

## **ATTACHMENT B**

**SUMMARY OF FEEDBACK ON THE DRAFT  
MOTORCYCLE AND SCOOTER STRATEGY**

## Summary of feedback on the Draft Motorcycle and Scooter Strategy and Action Plan

Approximately 85 individual and 7 organisational submissions were received during the public exhibition period of the Motorcycle Strategy.

Given the volume of responses, only the organisational submissions are summarised separately. However, the issues raised in all submissions are grouped below by theme, and the City has endeavoured to respond to all suggestions.

### 1. Disability Council of NSW

Submission themes	Comment
<ul style="list-style-type: none"> <li>Support for maintaining prohibition on footpath parking as proposed in the Strategy; concern at continued obstruction of footpaths by parked motorcycles, and need for improved enforcement.</li> </ul>	<p>Abolition of the ticket parking requirement will reduce the incentive to park on footpaths for couriers and short-stay parking. Illegal commuter parking on footpaths will be addressed with a mix of stronger enforcement and limited expansion of on-street parking near problem areas. Initiatives to promote off-street commuter parking are contained in Action Item 4.11.</p>
<ul style="list-style-type: none"> <li>Anchor points &amp; recharge stations may pose hazard to pedestrians with disabilities.</li> </ul>	<p>The City will consult the Disability Council on the design of anchor points and recharge stations. Any trials will be developed with a view to avoiding any pedestrian hazards or access impediments.</p>
<ul style="list-style-type: none"> <li>Hybrid and electric vehicles may pose threat to pedestrians if they are inaudible.</li> </ul>	<p>Quieter vehicles will improve the urban environment, and will mean that over time engine noise will be less reliable as a guide to the presence of motor vehicles, resulting in changing pedestrian behaviour. This is also relevant to the increase in cycling.</p>

## 2. Vision Australia

Submission themes	Comment
<ul style="list-style-type: none"> <li>Support for maintaining prohibition on footpath parking.</li> </ul>	<p>Agreed. The Strategy does not propose to permit footpath parking by motorcycles or scooters, and such parking is not legal under the Australian Road Rules. Abolition of the ticket parking requirement will reduce the incentive to park on footpaths for couriers and short-stay parking. Illegal commuter parking on footpaths will be addressed with a mix of stronger enforcement and limited expansion of on-street parking near problem areas. Initiatives to promote off-street commuter parking are contained in Action Item 4.11.</p>
<ul style="list-style-type: none"> <li>Request for involvement in design of street furniture, such as locking rails.</li> </ul>	<p>The City will consult Vision Australia on the design of anchor points and recharge stations. Any trials will be developed with a view to avoiding any pedestrian hazards or access impediments.</p>

## 3. Federal Chamber of Automotive Industries

Submission themes	Comment
<ul style="list-style-type: none"> <li>General support for strategy and proposed changes to ticket parking.</li> </ul>	<p>Noted. This is proposed in the Strategy.</p>
<ul style="list-style-type: none"> <li>Support for safety education.</li> </ul>	<p>Noted. The provision of road safety programs is proposed in the Strategy.</p>
<ul style="list-style-type: none"> <li>Objection to advocacy of national emissions standards for motorcycles.</li> </ul>	<p>Not agreed. Emission standards are in the interests of residents and visitors, and are widespread and well-accepted in other national jurisdictions. The Strategy retains a strong focus on advocating for improved environmental standards for motorcycles and their inclusion in the Green Vehicle Guide to provide greater awareness to purchasers.</p>

## 4. Honda Australia

Submission themes	Comment
<ul style="list-style-type: none"> <li>Strongly welcomed the strategy, noting these sort of changes are sorely needed in other urban centres, and advising they will be directing key stakeholders to have a look at the City's Strategy as an example of how to do things 'the right way'.</li> </ul>	<p>Noted. The City has also circulated the draft Strategy to various State Government agencies, the City of Melbourne and national motorcycle bodies. The final Strategy will also be circulated.</p>
<ul style="list-style-type: none"> <li>Support for reform to ticket parking as proposed in the Strategy.</li> </ul>	<p>Noted. This is included in the Strategy, and will facilitate parking for riders and help discourage use of footpaths, plazas and the like.</p>
<ul style="list-style-type: none"> <li>Support for rider training as proposed in the Strategy.</li> </ul>	<p>Noted. This is included in the Strategy, and recognised as an important safety initiative.</p>
<ul style="list-style-type: none"> <li>Supported advocacy on encouraging prospective riders to choose modern Euro-3 compliant motorcycles, and suggested greater clarification on what form this might take.</li> </ul>	<p>Noted. This is included in the Strategy and important to improve the environmental performance of motorcycles and scooters. The Strategy identifies the need for emission standards and inclusion of motorcycles in the Green Vehicle Guide. Details are not provided in relation to the specific form of advocacy to allow City to take steps that are most appropriate. This is consistent with all action items in the Strategy.</p>

## 5. Sydney Harbour Foreshore Authority

Submission themes	Comment
<ul style="list-style-type: none"> <li>Need for new on-street long-stay parking to address illegal footpath parking in The Rocks.</li> </ul>	<p>The City will, as a priority action, work with SHFA to establish a new dedicated motorcycle parking area in or near The Rocks.</p>

## 6. NRMA

Submission themes	Comment
<ul style="list-style-type: none"> <li>• Reallocation of short-stay car parking to commuter motorcycle parking not appropriate in CBD.</li> </ul>	<p>The City recognises that on-street short stay car parking in the CBD serves both commercial and private users, and that parking turnover is desirable. The Strategy gives priority to providing dedicated motorcycle spaces in locations which are not suited to cars or which are particularly suited to motorcycles.</p>
<ul style="list-style-type: none"> <li>• Note that motorcycles are not suitable for all motorists.</li> </ul>	<p>Noted. The Strategy recognises that motorcycles are not suitable for all persons. A key feature of the Strategy is to remove inequities and barriers that riders face relative to drivers.</p>
<ul style="list-style-type: none"> <li>• Suggest Council officers gain accreditation to enforce noise and pollution controls.</li> </ul>	<p>All Council Ordinance Rangers are Authorised Officers under the provisions of the Protection of the Environment Operations Act. Rangers will report noisy or polluting vehicles, including motorcycles and cars.</p>
<ul style="list-style-type: none"> <li>• Concern at growth in 2-stroke engines; support for incentives to adopt low-emissions motorcycles and scooters.</li> </ul>	<p>Agreed. The Strategy includes measures to increase the uptake of low-emission vehicles and electric scooters, including trialling of recharging points. It also includes advocacy for the introduction of emission standards for motorcycles and their inclusion in the Green Vehicle Guide.</p>
<ul style="list-style-type: none"> <li>• Support footpath motorcycle parking on low-pedestrian volume streets.</li> </ul>	<p>Not supported. Motorcycles parked on footpaths pose an obstruction hazard to pedestrians with disabilities, and are contrary to the City's objective of reducing footpath clutter. Footpath parking is also contrary to the Australian Road Rules, as adopted in NSW. The City's ticket parking reforms will ensure motorcyclists have the same access to on-street parking as is currently enjoyed by car drivers.</p>

## 7. VicRoads

VicRoads, in association with the Victorian Motorcycle Advisory Council (VMAC), is preparing a strategy document for Powered Two Wheeler (PTW) vehicles which will encompass both transport and road safety initiatives. As the City of Sydney is under the jurisdiction of the NSW Roads and Traffic Authority, VicRoads did not provide a formal submission. VicRoads did however review the Strategy and provided various informal comments to assist the City. An important issue raised by VicRoads is noted below.

Submission themes	Comment
<ul style="list-style-type: none"> <li>The Strategy notes that multiple vehicles cannot be parked in the one parking bay as it contravenes an Australian Road Rule. If the City of Sydney wish to pursue an amendment to this road rule to encourage the use of smaller, more fuel efficient vehicles, and has the support of the Roads and Traffic Authority (NSW), VicRoads would consider supporting this amendment at the Australian Road Rules Maintenance Group to assist in managing congestion in urban areas.</li> </ul>	<p>Noted. The Strategy has been updated to include advocacy for a change to the Australian Road Rules to allow multiple vehicles (motorcycles/scooters) to park in a single bay. While this is of limited utility in the City of Sydney, which avoids this issue by limiting the use of marked bays, a change of this nature would assist riders and users of smaller, more efficient vehicles. Moreover, it would avoid inequities arising from the attempted enforcement of this Road Rule, as it is generally not possible to identify which vehicle parked first in a bay, meaning that any infringements issues are likely to be randomly or unfairly applied.</p>

**8. INDIVIDUAL SUBMISSIONS**

Individual submissions are not listed here, although they are recorded on the City’s TRIM Record Management System. Major issues raised by respondents are addressed here thematically.

**A. ON-STREET and OFF-STREET PARKING**

Access to sufficient parking for commuter motorcyclists was the dominant theme of comments on the Draft Strategy, and more than half of all respondents sought an increase in commuter parking for motorcyclists. Typical comments included:

“I have to arrive at my office before 6.45am in order to find a parking spot due to limited spaces around that part of the city”

“I think I speak on behalf of other riders that our preference would be for more parking in high demand CBD areas through the creative use of un-used space.”

It is about time the city recognised the lack of motorcycle parking although I’m grateful more parking has been created in Kent Street” 1

“The draft strategy ignores the biggest resource the city has for motorcycle parking - the existing and increasing capacity of commercial parking stations.”

“Would we be able to provide a range of parking options by negotiation with the private parking providers such as Wilsons or similar?”

Comment	Response
Inadequate commuter parking in CBD	On-street parking is free for motorcycles, and available spaces are taken early. Supply of parking has been expanded significantly over the last two years to accommodate the needs of riders, and further on-street spaces are proposed. However, high demand for kerbside space – including for bus lanes, cycle lanes, loading zones and short-stay parking – limits the potential for significant growth in on-street spaces in the CBD. Further supply will need to be met by existing off-street parking. The Strategy has been updated to reflect this, and includes a new action item to improve motorcycle parking availability in commercial car parks by surveying rates and parking supply, and making this information available to riders through the City’s website.

Comment	Response
<p>Need more commuter parking in north and north-east corner of CBD.</p>	<p>The City will investigate potential new motorcycle parking locations in the north east part of the CBD. There may also be potential for a larger motorcycle parking bay at the northern end of Hickson Rd. It should be noted however that there are limited opportunities for expanding the provision of motorcycle parking in the northern CBD.</p>
<p>a) Shortage of casual motorcycle parking spaces with one or two hour limit and b) objection to 1-2 hour spaces</p>	<p>Timed motorcycle parking has been installed to ensure casual parking is available to motorcyclists who may not be able to use surrounding ticket parking. However, removal of the requirement for motorcyclists to display a ticket in short stay parking areas will free up a large amount of casual parking. Timed zones will then be assessed, and restrictions are likely to be removed in most cases unless local use generates strong demand for casual motorcycle parking (eg some gyms &amp; motorcycle dealerships).</p>
<p>Separate motorcycles (single stand) from scooters (double stand) to maximise space and prevent damage.</p>	<p>Not supported. Given the changing daily mix of motorcycles and scooters, this would be very difficult to implement and enforce, it is also likely to waste parking space.</p>
<p>Signpost 'No Parking before 9am' to ensure some parking available for people who start later.</p>	<p>This option may be suited to certain locations and will be explored.</p>
<p>Measures should be taken to improve motorcycle access to parking stations.</p>	<p>Agreed. The Strategy has been amended to incorporate an additional action item to develop initiatives to improve motorcycle parking availability in commercial car parks, by surveying rates and parking supply, and making this information available to riders through the City's website.</p>
<p>Support for a law change regarding the parking of more than one vehicle in a car space.</p>	<p>Agreed. The City will advocate for this change. See response to comments from VicRoads, above.</p>

## B. Environment and Transport

"My concern with the draft motorcycle and scooter strategy is that it rests on the assumption that the would-be riders are people who would otherwise drive cars into the city. Has this been verified? What are the statistics? I suspect that the strategy will actually attract people who would otherwise use public transport, and this is not desirable."

Comment	Response
Potential for noise pollution	The Strategy recognises concerns about excessive noise, particularly from illegally modified vehicles, and the fact that the behaviour of a minority may tarnish the majority. The issue does however need to be addressed, and to further emphasise the City's response, the Strategy has been amended to include an additional action item to work with the Department of Environment and Climate Change to take action against noisy vehicles.
Encouragement of motorcycle use will cause undesirable mode shift away from sustainable transport modes.	The strategy does not encourage riders to switch from public transport, walking or cycling, but rather seeks to address inequities that riders face relative to car drivers. The Strategy also includes measures to increase the uptake of more sustainable, low-emission vehicles and electric scooters.
Motorcycles produce fewer emissions than public transport, especially when buses and trains have few passengers.	While a lightly loaded bus or train may have high emissions per passenger/km, choosing to use an existing scheduled service produces fewer additional emissions than choosing to make the same trip by motorcycle.
Need more detail on the emissions strategy and how it would work.	The Strategy advocates for adoption of national emissions standards, which would work in the same way as existing national emissions standards for passenger vehicles. The standard would be incorporated into the Australian Design Rules, and administered by the Federal Government.

## C. FOOTPATH PARKING and 'DEAD SPACES'

Approximately 12 respondents specifically sought amendment to the draft Strategy to permit footpath parking. Nine further respondents suggested that limited footpath parking in defined 'dead spaces' be considered as an alternative to blanket permission or prohibition. Typical comments included:

"The city has numerous little spaces tucked away where motorcycles can usefully park... The default position really should be that bikes can be parked in such places unless there is good reason not to."

"Now I understand why footpath parking is not feasible since the majority of the city streets are too narrow, but to write off the idea completely seems a bit strange to me. I know of many areas which are not frequented by pedestrians where the pavement area is vast, and it could easily accommodate motorcycle parking areas at no inconvenience to anyone."

A number of submissions objected strongly to allowing motorcycle parking on footpaths, and supported the position in the Draft Strategy. Comments included:

"The footpaths are indeed too narrow and parking on them creates fumes and noise as well as blocking pedestrian traffic. Any parking on footpaths is detrimental to residents quality of life especially for those residents living on the ground floor of apartment blocks which are directly on the street."

"...Obstacles such as shop merchandise, outdoor dining, A-Frame signs etc continue to present unnecessary hazards, particularly when placed directly outside a building. If parked scooters are introduced into this mix, this would obviously make navigation of the footpath even more of a nightmare for a person who is blind or has low vision."

Comment	Response
Footpath parking should be trialled rather than rejected up-front.	Not supported. Footpath parking is not consistent with the City's urban amenity goals, or the maintenance of access for pedestrians with a disability. The Strategy proposes alternative measures to facilitate parking for riders.
Footpath parking should be permitted, unless specifically excluded.	While this approach is taken in central Melbourne, it is not consistent with the City's urban amenity or disabled access objectives.

Comment	Response
<p>Footpath parking represents a hazard to disabled and vision-impaired pedestrians</p>	<p>Agreed. The Strategy does not propose to allow footpath parking. Abolition of the ticket parking requirement will reduce the incentive to park on footpaths for couriers and short-stay parking. Illegal commuter parking on footpaths will be addressed with a mix of stronger enforcement and limited expansion of on-street parking near problem areas. Initiatives to promote off-street commuter parking are contained in Action Item 4.11.</p>
<p>Footpath parking should be permitted on designated wide footpaths.</p>	<p>Not supported. While some footpaths may be wide, they may carry larger volumes of pedestrian traffic, particularly in the CBD, where pedestrian congestion on footpaths can be a significant issue. There may however be a small number of otherwise dead spaces in the public domain, which are not on pedestrian desire lines or footpaths as such, which may be suitable for motorcycle and scooter parking, but these would need to be individually assessed and specifically designated as such. There are two such locations in the CBD, at the western end of Druitt Street and a small segment under the Cahill expressway.</p>
<p>Melbourne comparison not valid, as many Sydney footpaths are also wide, and many Melbourne footpaths are narrow but still permit footpath parking.</p>	<p>While footpath parking on narrow streets may be permitted in Melbourne, it nonetheless can reduce space available to pedestrians, detract from pedestrian amenity, and create navigation hazards for disabled and visually impaired individuals.</p>
<p>Clutter argument in Draft Strategy is misleading as Council is not reducing street furniture or obstructions.</p>	<p>This is not correct. The City is progressively taking action to reduce footpath clutter. The City's parking sign rationalisation project was adopted by Council in 2006, and more than 1300 redundant poles and 1600 signs have been removed to date. The City is also working with the RTA to commission a joint study to investigate the feasibility of using roadway line markings to replace parking signs.</p>
<p>Use 'dead spaces' for motorcycle parking or small spaces not suitable for cars.</p>	<p>Supported. The Strategy recommends identifying small spaces that are not suitable for cars and providing motorcycle and scooter parking where appropriate. An example of such a space is provided under the Cahill Expressway at Circular Quay.</p>

# ATTACHMENT B

<b>Comment</b>	<b>Response</b>
Motorcycles obstruct Clarence St and Kent St footpaths, under the Western Distributor.	Obstructive and illegal footpath parking at this location has been a frequent complaint of residents and pedestrians. At the same time, the City has received multiple requests from riders for permission to park at these locations. The Strategy does not support motorcycle parking on the footpath or the creation of footpath obstructions from motorcycle parking. The City will investigate whether a portion of this area on Clarence St, away from the footpath, can be safely designated for motorcycle parking. However, motorcycles on Kent St will be expected to relocate to a number of new on-street parking zones to be established in the northern part of central Sydney.

## D. TOLLS

Most respondents supported action 1.10 ‘Advocate for fairer and more convenient toll-payment options for motorcycles’. While a majority of submissions concerning tolls requested that the City advocate for no tolls, a large minority supported advocating for concessional tolls provided that tolling technology was safe and convenient. A number of responses expressed concern at the safety of arm-mounted tags.

“It remains iniquitous that motorcycles in New South Wales pay the same toll as cars though they occupy less road space and do far less damage to the road surface.”

“Road tolls are mostly working now for motorcyclists, with the RTA providing toll tags that work well from inside pockets or bags, and/or registering a motorcycle to be photographed and a toll deducted automatically from an account without additional charge and no tag or stopping required. The only issue really is that the cost of the toll is the same for a motorcycle as for a small van”

“This just doesn’t work, we can’t hear if the tag works or not and generally regardless of where the tag is it might only work 3 times out of 10.”

Feedback	Comment
No tolls should be levied on riders	While the City will advocate for fair and convenient tolling arrangements, it is reasonable that motorcyclists make some contribution for the use of toll-funded infrastructure such as motorways.
Tolls should be based on vehicle weight and damage to road.	The Strategy proposes to advocate for fair tolls, which may be partly based on vehicle weight. However, many costs incurred in infrastructure financing, construction and operation are not related to vehicle weight.
Armband-mounted tags are inconvenient and potentially dangerous.	The City will advocate for more convenient tolling arrangements for motorcyclists that do not require shoulder mounted tags, etc.

## E. SAFETY

Rider feedback strongly supported additional safety measures, particularly education of car drivers. Many argued that Sydney's infrastructure and driver attitudes are hostile to motorcyclists.

"Car drivers who have never bicycled or ridden motorbikes do not understand the impact of a tonne of steel and plastic against a fragile body, and a constant level of education is necessary."

"Car drivers who still do not see us! This is despite the fact that I'm a 95kg riding a big white scooter while wearing bright riding gear. Just last evening I was almost hit by a car driven by a young girl who was obviously too busy text messaging on her phone!!!"

"I have to question if you actually talked to people who ride motorbikes everyday and know the reality. This city is so motorbike unfriendly and dangerous it is amazing any of us survive. Everyday I encounter environments that leave me to question the sanity of riding."

Feedback	Comment
Safety education is needed for drivers	Agreed. The Motorcycle and Scooter Strategy includes road education and awareness campaigns directed at drivers. It also includes education for riders to anticipate potentially dangerous situations, regardless of whether the motorist or rider is at fault.
Need for better education of new riders.	Existing RTA licensing and rider training requirements are rigorous and comprehensive. City of Sydney road safety campaigns undertaken as part of the Road Safety Program will consider the circumstances of new riders and encourage the uptake of such courses.
Strategy does not address road surfaces and safety problems in sufficient detail, particularly hazards from street cleaning, street upgrades and maintenance works.	The Strategy recognises the importance of well maintained streetscapes and carriageways, and the City maintains a comparatively high level of maintenance. Any specific areas with deficiencies reported by riders, motorists or pedestrians will be promptly addressed by the City. Information on reporting road safety hazards will be added to the Motorcycle page on the City's website.
Image on page four of Strategy does not show appropriate protective clothing.	Agreed. This image has been replaced.