
25th October 2022

Rob Sharp

Secretary, Transport for NSW
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Cc **Trudi Mares**, Deputy Secretary Greater Sydney
Cc **Camilla Drover**, Deputy Secretary, Infrastructure and Place
Cc **Simon Hunter**, Chief Transport Planner, TfNSW

Dear Rob Sharp,

This is the WalkSydney submission on the [Western Distributor Road Network Improvements \(from Anzac Bridge to the Sydney Harbour Bridge\) Review of Environmental Factors \(Sep-Oct 2022\)](#).

WalkSydney is the peak advocacy group working to make it easier, safer and more pleasant to walk in Sydney. WalkSydney's vision is that "Walking will be convenient, accessible, safe and enjoyable for everyone."

With a growing population we need to ensure people can easily walk, ride and catch public transport to local shops, services and places. We are very concerned about the Western Distributor project and its impacts on walking, riding bikes and the streets of the Pyrmont peninsula. We want TfNSW to abandon this proposal and instead prioritise investment in Pyrmont/Ultimo consistent with the Place Strategy, ahead of investing in motorway related improvements.

Why is TfNSW proposing this scheme now?

- The REF says the proposal is required because motorists using this route experience high congestion and long traffic queues, particularly during the morning peak.
- WalkSydney Factcheck: Proposals to direct more traffic from the Anzac Bridge through Pyrmont have been made several times before ("The Bays Precinct Pyrmont Traffic Improvement Project"), and rejected for lack of strategic merit and unreasonable impacts.

Westconnex will open in less than 6 months. TfNSW says

"the benefits of Stage 3 are improving motorway access and connections to Western Sydney and key employment hubs across the city, moving traffic and heavy vehicles to the underground motorway, reducing traffic on local streets and creating opportunities for urban renewal."

If Westconnex is already providing these benefits why do we need this proposal? Is TfNSW changing its assessment of the benefits of Westconnex? Will Westconnex fail and traffic and heavy vehicles not move to the underground motorway? Conversely, if these changes are required because WestConnex is now predicted to funnel more traffic into Pyrmont, do you consider it a good solution to make 'two wrongs' to address this?

What is the project justification? "Traffic queues and traffic growth"

- REF says 'bottlenecks' at Allen / Harris Street and long delays in the AM peak. Traffic queue onto the Western Distributor impacting on traffic efficiency.



- WalkSydney Factcheck: Vehicles counts in Pyrmont have been stable for over a decade. Improving the flow of traffic through Pyrmont by removing parking and reducing delays at intersections will induce more traffic through the peninsula. Removing the pedestrian crossing will make it harder for people to walk and ride in Pyrmont, entrenching the flow of traffic on Harris St reduces amenity and safety for the people who live in Pyrmont/Ultimo. The Government has invested billions in Westconnex to provide a bypass and access south of the CBD, continuing to provide an inner bypass on local streets makes no sense. The Westconnex project gets less than 10 lines of text in the 300 page REF despite being the most significant road investment project in NSW history!

TfNSW have invested in the new Western Sydney Metro with a new station to provide rapid and efficient access to jobs, homes and places in Pyrmont. Regional travel demand growth previously addressed by the Western Distributor will transition to a more efficient mass transport option in Pyrmont, and regional travel will have access to the WestConnex motorway. Making walking and cycling more unattractive in Pyrmont will undermine this investment in Pyrmont as a place, as well as Metro as a mode

The proposal makes it seem TfNSW is not serious about walking and cycling

- The REF says walking in Pyrmont (p74 - 36.8% walk to work) has the highest walk mode share in the City of Sydney, if not Greater Sydney.
- WalkSydney says: If so, this project is inconsistent with improving amenity for people walking and riding. Crossings must be restored. Footpaths must be widened and separated bike infrastructure must be provided *before we build more motorway ramps*.

By removing pedestrian crossings, this proposal pumps more traffic into one of the most densely populated areas in Australia. Removing buffers from fast moving traffic (parked cars), removing and widening pedestrian crossings, removing trees are direct impacts on people walking along the main pedestrian spine of the peninsula. Impacts on the main pedestrian entrance to Darling Harbour – Tumbalong Boulevard – are no less severe.

Pyrmont should be a model for achieving the strategic vision outlined in the Future Transport Strategy, not a 'Back to the Future' own-goal prioritising more cars.

Vision Zero is a cornerstone of TfNSW strategic investment, this project is about traffic efficiency not safety

- The REF says there are over 100 crashes occurring eastbound on the Western Distributor.
- WalkSydney Factcheck: An analysis of publicly available road safety data shows that between 2007 and 2020 there has been one fatality, and on average 2.7 serious injury crashes per year. The total number of crashes during this 13 year period is less than 35. No analysis of the potential worsening of road safety along Harris Street has been undertaken – an AusRap assessment comparison of Harris Street and the Western Distributor would indicate, there is a greater risk of future fatalities on Harris St as a result of the works.



While stating there are crashes in the REF, no analysis of how these will be mitigated is provided, and the scheme is based on flawed or inaccurate data and calls in question TfNSW commitment to vision zero when it prioritised an investment on a small section of a motorway above other road safety interventions such as 40km/hr across Sydney. Between 2007 - 2020 more than 30 people were killed crossing streets in the CBD. There are five times as many people walking in the City as driving cars on motorways, why aren't we investing a similar amount to save lives of people walking? TfNSW's own economic investment guide requires road safety investment in the most important places.

The project is not compatible with a “place-based approach” per the Pyrmont Place Strategy

- The REF says the project objectives “align with the future needs of the Pyrmont area as it aims to improve safety on the Western Distributor at the Darling Harbour weave area through constructing a new weave ramp to avoid the traffic merging issue and improve Western Distributor off ramp traffic efficiency. Improvements at the Pyrmont Bridge Road and Allen Street intersections would also support traffic efficiencies at these locations.”
- WalkSydney Factcheck: The project is not aligned to the Pyrmont Place Strategy . The proposal's impact, particularly on Harris St, contradicts the place analysis and strategic vision for Pyrmont. The Pyrmont Peninsula Place Strategy (PPPS, DPE, 2020) supports more walking and cycling, and making Harris St more multi-modal and pedestrian friendly.

Failure to align with Government endorsed strategic plans, the place vision and the local transport context is a serious flaw in the development of the proposal. The NSW Community rely on transparent and robust planning processes to guide land use changes that should then shape transport investment. The proposal has adopted a traffic solution to land use change and population growth, even though there is a place strategy that proposed a completely different approach. This type of opaque decision making process undermines the Community's trust in Government to make good decisions.

The PPPS transport strategy includes **outcome E - reallocate road space away from private car** - and to pedestrians. It discusses the role of Harris St, a key activity street, classified as a local street (M&P Framework) with high walk/cycle mode share. The proposal ignores this outcome and proposes removal of a pedestrian crossing and buffer to pedestrian space, as well as inhibiting future footpath widening and dedicated bus and cycle lanes.

Why should local Communities trust the Government to make decisions on their behalf if these commitments can be ignored by highway and traffic engineers without regard for local places and transparent processes?

In particular, the proposal contradicts or hinders the following elements of the PPPS:

- Direction 3: Centres for residents, workers and visitors (also Direction 6, 7)
"Place Strategy response:
 - *Harris Street rejuvenation through a new street-based transport route creating new hubs of activity at each stop, improving the safety and enjoyment of this important historic street.*"
- Direction 7 / Place Strategy response:



"Investigation of a new street-based public transport link (such as bus or other mode) along Harris Street providing connectivity along the Innovation Corridor from Central to the Bays and increased frequency of the Inner West Light Rail."

- Structure Plan (Section 08):
"Harris Street Upgrades to public transport, footpaths and shopfronts link existing clusters of businesses and homes along the peninsula's historic main street. This is a diverse, affordable, eclectic place of enterprise and economy - linking the peninsula to the broader Innovation Corridor."
- At a Glance p56 **"Heavy vehicle traffic along Harris Street hinders the pedestrian or cyclist experience."**
- Ultimo Place Priorities:
"2. Rejuvenate Harris Street as the historic urban spine of the Peninsula:
 - a. consider Streets as Shared Spaces.*
 - b. create an intermediate public transport corridor along the Innovation Corridor from the Bays Precinct to Tech Central and Australian Technology Park.*
 - c. investigate the reduction in traffic lanes and conversion to allow for a contra-flow bus lane between Thomas Street and Regent Street.*
 - d. widen footpaths, calming traffic, rationalising bus stops and providing new pedestrian crossings.*
 - e. create active transport connections to Harris Street from surrounding areas.*
 - f. improve the streetscape and activation, enhancing heritage buildings and increasing tree cover.*
 - g. install heritage interpretive elements*
 - h. create new centres of activity as major sites are developed, with new connections and open spaces and busy street frontages to **transform Harris Street into a pleasant pedestrian environment.**"*

We are in a climate emergency - loss of tree canopy is not acceptable

- The REF says the proposal will result in the removal of 71 trees.
- WalkSydney says – The loss of trees due to the construction and associated compounds for works is not acceptable.

The highly urbanised peninsula has relatively low canopy cover and any further loss stands to worsen urban heat and reduce walkability. The project recognises that the significant trees in Zone K (Tumbalong Boulevard, Darling Harbour) are to be lost. No design options appear to have been done to reduce this impact.

Zone G – the intersection of Allen St and Harris Street – stands to lose 10 fully-mature street trees on the north and western sides of the intersection (Appendix C, p43). These shade the western-side pedestrian crossings during lunch and from hot afternoon sun in an area of active frontage – the preferred side of the street for locals and providing the greatest amenity – local fresh food and food retail. There is no mitigation proposed for this intersection, and this will significantly worsen walkability in this area (as will wider crossings on these junction arms).



The current flooding disaster across Victoria, northern and western NSW highlights how important trees are to reducing the impacts of CO₂ emissions. It is not acceptable to cut down trees for cars to park, construction compounds and projects that enable greater volumes and faster car travel.

The consultation is inadequate

- The REF says TfNSW will consider feedback about construction impacts.
- WalkSydney says – The community were blindsided by this proposal, despite numerous strategic planning processes occurring in Pyrmont over the past five years this project has never been mentioned. Consultation is being run over school holidays limiting the number of people able to participate! TfNSW already has a poor reputation for listening to community concerns. In this instance, the project appears to have gone to significant lengths to minimise feedback and limit community input. Was the Government deceiving local residents and stakeholders when it released its plan for the area?

The online REF feedback mechanism is inadequate. The online form and a single paragraph box, without proper mechanism for detailed comments about the proposal is flawed. The feedback form will restrict and inhibit objections. We understand that limited agency consultation was undertaken prior to public exhibition - and limited to only defined components of the project such as the ANZAC sculptures.

While general public consultation was inadequate, were commercial interests privately consulted separately? We insist that all communications with commercial interests, including toll road operators, about this project be made public.

It is ironic that the Executive Summary mentions “consultation fatigue” - it is unclear why this project would be up for consultation when previous iterations of the same project have already been rejected.

The proposal does not represent value for money

- The REF does not disclose the cost of the project, although 1000 workers will be employed for 2 years. The overall benefits of spending hundreds of millions of dollars is not quantified.
- WalkSydney says: The cost of the project can be estimated in the hundred of millions based on the number of workers and the length of construction. The efforts of these works would be better aimed towards projects that improve our cities. The Government should quantify how many lives will be saved and how much time saved for motorists (Seconds !). Is any of the time saved “productive”? How much pedestrian time and how many pedestrian lives will be lost by the additional inconvenience and the reduction in crossing points? What health costs will be incurred by making physical activity dangerous and unpleasant for locals and people travelling by public transport? What increase in vehicle emissions are associated with this project? Will these be paid for with expensive offsets?

In contrast if this money was spent on place enhancements as described in the Pyrmont Place Strategy or the Tech Central Transport Plan, the livability, economic productivity and safety of all



transport users, including people walking, would be improved. For example: the footpath along Bridge Road is less than 2m wide in some sections, and does not provide comfortable and safe space for people walking, and will significantly worsen with the opening of Metro, Fish markets, and the Blackwattle Bay development.

Pymont Bridge, a significant transport heritage item, remains in very poor condition, despite its recognised strategic merit in providing local connectivity to the Bays West. Without reallocation of road space from vehicles to people, walking to the Pymont Metro will be more difficult, encouraging more vehicles.

A place-based approach to transport funding should have identified these options in the Strategic Business case phase - Gate 1 as preferable to the proposal.

TfNSW must undertake a transparent and thorough investigation to solve Pymonts growing transport demands

WalkSydney recommends that the project does not proceed. Any investment in Pymont/Ultimo should focus on improvements consistent with the Place Strategy, and the current Pymont Transport Plan over any other motorway related improvements.

Thank you for taking the time to read our feedback.

Yours sincerely,

Lena Huda

President, WalkSydney

