

The Hon Mark Bailey MP  
Minister for Transport and Main Roads,  
Queensland.

Via email.

26 February 2021

Dear Minister

Bicycle Queensland recently drafted our response to Brisbane City Council's e-mobility strategy. In the process of coalescing our members' feedback on e-scooters and our thoughts on the impact of e-scooters and other rideables on the current and future active transport network, it became clear to us that many of the issues we wanted to highlight around rideables are under the control of the State Government through the Department for Transport and Main Roads.

#### **Policy and legislative framework**

- The policy and legislative framework in Queensland around small-wheel devices powered by electric motor is under-developed. 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 and infrastructure

- 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 wheeled machines such as bicycles and e-bikes. The design of the bicycle has many decades of iteration applied to the problem of designing 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 e-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.
- **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.**
- We encourage both Brisbane City Council and the State Government to state clearly the 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 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 for these modes across Queensland needs to be safe, attractive and convenient.

- Increasing the role of rideables in this mix places an even greater imperative on the partnerships between 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 State Government revise its current planning for walking and cycling infrastructure in the light of Brisbane City Council's 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.**

We recognise the State Government's strong track record in the most recent two terms in funding the Principal Cycle Network through partnerships with local government, and through direct investment by the State. We ask you to continue to lead the way on providing for the changes in how Queenslanders are deciding to get around, as represented by this draft strategy from Brisbane City.

Minister, we also ask for your assistance in lobbying the Federal Government to begin funding active transport initiatives at a level commensurate with its funding of roads.

Yours towards a safer, more sustainable Queensland



Rebecca Randazzo  
CEO, Bicycle Queensland