

**Submission  
No 164**

## **INQUIRY INTO USE OF E-SCOOTERS, E-BIKES AND RELATED MOBILITY OPTIONS**

**Organisation:** Randwick City Council

**Date Received:** 18 August 2024

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The Hon. Cate Faehrmann  
Chair, Portfolio Committee No. 6  
Parliament House  
Macquarie Street  
Sydney NSW 2000

16 August 2024

**Ref No:** D05411570

Dear Ms. Faehrmann

**Re: Inquiry into the use of e-scooters, e-bikes and related mobility options**

Randwick City Council (Council) welcomes the opportunity to provide a local council's perspective in response to the inquiry into the use of e-scooters, e-bikes, and related mobility options (e-mobility) in New South Wales. We would like to highlight the current status of e-mobility in the Randwick local government area (Randwick), several key safety issues raised by the community, how Randwick Council is supporting the e-mobility, and suggested measures to enhance the safety and integration of e-mobility.

**Current Status of E-mobility in Randwick LGA**

Council is committed to establishing fair use of public space that maximises transportation options and the health and wellbeing of residents and visitors. The general trend in micromobility usage, which include pedal powered devices as well as e-mobility, has been increasing in the Randwick LGA.

In order to support active transport options, Council is active in the following spaces:

- Actively listening to the community regarding the concerns raised related to walking and cycling and mitigating these concerns wherever possible,
- Delivering safe infrastructure by improving our walking and cycling safety by expanding our networks,
- Working with bike share operators, such as Lime, Beam, HelloRide, to support the dockless e-bikes in the local government area.

The use of e-mobility options has been recognised in Randwick. Throughout the Randwick LGA there are local topographical conditions resulting in many areas with significant gradients; often over lengthy distances. Such conditions will likely deter many people from choosing a pedal bicycle as a transport. E-mobility options will likely assist riders overcome such topographical barriers.

The use of bicycles in Randwick has generally been increasing in recent years and e-mobility usage has been recorded as around 2% of the micromobility surveys 2023 and 2024. E-mobility was defined as e-scooters and other forms of micromobility. These surveys also indicated that,

of the women identified as using micromobility, 46% were using an e-bike or e-scooter in 2024 - an increase from only 20% counted in 2023.

To support safer bicycle riding Council has been focused on delivering infrastructure in Randwick. In 2023 Council completed the first 1.8km section of Route 1 of Council's [Bicycle Route Construction Priority Projects](#). This route will eventually become the major north/south "spine" from which the rest of Randwick's proposed cycle network will be developed. Council's priority cycle projects were established following community consultation. The Council continues to work on various cycleways within the identified network, often funded by federal and state government.

Shared e-bikes are also well used in the Randwick LGA. Unfortunately, however, with the way they are being used, there have been safety and parking issues that impact the community. Council was one of six Sydney councils that were instrumental in developing the [Inner Sydney Guidelines for Dockless Bike Share Operators](#) (December 2017,). These guidelines set out our expectations for dockless bike share operators. They were put together by the City of Canada Bay, the City of Sydney, Inner West, Randwick, Waverley and Woollahra councils with bike share operators and other stakeholders. Although Council is working closely with the shared e-bike operators, the safety and parking issues still remain.

With regard to e-scooters, Council recognises that Transport for NSW continues the e-scooter trial. Randwick Council resolved to review the outcomes of other councils to determine whether Council will participate in future trials or not. This is currently under review, however, the shared e-bikes management and issues remain a factor in this consideration.

### **The Community's concerns about bicycles, e-bike or e-scooters**

The Council has been listening to the community's concerns and gathering feedback on micromobility in general. The specific topic of concerns that are generally raised by community members are:

1. **Safety on Footpaths and Roads:** Many community members have expressed concerns about the safety issues created by micromobility both on roads and footpaths. There have been numerous reports of near misses or incidents involving pedestrians, including children and elderly persons, with bicycles, e-bike or e-scooters riding on the footpaths. Similarly on the roads, drivers question where e-mobility should be on the road. Micromobility users, on the other hand, report near misses and concerns around their safety when riding alongside parked vehicles or alongside moving vehicles; they have requested improved, safer, infrastructure.
2. **Regulation and Enforcement:** There are numerous concerns about where the e-mobility riders can legally ride, how fast they can ride, how e-mobility users can be held responsible for their actions. Unfortunately, Council has no easy method to enforce existing rules and enforcement is difficult when there is no way to identify the micromobility users.
3. **Lack of Infrastructure:** Safety of micromobility users in Randwick is frequently questioned as most bike infrastructure remains on the road. Although Council's current focus is delivering safe cycleways, the current infrastructure is deemed by some to be inadequate to address the growing number and type of e-mobility users. Constructing new cycleways is also very costly and these cannot be achieved within Council's limited budget.
4. **Shared Bike Parking:** Shared e-bikes are well used but are parked mostly anywhere creating safety issues or a nuisance for community members. Council is working with shared e-bike operators, however, there is no enforcement action that Council can take.

## **Regulatory Framework**

It is unclear where e-mobility sits in the current NSW regulatory framework.

The definition 'vehicle' in the NSW Road Rules 2017 only includes a 'bicycle', 'a motorised wheelchair that can travel at over 10 kilometres per hour (on level ground)' and 'an electric skateboard'. It specifies that it "does not include another kind of wheelchair, a train, or a wheeled recreational device or wheeled toy". A person in or on a 'wheeled recreational device' or 'wheeled toy' is included in the definition of a 'pedestrian' and therefore may use a footpath. These definitions do not include the different types of e-mobility currently that are in use. This lack of inclusion creates a challenge in where, upon the road, the various e-mobility devices can be legally used.

Specifically for e-bikes, there is information provided on Transport for NSW website listing the type of permitted e-bikes with specifications such as type of motor, speed, weight, etc. and stating that "e-bikes that comply with regulations are considered equivalent to bicycles, and the same road rules apply". Even as such, the enforcement by Police would be difficult, identifying the type of e-bikes or the user once they have ridden past.

In terms of planning for road infrastructure for e-mobility, the NSW Road User Space Allocation Policy and TfNSW for NSW Active Transport Strategy and other documents do include them as "cycling (including legal micro-mobility devices)" or micromobility devices.

The TfNSW "Cycleway Design Toolbox" contains the definition of cycling and micromobility as "cycling and micromobility includes human or electric-powered personal mobility devices such as conventional bicycles, tricycles, electric assist bicycles (e-bikes), kick scooters, cargo bikes (which can carry loads or passengers) as well as share bikes. In the future it may also include e-scooters, delivery robots and other innovative personal mobility devices." This definition does include the different types of e-mobility currently in use as well as leaving it open for possible types to come in the future.

The TfNSW Road User Space Allocation Policy, Active Transport Strategy, Cycleway Design Toolbox and other related policies and guidance do allow prioritisation of bicycle infrastructure and provide guidelines on how to best incorporate them. However, a shortfall is that the current design standards and guidelines are for cycleways, shared paths and bike lanes, all specific to bicycles, perhaps leaving it unclear for the micro-mobility user. The bicycle stencils, signs, consideration of bicycle envelop, parking infrastructure, etc. may not translate to the other e-mobility users that they are allowed on the bicycle infrastructure.

## **Safe Bicycle Infrastructure**

To address the community's concern on the safety of bicycle and e-mobility riders, as well as other road users, providing the safe separated bicycle infrastructure is the key. As mentioned previously, state government have been supporting local government deliver separated cycleways through funding programs and continuous support throughout the project. These programs and support are very welcomed and are much needed to continue to ensure that NSW and our Council promotes healthy and safe communities. Such bicycle infrastructure, in the end, would also support all e-mobility devices that are legally permitted in NSW, hence continued support for the delivery of additional cycleway infrastructure is considered critical.

Similar to the increasing support of the essential infrastructure by the state government, NSW's support in the education of the safety and community benefits of active transport and behavioural change programs to supplement the infrastructure improvements are need to help the general public as well as professionals better understand why these changes are needed.

## **Shared E-bikes**

In addition to the e-mobility itself, Randwick Council has received high number of complaints regarding shared e-bikes in Randwick. This is due to the fact that the current system does not have any way for Councils to regulate the shared e-bike operators. As mentioned above, some Councils have agreed on [Inner Sydney Guidelines for Dockless Bike Share Operators](#) and they are shared with the shared e-bike operators. Unfortunately, in reality, operators are allowing any hirer to park their e-bikes anywhere, unless identified as no-parking zone by the operator. Council work closely with the shared e-bike operators and they are generally very responsive but the rate at which the e-bikes are serviced is lacking and hence the general public's perception around e-bikes are negative. There is also a lack of education for the users – the bikes can be used by those who may not ride a bike or have a licence to drive in NSW and users may not be aware of the Road Rules.

Given that these shared e-bike operators operate between various Councils and given the limited authority that Councils have over e-bike operators, NSW's leadership in regulatory framework around this space is also critical.

## **Battery safety**

With the recent fire incidences around the world related to e-mobility batteries, there should be proper regulation around the e-mobility technology to ensure public safety, similar to how a motorcycle or vehicles require certain standards.

Proper education should be provided to e-mobility users to ensure proper use and storage of the e-mobilities.

There also should be guidance from state government on parking facilities that incorporates safe charging facilities with mitigative measures in the event of a lithium battery fire.

Guidance and provision of proper disposal of the batteries would also be beneficial when considering the type of e-mobility technology to permit. Council look forward to the new safety standards for lithium-ion batteries in e-mobility devices in 2025.

## **Council's Needs for Safe E-Mobility**

The benefits of active transport are already well known in the community and the NSW government in terms of healthier community, environmental benefits, etc. It is evident in the policies and programs that NSW government is pushing for.

As mentioned, e-mobility devices are being well used in Randwick and the increase in the number of women using e-mobility in the last two years, supports gender equity within the active transport field. Although a small sample, it demonstrates that our community members are increasingly adopting the use of e-mobility devices.

In Australia, the increase in e-bike and e-scooter sales shown in [Australian Cycling and e-Scooter Economy in 2022](#) (We Ride Australia, dated 10 November 2023) indicates that the percentage of e-bikes and e-scooters sales have increased from 2020.

As with every Sydney council, Randwick has to manage the effects of increased residential density as mandated by the state government. In order to enable communities to be better connected within the limited space in these urban environments, different transport modes should be considered and incorporated around clear rules and guidelines. Given that people are using the technology based on the data as well as the community concerns that Council receives, this opportunity that NSW government provided to review the new technology and to show leadership and guidance to ensure the safety, health and environment of our communities is greatly welcomed.

Based on the above, the following requests are made to NSW government with regards to e-mobility:

- **Review Regulatory Framework:** The current regulatory frameworks should be reviewed and evolved to include e-mobility to provide clear regulations and guidance that specify where and how they should be ridden, parked and maintained. This includes setting speed limits, defining permissible areas for use, and ensuring that devices meet safety standards. This will protect the general public as well as the e-mobility users as well as provide the ability to enforce.
- **Building Dedicated Infrastructure and Providing NSW's Guidance:** Along with the regulatory framework, guidance on effective design of dedicated paths / lanes and parking areas for e-mobility to separate them from pedestrian and vehicular traffic is critical. There are various helpful NSW policies and guidance that allow better micromobility infrastructure but more training and education is needed in the transport industry. It should consider the user experience and ways to include e-mobility rather than only bicycles.
- **Public Education:** Based on some road behaviours, and queries received from communities, it seems that it may not be clear how an e-mobility device should or should not be used in general. The micromobility users could be better educated on the Road Rules, how they should be safely riding on the road and how e-mobility should be maintained. Additional education to the public, especially for motorists, of the rules, safety facts and how they can be safe around micromobility users - to ensure all users are safe. Educational campaigns to inform the public about the safe use of e-mobility, for example, mandatory sharing of information through training or shared brochure to go through the rules by the seller to a purchaser. It could also be included in the Transport for NSW A Guide to the Driving Test.
- **Battery Safety Measures:** Guidelines for the safe use, storage, and disposal of batteries used in e-mobility devices is critical given the risk of fires and environmental harm that is evident in the incidents around the world. Guidance on safe e-mobility parking areas in private properties or public spaces in terms of provision and new infrastructure may further lower the risk.
- **Data Collection and Research:** Require all shared e-mobility operators to release live, open source, data for review by government, councils and the general public. Invest in the gathering and subsequent release of any additional data and research so that agencies can monitor the impact of micromobility on traffic, safety, and the environment. This will provide a valuable indication of trends as well as providing important insights for future public policy considerations, in a transparent manner.

In conclusion, while e-mobility options offer significant benefits in terms of convenience and sustainability, it is crucial to address the safety concerns raised by the community. With the suggestions outlined above, Randwick Council looks forward to working with the NSW government as it leads the way to creating a safer and more efficient environment for all road users.

Yours sincerely,

**Tony Lehmann**

Manager Integrated Transport, Randwick City Council

<p><b>English</b></p> <p>If you need help to understand this letter, please come to Council's Customer Service Centre and ask for assistance in your language or you can contact the Telephone Interpreter Service (TIS) on 131 450 and ask them to contact Council on 1300 722 542.</p>	<p><b>Greek</b></p> <p>Αν χρειάζεστε βοήθεια για να καταλάβετε αυτή την επιστολή, παρακαλείστε να έρθετε στο Κέντρο Εξυπηρέτησης Πελατών της Δημαρχίας (Council Customer Service Centre) και να ζητήσετε βοήθεια στη γλώσσα σας ή τηλεφωνήστε στην Τηλεφωνική Υπηρεσία Διερμηνέων (Telephone Interpreter Service — TIS) τηλ. 131 450 και να ζητήσετε να επικοινωνήσουν με τη Δημαρχία τηλ. 1300 722 542.</p>	<p><b>Italian</b></p> <p>Se avete bisogno di aiuto per capire il contenuto di questa lettera, recatevi presso il Customer Service Centre del Municipio dove potrete chiedere di essere assistiti nella vostra lingua; oppure mettetevi in contatto con il Servizio Telefonico Interpreti (TIS) al 131 450 e chiedete loro di mettersi in contatto col Municipio al 1300 722 542.</p>
<p><b>Croatian</b></p> <p>Ako vam je potrebna pomoć da biste razumjeli ovo pismo, molimo dođite u Općinski uslužni centar za klijente (Council's Customer Service Centre) i zatražite pomoć na svom jeziku, ili možete nazvati Telefonsku službu tumača (TIS) na 131 450 i zamoliti njih da nazovu Općinu na 1300 722 542.</p>	<p><b>Spanish</b></p> <p>A la persona que necesite ayuda para entender esta carta se le ruega venir al Centro de Servicios para Clientes [Customer Service Centre] de la Municipalidad y pedir asistencia en su propio idioma, o bien ponerse en contacto con el Servicio Telefónico de Intérpretes ["TIS"], número 131 450, para pedir que le comuniquen con la Municipalidad, cuyo teléfono es 1300 722 542.</p>	<p><b>Vietnamese</b></p> <p>Nếu quý vị không hiểu lá thư này và cần sự giúp đỡ, mời quý vị đến Trung Tâm Dịch Vụ Hướng Dẫn Khách Hàng của Hội Đồng Thành Phố (Council's Customer Service Centre) để có người nói ngôn ngữ của quý vị giúp hay quý vị có thể liên lạc Dịch Vụ Thông Dịch qua Điện Thoại (TIS) ở số 131 450 và yêu cầu họ liên lạc với Hội Đồng Thành Phố (Council) ở số 1300 722 542.</p>
<p><b>Polish</b></p> <p>Jeśli potrzebujesz pomocy w zrozumieniu treści tego pisma, przyjdź do punktu obsługi klientów (Customer Service Centre) przy Radzie Miejskiej i poproś o pomoc w języku polskim, albo zadzwoń do Telefonicznego Biura Tłumaczy (Telephone Interpreter Service — TIS) pod numer 131 450 i poproś o skontaktowanie się z Radą Miejską (Council) pod numerem 1300 722 542.</p>	<p><b>Indonesian</b></p> <p>Jika Anda memerlukan bantuan untuk memahami surat ini, silakan datang ke Pusat Pelayanan Pelanggan (Customer Service Centre) Pemerintah Kotamadya (Council) dan mintalah untuk bantuan dalam bahasa Anda, atau Anda dapat menghubungi Jasa Juru Bahasa Telepon (Telephone Interpreter Service - TIS) pada nomor 131 450 dan meminta supaya mereka menghubungi Pemerintah Kotamadya pada nomor 1300 722 542.</p>	<p><b>Turkish</b></p> <p>Bu mektubu anlamak için yardıma ihtiyacınız varsa, lütfen Belediye'nin Müşteri Hizmetleri Merkezi'ne gelip kendi dilinizde yardım isteyiniz veya 131 450'den Telefonla Tercüme Servisi'ni (TIS) arayarak onlardan 1300 722 542 numaradan Belediye ile ilişkiye geçmelerini isteyiniz.</p>
<p><b>Hungarian</b></p> <p>Amennyiben a levél tartalmát nem érti és segítségre van szüksége, kérjük látogassa meg a Tanácsház Ügyfél Szolgálatát (Customer Service Centre), ahol magyar nyelven kaphat felvilágosítást, vagy hívja a Telefon Tolmacs Szolgálatot (TIS) a 131 450 telefonszámon és kérje, hogy kapcsolják a Tanácsházat a 1300 722 542 telefonszámon.</p>	<p><b>Czech</b></p> <p>Jestliže potřebujete pomoc při porozumění tohoto dopisu, navštivte prosím naše Středisko služeb pro veřejnost (Council's Customer Service Centre) a požádejte o poskytnutí pomoci ve vaší řeči anebo zavolejte Telefonní tlumočnickou službu (TIS) na tel. číslo 131 450 a požádejte je, aby oni zavolali Městský úřad Randwick na tel. číslo 1300 722 542.</p>	<p><b>Arabic</b></p> <p>إذا أردت مُساعدة لفهم هذه الرسالة، نرجوك الحضور إلى مركز خدمة عملاء المجلس وأطلب المساعدة في لغتك، أو يُمكنك الاتصال بخدمة الترجمة الهاتفية (TIS) على هاتف رقم 131 450 وأطلب منهم الاتصال بالمجلس على رقم 1300 722 542.</p>
<p><b>Chinese</b></p> <p>如果你需要人幫助你了解這封信的內容，請來市政會顧客服務中心要求翻譯服務，或者與電話傳譯服務 (TIS) 聯繫，號碼是 131 450。請他們幫助你打電話給市政會，號碼是 1300 722 542。</p>	<p><b>Russian</b></p> <p>Если Вам требуется помощь, чтобы разобраться в этом письме, то, пожалуйста, обратитесь в Муниципальный Центр Обслуживания Клиентов и попросите оказать Вам помощь на Вашем языке или же Вы можете позвонить в Телефонную Службу Переводчиков (TIS) по номеру 131 450 и попросить их связаться с Муниципалитетом по номеру 1300 722 542.</p>	<p><b>Serbian</b></p> <p>Ako vam treba pomoć da razumete ovo pismo, molimo vas da dođete do Centra za usluge mušterijama pri Opštini (Customer Service Centre) i zamolite ih da vam pomognu na vašem jeziku, ili možete nazvati Telefonsku prevodilačku službu (TIS) na 131 450 i zamolite ih da vas povežu sa Opštinom na 1300 722 542.</p>