

Bicycle Queensland response to Brisbane City Council draft e-mobility strategy

February 2021.

Bicycle Queensland offers these comments **in support** of Brisbane City Council's draft e-mobility strategy. Despite some concerns expressed below, Bicycle Queensland welcomes the strategy's focus on giving people options to move away from car dependency, and towards a future in which active transport and e-mobility work well together.

Policy and legislative framework

- The policy and legislative framework in Queensland around small-wheel devices powered by electric motor is under-developed. The State Government refers to them as personal mobility devices or "[rideables](#)", but this draft strategy uses a different terminology, and does not mention rideables at all. We point this out simply as an example of how undefined this discussion is.
- The BCC draft strategy has an incomplete definition of an e-bike in the glossary, one which misses out the majority of e-bikes sold in Australia. Those are e-bikes (often referred to as pedelecs) which meet the European EN15194 standard. They have electric motors producing 250W of assistance, and are also restricted to 25kmh.
- Rideables are a relatively recent entrant into the space that was previously reserved for active transport users. The process of clarifying the role of e-bikes in Australia took several years, at least partly because policy makers and user groups alike wanted to be assured that e-bikes were indeed active transport. Rideables are innovative and novel, but they do not fit into any existing definitions of active transport.
- There are well-understood public health benefits which come from promoting active transport to a much larger role in the transport systems. A third of adult Australians are obese, and as a population we have an urgent need to be more active in our daily lives. There is no research or evidence that we are aware of that ascribes any public health benefit to rideables.
- Which leads to our question: should rideables be treated the same as active transport modes when it comes to priorities for space allocation? It is obviously convenient for transport authorities to lump rideables in with walking and cycling, but it is less clear that these new modes will bring long-term benefits to the health of the population (especially if they lead to fewer trips by walking or cycling).
- Bicycle Queensland commends for reference Transport for NSW's excellent new document [Road User Space Allocation Policy](#).

Safety

- Bicycle Queensland has concerns about the safety of powered scooters. Those concerns are with the broad design parameters of these devices, not the specific models of scooters used by hire operators, or those available for private purchase. Our concern is that a small-wheeled device is inherently less stable and more “twitchy” than larger wheel machines such as bicycles and e-bikes. The design of the bicycle has many decades of iteration applied to the problem of making a machine which uses gyroscopic forces for stable operation. Small wheels are easily deflected or stopped by bumps, gutter lips, and potholes, which larger wheels roll over. The current bikeway and shared path networks have these obstacles in abundance.
- Because scooters and other small-wheeled rideables are inherently less stable than machines with larger wheels, the operators of these machines are at a disadvantage when mixing with bicycles on shared paths and bikeways. For instance, it is difficult for e-scooter riders to use hand signals for left or right turns, or to indicate that they are stopping. Taking your hands off the handlebars when operating an e-scooter is to invite a loss of control of the vehicle. And because there is very little policy or legislative support from the State, there is no requirement for devices to have turn indicator lights or brake lights.
- Our concerns about inherent safety apply in different ways to motorised skateboards and one-wheel devices. Skateboards are more stable than scooters but have less capability to deal with surface variability. One-wheelers add the potential issue of becoming an uncontrolled projectile if the operator jumps off in an emergency.
- Speed. Although rideables are limited by regulation to 25km/h maximum, since their introduction in 2018 Bicycle Queensland’s office has received regular feedback from members that privately owned e-scooters are operating at speeds of up to 45 km/h on bikeways and shared paths. BQ members have reported dozens of near-misses and some collisions, almost all of which have been ascribed to e-scooters travelling too fast for the bikeway or shared path conditions. It is unclear to us whether e-scooters are being modified by users, or whether the scooters being sold are capable of these speeds “out of the box”, but either way our members and other more vulnerable path users feel unsafe mixing with scooters at speeds well above 25 km/h.
- For the reasons mentioned above, Bicycle Queensland’s view is that rideables cannot be regarded “as safe as cycling” (p11 of draft strategy). It is certainly possible for an experienced person to operate these devices safely, but we don’t have enough data yet to give rideables a tick of approval on safety grounds. More research is required – the studies quoted in the draft strategy are from a very small sample, and more education of the users and general public would also be beneficial.
- **We recommend that the State Government review its personal mobility devices policy to consider the primary safety concerns around rideables, and to mandate turn indicators and brake lights on e-scooters.**

Accessibility

- We believe it is important when we consider accessibility that the most vulnerable users are considered as the highest priority to have safe access to their destinations.
- In the Brisbane context, there is no doubt that walkers and bike riders fall into the vulnerable category. Walkers and wheelchair users particularly are likely to experience a decrease in amenity on shared paths if rideables and e-bikes are not perceived as being operated safely and courteously. Bicycle Queensland has received a lot of feedback over the years from people who believe that bicycle riders have behaved discourteously to other users, and in response we have launched a program called the Commuter Harmony Alliance, to promote safe and responsible behaviour by all users.
- Our feedback is that it would be helpful if the 'Accessibility' section of this document specifically named walkers and wheelchair users as modes that BCC will give priority in ensuring that safe access continues for those groups.

Mobility and Agility

- Bicycle Queensland commends these sections of the strategy as being focussed on moving people from place to place in sustainable and innovative ways which reduce the car dependence of our society.
- The average Brisbane household spends more than \$20,000 per annum on transport (source: [AAA Transport Affordability Index](#)). Walking and cycling for transport are the best ways for Brisbane household to reduce their transport costs, but rideables are also an affordable alternative to registered motor vehicles. Bicycle Queensland would be happy to work with Brisbane City Council or other sponsors on an annual Alternative Transport Affordability Index that produced a definitive guide to the savings available to households.
- We encourage Brisbane City Council to state clearly its priorities for the use of the road reserve. Storing private property within the road reserve must be a lower priority than providing infrastructure for active transport modes and rideables. Once again, we want to commend to BCC the [road user space allocation document produced by Transport for NSW](#).
- For this mobility revolution to be realised, and for people to change from car travel to active travel or rideables, the infrastructure available in the city of Brisbane needs to be safe, attractive and convenient. We applaud BCC's commitment to building better bikeways and shared paths over the last decade through successive terms of the administration. However, Brisbane's active transport networks are as yet incomplete and highly variable in quality and legibility.
- Increasing the role of rideables in this mix places an even greater imperative on local governments and the State Government to ensure that people who want to use these more sustainable modes can do so without facing daily risks due to incomplete or below-standard infrastructure.
- **We strongly recommend that BCC revise its current planning for walking and cycling infrastructure in the light of this e-mobility strategy, with a view to increasing the investment level, reviewing path widths on routes likely to carry significant numbers of rideables and e-bikes, and shortening the timeframes for delivering the network.**

Conclusion

1. We support the directions stated for Safety, and add 'speeds above 25kmh' as an enforcement issue for Queensland Police (p14).
2. We support the directions stated for Accessibility (p15), but with the caveat that rideable devices might create situations where other path users' accessibility is impeded, especially walkers and wheelchair users.
3. We support the directions stated for Mobility (p17).
4. We support the directions stated for Agility (p19), and add that the emergence of rideables highlights the imperative for Government of all levels to work together towards a resilient, legible and attractive network for active transport and rideables.

--Rebecca Randazzo CEO
& Andrew Demack, Director of Advocacy

Bicycle Queensland is the leading voice for community cycling in Queensland. With over 16,000 members statewide and more than 32,000 supporters on our database, every day we're helping Queenslanders to cycle safely. See <https://bq.org.au/about-bq/> for more information.