widening" as they are downgrades for pedestrians, with crossings at intersections being reduced from four to three, or three to two, and intimidate people riding bikes due to a reduction in safe space. They also fail to reduce congestion because of induced demand. There does seem to be some hope that Council planners are starting to understand induced demand, in that sentences such as "Targeted road upgrades are also necessary to deal with congestion levels" (from the 2008 plan) are absent from this plan.

"Balance" is the default response of Council for rejecting virtually all the many petitions concerning active transport and pedestrian amenity. "Balance" still seems to mean "cars matter most" in Brisbane. The actual imbalance in our transport system can be seen comparing Brisbane to other cities with respect to active transport levels and female participation - hence our request for the measurements above.

"Encouragement" unfortunately often means councils running "confidence courses", updating the "Cycling Brisbane" website and posting on social media. These are cheap and ineffective tools for change. The reality is that people only ride when they feel safe (subjective safety) and this can only be achieved by protected space away from fast moving motor vehicle traffic. There are no cities that achieved huge cycling uptake by running confidence courses; it only comes through "enabling" rather than "encouraging".

This *Draft Transport Plan* outlines a highly desirable vision. However, it is disappointing that there is no actual plan of how to achieve this vision. Previous transport plans have promised a significant shift away from Brisbane's car over-dependence but have failed to deliver. The proportion of people driving to work has continued to increase while the proportion of people travelling by public transport has decreased.

Council's lack of commitment to active transport is clear from such recent and even current actions as removal of pedestrian crossings and insertion of high speed slip lanes in the Kingsford Smith Drive "upgrade" (e.g. at Remora Road), removal of the pedestrian crossing outside Albion station, the Days Road/Kedron Brook Road "upgrade", the Waterworks Road/Stewart Road "upgrade", Boundary Street footpath removal, no significant actions in CBD since 2009 40 km/h speed limit, etc. It is hard for us to conceive how council is going to do a complete turn-around.

This strategic directions document is being released in the context of long-term inaction by Council concerning active transport strategy. A "Brisbane Bicycle Infrastructure Plan" was to be developed from 2012 but nothing was produced in five years; instead in 2018 the idea was rolled into a forthcoming "Active Transport Plan" with an unknown release date. The 2008 plan envisaged that 5% of trips would be made by cycling in 2026. Instead the 2011 and 2016

estimates were 1.6% and 1.8% respectively. Reaching the 2026 goal will require cycling growth never before seen in Brisbane.

The percentage of females cycling to work in Brisbane has been the lowest of any of the eight capital cities in the 2006, 2011 and 2016 censuses (16-22%). Compared to similar cities overseas in 2016, Vancouver achieved 35% and Toronto achieved 38%, which is higher than even the best suburbs in Brisbane (West End, Highgate Hill, Kangaroo Point). This exclusion of females from the option of cycling is a consequence of the highly gendered environment for active transport in Brisbane with a lack of safe infrastructure and inadequate lighting. This concern is absent from the document.

Council's own qualitative self-assessments of active transport progress in the Annual Report (e.g. "On Track" for "Provide a well connected network of safe and continuous bikeway routes") has been absurd and a pointless exercise in self-backslapping. The BUG contends that many potential riders assess key bikeway routes (such as Sylvan Road and the CBD itself) as subjectively unsafe and thus do not ride there.

Thus we have twin concerns: (1) if there is to be no quantitative assessment of progress, council's own qualitative self-assessments will be mere window dressing, or based on money spent with no assessment of cycling growth; (2) if quantitative targets are included they will not be publicly reported - considering that the BUG needed to use an RTI to extract bikeway counts from council recently. Either way, regular and honest assessment of active transport progress is going to require cultural change in Council which has not been seen to date.

The United Nations in its 2016 "Global Outlook on Walking and Cycling" recommended that governments dedicate 20% of transport funding to non-motorised or active transport. This is in line with Council's active transport goal for 2026 (15% walking, 5% cycling). Instead Pojani et al found that Brisbane's budget for active travel in 2015-2018 was between 5 and 8%, lower than Sydney and Melbourne. When the benefit cost ratio for cycling infrastructure is between four and five compared to that of motor vehicle infrastructure often being below one, raising the funding level for active transport to at least 20% is a no-brainer.

The endless plan for urban road widening to "bust congestion" is futile because it leads only to induced demand, more commuters in single occupant motor vehicles and no solution for congestion.

The most commendable part of the document from the BUG perspective were the "Network intent" and "Transport network development" sections in the "Brisbane Inner City" section (page 104). Especially encouraging were the points about "separate through traffic road movements from the inner city road network movements" (e.g. Gehl Architects in 2010 recommended bike lanes on Ann Street and two-way flow) and "promote liveable streets with low traffic speeds and priority for pedestrian, cyclist and public transport movements". We would envisage that "low traffic speeds" here means a 30 km/h speed limit which is world's best practice. However, this sentiment is hard to reconcile with such recent Council actions as the Boundary Street footpath removal in the inner city. The TransApex plan and the ICB widening to eight lanes was and is supposed to remove motor vehicle traffic from the inner city. With these initiatives complete there should be much more space for active transport in this area.

In the "cycling network" section we were encouraged by the points "Provide an integrated, continuous and connected inner city bikeway network", "provide safe on-road routes in the CBD and inner city to complement the off-road network" and "separate pedestrian and cyclist movements on high-volume routes". Again, this last point cannot be reconciled with plans for Council to create a 2.6 metre wide "shared path" on Victoria Bridge.

Page 103 stated that "Cycle connectivity can be improved in the inner city by addressing missing links in the primary on- and off-road bikeway network to provide a safe inner city network." We are concerned that future plans for CBD cycling will be "piecemeal" instead of a grid, e.g. extending the George Street bikeway down to the Botanic Gardens, so were encouraged to see the mention

of "connected". We also envisage that "safe on-road routes" and "safe inner city network" will mean routes with separation from motor vehicle traffic as promoted in the 2016 minimum grid petition to BCC which received over 3,000 signatures. Council's perception of "safe" should be aligned with, for example, TMR's Technical Note 128 "Selection and design of Cycle Tracks".

One of the problems with transport plans world-wide is that they state they will "prioritise active transport" but not what it is prioritised over. Brisbane as a signatory to the "Urban Design Protocol" should already be prioritising pedestrian and cycling movements over motor vehicle movements but this is not seen in practice or in this plan. The closest this plan comes is in the "priority" quote on page 104 but it is not made explicit.

We would like to see an explicit priority mentioned for active transport over on-street car parking in this inner city section. Huge amounts of off-street parking are already available in this area. Council has had nothing to offer except weak excuses when pressed for the development of a CBD minimum cycling grid. Other cities have done far better confronted with the same challenges of loading zones, garbage collection, etc.

The section of most concern to us was on page 95 in the "Brisbane Citywide" section. "However, full separation of networks is not always practical physically or economically." ... "Where practical, separate incompatible transport movements" ... "a *balanced* approach to delivering competing transport functions". As stated above "balanced" is a council codeword used ad nauseam for prioritizing motor vehicles and rejecting active transport improvements. Council has had no problem spending billions on the TransApex network of tunnels but balks at the comparatively minor sums required for such projects as the Kangaroo Point Green Bridge. Thus, we are naturally concerned, given past Council performance, that the "where practical" phrase will be used as "weasel words" or used as an "out" when active transport projects are assessed.

While your document outlines a vision we approve of, we are disappointed that there is no actual plan of how to achieve this vision. Previous transport plans have promised a significant shift away from our current car dependence. They have failed to deliver. The proportion of people driving to work has continued to increase, while the proportion of people travelling by public transport has decreased. We look forward to being part of the ongoing conversation that needs to happen in developing the actual plan and reducing our car dependence.

In addition to these overarching issues, Attachment 1 provides an extensive list points on the details of the *Draft Transport Plan*.

Thank you for the opportunity to comment on the *Draft Transport Plan for Brisbane - Strategic Directions*.

Yours faithfully

Paul French and Dr Richard Bean Co-convenors Brisbane CBD BUG 30 March 2018

CBD BUG detailed comments on draft BCC Transport Plan

- Population density in transport corridors is currently less than it was in the 1960s, as family size has decreased, and the number of single person households has increased. Council could encourage increased density in existing dwellings (rather than knocking them down), by rate reductions for extra residents.
- Heavy vehicles need to be better regulated within the inner 5km. Side underrun protection for pedestrians and cyclists, and vehicles with smaller blind spots are a must. BCC should condition development accordingly, and work with demolition and concrete truck operators to protect people walking and cycling.
- Council needs to improve relationships with the State Government, recognising that it is likely both levels of government will regularly be held by different political parties.
- Council engineers should liaise more with State Government engineers to come to a common understanding of appropriate infrastructure – especially for people walking and cycling.
- Facilities still being signed off by Council engineers are now considered to cause a risk to vulnerable road users e.g. left turn slip lanes. We would like to see slip lanes removed (e.g. as at the Sylvan Road/Bennett Street intersection in Toowong) and not included in future Council plans.
- Council engineers should be encouraged to trial innovative pilot schemes, recognising that a
 "more innovative and visionary approach to transport planning" will require new solutions not
 previously tried in Brisbane. These should be rigorously evaluated with success criteria
 established before the trial.
- To encourage children to walk and cycle, on-road parking should not be permitted within 200 metres of a school.
- Council needs to develop a road safety strategy, like many of its neighbouring cities.
- Council needs to reduce the amount of car parking it provides within the CBD and regulate to reduce the overall amount of parking within the CBD. The plan should include explicit priority of active transport movements over motor vehicle movements and parking in the inner city section.
- Council needs to provide priority for people riding bikes at road crossings.
- Early bird CBD parking should be discouraged.
- There is a secondary market in residential parking permits. Council should auction parking permits in transport corridors, and in the inner 5 km.
- Congestion Reduction Unit tactical measures need to be assessed for safety and comfort of people walking and cycling and should be overridden when they differ from the strategic intent of the transport plan.
- Council should consider alternative funding sources for transport infrastructure. See Auckland's recommendation of a 10c/l levy on fuel within the Auckland region.
- Council needs to work with CBD employers to encourage their staff to walk and cycle more.
- Councillors need to set an example, by walking and cycling, and using public transport more and especially for utility trips. Councillors should keep a travel diary on an accessible website.
- Council should lobby the Federal Government to remove tax and other incentives that encourage people to drive more and use public transport less. GST on public transport fares for instance.
- BCC should eliminate all multiple stage crossings at traffic signals for people walking.
- Pedestrian traffic signals should be programmed with a maximum pedestrian wait time of 30 seconds.
- Suburban footpaths require a strategic focus on walking routes to public transport stops.
- Parking enforcement around schools needs to be boosted.
- Council should start implementing the intent of the plan right now, by changing the focus of current road widening projects e.g.: Juliette St / Ipswich Rd intersection works
- Council should carefully monitor current use of loading zones and taxi ranks with the goal of encouraging quicker turnover.

- Council should lobby for improvements for active transport to and around the Airport and Port of Brisbane (currently banned).
- Council should invest at least 20% of their transport budget into active transport in line with UN goals and to keep pace with Sydney and Melbourne.
- Council should call for more rigourous enforcement of minimum passing distance laws by Queensland Police.
- Lord Mayor's message "Brisbane is a ... safe city". With respect to active transport Brisbane is a highly gendered environment and females cycle at the lowest level of any capital city in Australia. Compared to international cities Brisbane's female cycling levels are dismal. The major reason is that many women do not consider cycling "safe" in Brisbane. The document mentions "all ages, abilities and background" but there is no mention of gender possibly because of Brisbane's consistently poor performance on this metric.
- Lord Mayor's message "... get residents home ... safer with more transport options". This is inconsistent with Council having missed the active transport goals which have been missed consistently since 1995 with no genuine examination of why. Instead they are just lowered or forgotten about, or not mentioned at all.
- Lord Mayor's message "Council will also invest \$100 million in dedicated bikeways and active travel options between 2016 and 2020" – success should be measured by results not by how much Council spends in absolute terms.
- Page 1 "international students to study" the tragic death of Rebekka Meyer in 2014 demonstrated the appalling blind spots surrounding trucks and lack of safety technology in these vehicles. Nothing has been done about these since then. Council can pressure regulators and governments to rectify these shortcomings. Foodora / Ubereats / Deliveroo riders are often international students operating in dangerous traffic in the CBD and Fortitude Valley area. Safe cycling infrastructure in these areas is lacking and the concept of "Brisbane inner city" in the document should include the Valley due to the high population density in the area and the lack of safety (indicated e.g. by the lowest used CityCycle stations in the network being located in the Valley). International students face greater risk if they choose to travel by bike.
- Page 1 "the plan will guide how Brisbane's transport network will grow and adapt". With
 respect to active transport there are already supposed to be very ambitious active transport
 goals (e.g. 11% of trips by bike by 2031 in "Connecting SEQ 2031"). The problem is that
 council currently has no intention of meeting them let alone reporting on them. Instead
 anything that looks good is reported on instead, "spinning", e.g. Cycling Brisbane website
 visitors, year-on-year CityCycle growth rate (even though Brisbane remains the lowest used
 bike sharing scheme of its size in the world), etc.
- Page 2 "road improvement projects", "congestion reduction initiatives". These are codewords for the futile attempt to reduce congestion by widening roads, which is doomed because of induced demand.
- Page 2 "encourage more active travel", "encouraging sustainable travel options",
 "encourages ... students parents and teachers, "encourage residents to make more trips by
 bicycle". These are referring to cheap, ineffective options whereas what is largely needed is
 "enabling" more active travel by providing safe space.
- Page 11 "Active transport". It is notable that there is no active transport map as there is for rail, busway, ferry, air and sea ports, though there is a schematic on page 97. An honest representation of the safe sections would show the CBD missing from the network.
- Page 11 "major Council bikeways". The Bicentennial is very useful for going from the edge
 of the CBD to and from Toowong, but has poor connections on Sylvan Road and there is no
 CBD grid. "Local cycle routes" as an example, the Toowong to Indooroopilly "cycleway"
 going through the Gailey Fiveways roundabout is hopelessly inadequate and consists of

- green paint interspersed with parked cars. It is a prime example of why Council misses their AT targets.
- Page 16 "Average daily traffic volume" presumably this is motor vehicle traffic volume. Wynnum Road has a "widening project", Old Cleveland Road will be critical for a CBD to Carindale cycling route, the North-West roads of Kelvin Grove and Waterworks Roads are a nightmare for even the most confident cyclists to negotiate in peak; while the ICB, Kingsford Smith Drive and Bruce Highway are subject to current widening projects. For active transport, cycling must be prioritised over parking on Vulture Street, Wynnum Road, and Old Cleveland Road to begin with. However Council recently rejected a petition concerning Vulture Street.
- Page 16 "Council's extensive local road network supports the movement of cars, trucks, buses, cyclists and pedestrians throughout the city". Essentially the road network is for the movement of people but the problems occur when Council transport planners and engineers perceive it is for the movement of cars. We end up with "stroads" designed for maximum motor vehicle throughput ("congestion reduction" at all costs, slip lanes) rather than streets for people.
- Page 20 "Council provides pedestrian and cycling infrastructure as well as behaviour change programs to encourage sustainable transport choices." Mikael Colville-Andersen of Copenhagenize: All of the marketing around cycling is really geeky. It doesn't work. We know that nothing works. Every campaign that says "ride a bike, it's healthy, it saves the planet". It doesn't work. But, if you make driving a car difficult then people are forced to make a choice.
- Page 21 It is unclear where these survey results are from. No SEQ Travel survey has been completed since 2009 (partial in 2012). This makes it hard to see how patterns are changing. Perhaps BCC should conduct their own survey.
- Page 22 "the share of trips of public and active transport options increases in the inner city".
 Based on the 2011 bikeways GIS data, 6.8% of the off-road bikeways and 10.3% of the
 bikeways are located in 1.3% of the BCC area (the CityCycle area). Thus people are indeed
 given "options" to ride and feel safe in the inner city area due to the concentration of bikeways
 there.
- Page 23 "Breaking ingrained travel behaviour is achieved through a combination of education and awareness, infrastructure and service improvements ...". Again, the international experience is that cycling can have explosive growth when safe infrastructure is provided – two examples are Seville and London. This hasn't yet happened in Brisbane and residents cannot really be blamed for not riding if they do not feel safe – "education and awareness" will not overcome that barrier.
- Page 27 "Indooroopilly Bikeway" and "Kingsford Smith Drive Bikeway". These are nice
 projects but they do not connect to the surrounding infrastructure. For instance the Kingsford
 Smith Drive bikeway connection to the CBD is via Ann Street or a very long way around the
 peninsula, while the Indooroopilly Bikeway ends at Foxton Street with no connection to the
 many schools east of the Jack Pesch Bridge. This severely limits their usefulness.
- Page 30 "Future population growth will be predominantly catered for through infill development". There seems to be a council belief that active transport growth will happen "automatically" or "by magic". This was seen in the "Connecting SEQ 2031" document as well: "The strong focus on denser development through urban infill will support a shift to more sustainable transport modes." Our assessment is that the denser development is happening but the cycling infrastructure development required to meet the targets is not. There are massive apartment developments on Lutwyche Road, Bowen Bridge Road, Lambert Road and High Street, Toowong with absolutely no corresponding active transport improvement in those areas. Also, with respect to the city plan, mixed land use is essential for active transport success.
- Page 32 "Clean Green Sustainable 2017". "More trips will be made by public and active transport". This is superfluous naturally more trips will be made, because the population is growing. This appeared to be a mere watering down of existing goals as Council realised they would miss their Active Transport targets http://www.cbdbug.org.au/wp-content/uploads/20170606-CBD-BUG-letter-CGS.pdf

- Page 34 "Connecting SEQ 2031" note that the goal was for 11% of trips by cycling in the BCC area in 2031. This target could have been met with concerted action e.g. the original Brisbane Bikeway Plan had a goal of 14%.
- Page 36. "Transport principles to support a balanced approach to transport network decision making". Active transport in Brisbane is hopelessly underfunded and decision making is heavily tilted towards motor vehicle flow.
- Page 37. "People first and safety". Excellent principles street design should be "forgiving" so that mistakes made by people do not result in death or serious injury for the vulnerable road user. The default speed limit in residential areas should be 30 km/h. This is supported by a 2018 Austroads report "Towards Safe System Infrastructure" stating Speed is at the heart of a Safe System and aspirational design speeds include: 30 km/h (car vs pedestrian/cyclist), 50 km/h (car vs car side impact at 90 degrees) and 70 km/h (car vs car head-on).
- Page 39. "A high reliance on private vehicle travel and the related issues of congestion ...". Unfortunately, the transport budget is focussed around futile road widenings demonstrating the 1960s thinking of the Wilbur Smith "Brisbane Transportation Study". In 2010 Jan Gehl warned in a "People Oriented Vision for Brisbane" "The space needed, for instance, for bus and bicycle lanes, is simply filled with cars and it requires considerable political courage to remove capacity for cars in the face of daily road congestion and frustrated commuters and voters." The Gehl report seems to have fallen on deaf ears. Even this current transport Draft Transport Plan does not explicitly envisage what must be done i.e. reallocation of space away from private motor vehicle transport.
- Page 41. "high-quality ... active travel infrastructure". "High-quality" should be defined with
 reference to Technical Note 128 of TMR on "Cycle tracks". High CityCycle growth rates are
 celebrated by Council the reasons behind it are clear i.e. credit card readers on stations,
 Riverwalk reopening, City Reach boardwalk reopening, cheaper pricing, and less police
 enforcement of helmet laws.
- Page 42. "Safe, legible and enjoyable walking and cycling environments connecting to where
 people want to go are key factors in attracting more people to take more trips by active
 transport." Absolutely correct. Note that this must include subjective as well as objective
 safety.
- Page 42. "Age-specific, workplace and suburb-focused programs can take a targeted approach to changing behaviour ..." Again, the international experience is that it's about the infrastructure rather than a lack of information, awareness or education. There seems to be an underlying belief (e.g. Cr Norm Wyndham) that if people just "got confident" they'd start riding. This is a convenient belief for BCC officers and councillors to hold because it relieves them of their responsibility to spend on and design safe infrastructure.
- Page 43. Points 5 to 8. Good but contradicted by recent BCC actions e.g. removing Brisbane's first on-road cycling lanes on Shaw Road (1995) which connected to the sporting facilities there, and not providing cycling priority on the shared path replacement.
- Page 45. "Affordable transport options" which will mean that people aren't forced *into* cars, not that they are "forced out".
- Page 46. "Installation of lighting can significantly improve safety". True, but Council must
 considerably improve their game here as it took heavy community pressure to have lighting
 installed on the shared path near the Grammar schools.
- Page 46. "Iconic streets like James Street and Oxford Street benefit from the close and
 personal links between the transport network and the local urban environment." These are
 interesting examples to choose as these are both car sewers. Trying to find a park as a
 motorist at the Palace Centro cinemas or James Street Markets, or for cafes at Oxford Street
 is very frustrating. The lowest used CityCycle stations are around this area of James Street.
 Despite this, Council still prioritises motor vehicle parking and throughput in these areas.
- Page 50. "Reliable and connected road, public and active transport networks within the CBD and inner city will strength Brisbane's competitive advantage over other Australian centres." At present there are no active transport links within the CBD and so we look forward to the development of a connecting cycling network there.

- Page 51. "efficient and effective business-to-business travel". In the last few years there has been huge growth in food delivery (the "gig economy" - Foodora, UberEats, Deliveroo) in the inner city and the most efficient method for delivery will be by bicycle. The people who perform these deliveries have a right to be safe in their workplace (i.e. the streets).
- Page 52-53. Port of Brisbane and Airport. There are no active transport connections to the
 Port and many problems at the Airport e.g. no safe connections around Viola Place, no bike
 lanes or pedestrian access in the Dryandra Road underpass Council can pressure the
 Airport and Federal Government on these issues. The demand for safe and active transport
 to, from and around these sites is certainly there, and as with the heading, AT is certainly the
 most "efficient" way to get to these sites. So points 24-29 should mention Active Transport
 explicitly.
- Page 55. "Develop an accessible, connected and direct commuter cycling and pedestrian network linked to employment and activity centres". Great.
- Page 59. Visitors are likely to be attracted to Brisbane if they don't have to be stuck in cars hence public and active transport priority is needed.
- Page 61. "Invest in innovative transport solutions to improve the efficiency and effectiveness of Brisbane's transport systems". The best way to improve efficiency is still a shift away from the space required for single occupant vehicles towards public and active transport. Amsterdam would be a horrible mess with cars moving around the same number of people as currently use bikes, but that was their 1960s plan. One breakdown or crash cripples public transport and private cars, whereas rain or floods cripple much of Brisbane's existing active transport network (e.g. Kedron Brook bikeway, Cornwall St underpass).
- Page 61. The document reports numbers but doesn't offer domestic or international comparisons or say "where we want to be" in 2041. Hence quantitative targets would be useful.
- Page 62. Rather than new roads and tunnels, what Brisbane most needs is more efficient operation of existing roads by a shift to more efficient transport modes.
- Page 63. Open data on bikeway usage and spending would be great. However, in the past the BUG has had to use RTIs to get information which should be openly available in the first place.
- Page 71. "Integrate walking and cycling infrastructure to support convenient active travel to and within activity centres including connections to the wider transport networks." Great – mixed land use would be very helpful here e.g. local shops rather than megamalls with associated public transport hubs.
- Page 72. "Continuing to build new road infrastructure or widening existing road corridors is not a long-term, sustainable solution". Correct, and starting to sound like the Gehl report of 2010.
- Page 72. "Transport planning in our major corridors must consider priority across transport functions (pedestrian, cyclist, public transport etc.) to ensure decision reflect long-term, sustainable outcomes". Correct, but Council continually rejects petitions concerning walking or cycling upgrades vis-a-vis motor vehicle "throughput".
- Page 73. Point 65 Green bridges. Fantastic we would like to see Kangaroo Point,
 Bulimba, Riverhills to Bellbowrie, Toowong to West End and many other green bridges.
- Page 74. Sunday Streets. The BUG strongly supports this concept (see letter).
- Page 76. "Separating pedestrians from cycle movements on busy pathways". Correct but
 define busy using state government guidelines (Cycling Aspects of Austroads Guides 2017)
 about path widths. Current council plans contradict this by attempting to ignore these
 guidelines on the Victoria Bridge, which will lead to conflict and exposes council to legal
 liability.
- Page 77. "Investigate, plan and implement local safety improvement programs in residential neighbourhoods, school zones, and high pedestrian activity areas." Great, but contradicted by the Kingsford Smith Drive/Remora Road changes with high speed slip lanes and the removal of pedestrian crossings at other points on Kingsford Smith Drive.

- Page 78. "Safe roads around schools". This should be one area where 30 km/h speed limits should not even be controversial.
- Page 84. Public transport services to Airport and Port. Do not forget active transport.
- Page 90. Bike network links. Great.
- Page 94. "Congestion on our roads has impact on bus services, cycling ..." Hopefully motor vehicle congestion would encourage cycling. We are not in any danger of having cycling traffic jams in Brisbane yet.
- Page 95. "Not always practical" weasel words see letter body.
- Page 95. "Balanced approach to delivering competing transport functions". Again, given council history, these are weasel words which will be used to justify inaction regarding active transport. For example, bike lanes should always take priority over car parking, especially in the inner city. The "part time bike lanes" of Sylvan Road and Annerley Road are often blocked by parked cars in peak hours with some drivers treating the fine as a fee. The Queensland government cycling inquiry of 2013 recognized this priority and recommended banning car parking in all bike lanes during peak hour, but it is up to councils to implement this.
- Page 96. "Designate and provide a primary on- and off-road network for commuter and experienced cyclists that provides safe and direct connections to major employment and activity centres". Fine, but everyone deserves safe and direct routes.
- Page 96. "Overcome significant barriers to cycling movements ...". Green bridges are welcome.
- Page 98. "Continued reliance on private car-based travel for all transport trips is not a
 sustainable or affordable outcome for the city." However, this is what council's transport
 funding encourages. They even often discounted parking in the CBD at Christmas time to
 encourage more car trips.
- Page 103-104. Inner city network the best part of the plan see letter body.
- Page 109. "Slow-speed traffic environments". We hope this means 30 km/h.
- Page 110. "Traffic management in suburban areas requires balancing the need for safe streets for local residents with the need for through traffic movements ... the separation of these functions is one way to manage traffic in local areas. Where separation is not feasible..." This sounds terrible, especially with respect to the safety of children playing. Safety must always come first, and BCC should adopt a "Vision Zero" strategy. Unfortunately, the former BCC Chairman of Public and Active Transport, for example, stated the Sylvan Road part-time bike lanes were "a bid to balance the competing demands of cyclist safety with parking across the city" and that "removing car parks would be detrimental to businesses". The reality is that bike lanes are good for business (see Heart Foundation study) but the message has not got through to some BCC officers and councillors. With respect to BCC petitions, the BUG has found that parking always wins and there is no "balance" at all e.g. CBD Grid, Kedron Brook Road petition, etc. The last time significant parking was permanently removed for a cycling project was for CityCycle (2010-2012).
- Page 111. "Local Area Traffic Management plans ... typically included measures and devices to ... discourage rat-running". This is not always the case for instance Wilgarning Street in Stafford is a major rat-run but "traffic throughput" has overridden the case for neighbourhood amenity in this area.
- Page 113. "Provide safe legible and comfortable cycling routes to connect residents to services, shopping, schools, employment and public transport". Great – the measure of "safety" will be if it actually gets used and the percentage of female cyclists as a percentage of the total.