



THE PEAK BODY FOR WALKING IN GREATER SYDNEY

31 July 2026

Josh Murray
Secretary Transport for NSW
Also lodged via: haveyoursay.nsw.gov.au/fifteenth-avenue-upgrade-ref

Dear Mr Murray

Submission — Fifteenth Avenue Upgrade: Review of Environmental Factors (exhib 29/6 – 31/7)

WalkSydney is the peak body for people who walk in New South Wales. Our interest in the Fifteenth Avenue Upgrade is twofold: that the corridor is delivered as the safe, connected, multimodal transit corridor that government committed to and the community was promised, rather than as a road widening; and that the environmental assessment underpinning it is rigorous and honest. Unfortunately neither have been delivered by TfNSW proposal.

The central argument of this submission is :

1. Transport for NSW **not** determine this proposal under Division 5.1 of the *Environmental Planning and Assessment Act 1979* on the current REF, and therefore should instead prepare an **Environmental Impact Statement**. We set out four matters below, with supporting evidence in the appendices attached.
2. The proposal falls well short of what was promised and overvalues fast moving vehicles at the expense of local people (as articulated by their democratic elected representatives) and even when TfNSW could deliver better outcomes the proposal still *skims on infrastructure for the most vulnerable people*.

1. The proposal is likely to significantly affect the environment and requires an Environmental Impact Statement. I am requesting that you urgently review the legal status of the assessment which may not comply with state and federal requirements.

Transport for NSW's own technical assessment establishes that the proposal is likely to significantly affect a critically endangered ecological community — the test that, under section 5.7 of the EP&A Act, requires an EIS. In particular:

- Transport's own Biodiversity Assessment Report (REF Appendix J) **identifies the clearing of Cumberland Plain Woodland — a Critically Endangered Ecological Community — as a *potential Serious and Irreversible Impact***, while the REF concludes the proposal is "not likely to significantly affect" any ecological community. An impact the proponent's own assessment flags as

potentially serious and irreversible cannot be resolved by a screening-level finding of "not significant."

- Appendix J confirms the proposal would clear this community in **"moderate to good" condition**, in a landscape where it is **already 81.74 per cent cleared** and past the critical threshold the report itself warns against — directly refuting the REF's reliance on the presence of "similar habitat" nearby.

The full basis for this request, including why the significance finding applies the wrong test and why the stated clearing extent is understated, is set out in **Appendix 1 — The case for an Environmental Impact Statement**.

2. The proposal departs from the transit corridor that government committed to and that the elected Council and community continue to seek and ignores the views of local people democratically elected representatives.

The Fifteenth Avenue corridor exists in policy as a public transport project. Under the Western Sydney City Deal, the NSW Government committed to a rapid bus connection between Western Sydney International Airport, Bradfield and Liverpool, and the Fifteenth Avenue Smart Transit (FAST) Corridor was developed as a place-led, multimodal transit corridor **in partnership with Liverpool City Council**. What the REF delivers is materially less, and it proceeds against the clearly stated position of the elected local council:

- The REF delivers a **four-lane arterial road**, with the transit function reduced to a **future, unfunded corridor** and land merely reserved. Liverpool City Council's adopted position is a high-capacity **transit boulevard of at least six lanes including a dedicated fast transit corridor, footpaths and cycleways**; the Mayor has stated publicly that the upgrade "cannot just be about widening the current road" and that a key objective must be to reduce reliance on private vehicles. Transport for NSW briefed Council on its four-lane design in July 2026.
- Transport for NSW is compulsorily acquiring **Council-owned land** to deliver this design — advancing, on land taken from the local authority, a proposal that the same authority and its community campaign do not support.

Proceeding with a road widening while the promised transit corridor remains unfunded and deferred, over the endorsed position of the democratically elected council that helped design the corridor, is a poor outcome for local decision-making and for public trust in collaborative, place-based planning. It is difficult to reconcile with Transport for NSW's own Movement and Place framework, or with the City Deal commitments the corridor was created to deliver. Where a State agency sets aside a co-designed local vision and acquires council land to build a lesser proposal the council opposes, is not merely a design disagreement — it goes to how TNSW is failing at working with communities and their elected representatives.

A bus corridor was promised - a major arterial road with little if any priority for people walking riding and catching public transport has been proposed.

3. The design parameters prioritise fast-moving vehicles at the expense of local access, people walking and people riding

The design criteria in the REF (Table 3-1) are those of a high-speed movement corridor, not the urban arterial serving emerging centres that the corridor is meant to be. Three parameters, taken from Transport for NSW's own design criteria, drive a cross-section that severs the road from the land beside it and makes the corridor hostile to people walking and riding. *Critically the proposal creates major severance and sterilises land preventing the Governments housing agenda:*

- **A design speed of 80 km/h.** This exceeds every speed band in the REF's own Movement and Place typology for the corridor, which identifies transit-arterial sections at 40–60 km/h, an arterial high-street section at 40–50 km/h, and secondary-arterial sections at 60–70 km/h — none at 80 km/h. The high design speed drives flatter grades and lowered crests, raising road levels up to eight metres above the surrounding ground and, in Transport's own words, lowering existing crests "to achieve the design speed." Faster vehicles, with less adjacent land use connectivity— in other words less housing.
- **A 19-metre semi-trailer design vehicle and a 26-metre B-double checking vehicle.** Designing turning paths and intersections around the largest heavy vehicles produces wide through lanes (3.5 metres), wide kerbside lanes (4 metres) and large intersections — lengthening every crossing a person on foot must make, and consuming frontage that would otherwise support adjacent land use.
- **Flood immunity to the 1% AEP.** Raising the road to a one-in-100-year flood standard, together with the design-speed geometry, produces embankments and retaining walls up to eight metres high. A road set behind a multi-metre retaining wall cannot be crossed, and the land uses beside it cannot be accessed from it. Who wants to live looking at a retaining wall? How are massive retaining walls consistent with the housing we need to deliver in Western Sydney.

The cumulative effect is a road that people cannot readily cross and that turns its back on the land uses beside it — the opposite of the vibrant, accessible urban arterial the corridor was intended to become, and inconsistent with the place outcomes the REF's own Movement and Place analysis says it will deliver.

4. The detailed design short-changes people walking, riding and catching the bus — especially those most dependent on them

Beyond the parameters above, the specific provision for people walking and riding falls well short of the multimodal corridor that was promised, and create massive severance and does so at the expense of the people who most depend on it:

- **Riding is provided on one side only, and mixed with walking.** The design provides a single four-metre shared path on the northern side and only a 1.5-metre footpath — the bare minimum — on the southern side. There are no separated walking and cycling facilities, and no riding provision at all on the southern side; a person riding on the south must cross the corridor to reach the path. This is well below the separated paths on both sides that the corridor's own vision documents describe. And inconsistent with Ministers desire to support more walkable environments as described by him at the recent Walkable NSW Discussion paper stakeholder workshop two weeks ago!

- **The corridor's edge is built to protect vehicles, not people — and cannot be “finished” away.** The elevated cross-section sits behind retaining walls up to eight metres high — a continuous hard edge oriented to the safety of vehicle occupants, not to the permeability, shade or comfort of people on foot. The REF's proposed mitigation for these walls — textured concrete panels, sandstone cladding, steel mesh screens and artwork treatments — changes only how the walls look, not what they do. A finish does not lower an eight-metre wall, make it crossable, or reconnect the land uses it severs. Tellingly, the urban design strategy proposes "visual separation between Fifteenth Avenue and adjoining land uses through ... screening vegetation" — screening the road off from the places beside it, which confirms the severance rather than curing it.
- **The green parkway that was promised is not secured.** The REF removes about 1.96 hectares of native vegetation and around 109 native and 184 amenity trees, and defers the landscape and canopy strategy to detailed design. What is committed is a hot, exposed, motorway-like edge — the opposite of the vegetated parkway the FAST Corridor was meant to be.
- **Existing bus stops are being cut back.** The REF proposes to rationalise existing bus stops and prioritise them to roads servicing future precincts — trading away service for the people who depend on the bus today, in an area where only around 2.4 per cent of households are car-free and cost-of-living pressure is acute. In addition TfNSW could choose to build every bus stop a shelter but instead have minimised the number of shelters with no justification. The roadside barriers, the lane widths, the design vehicles, speeds and flooding are all designed at the maximum – but bus shelters are provided as a minimum.
- **The crossings are built for vehicles, not for children or older people.** Opportunities to cross are limited to signalised intersections and a single mid-block crossing across the six-kilometre corridor — and each crossing spans four lanes, turn lanes and a median, scaled for 80 km/h traffic and 26-metre B-doubles. These are crossing distances and spacings that no parent would let a young child navigate alone, and that effectively exclude older people and anyone with limited mobility. Again how is this consistent with enabling more people to walk?

Taken together, these choices strand the people least able to drive — children, older people, and people without a car — on the wrong side of a corridor built for through-traffic. For a project whose stated purpose includes improving active and public transport and delivering equity in Western Sydney, it fails.

I am urging you to reconsider the proposal, consider how the project is connected to the adjacent land use and how it can be improved to reduce impacts by reducing the design criteria. I would also urge you to revisit the relationship between TfNSW and Council, it is a poor outcome for democracy when bureaucrats ride roughshod over democratically elected officials. I am requesting you investigate the justification for the current EIA pathway. The impacts on local bio-diversity require an Environmental Impact Statement. WalkSydney would be happy to meet with you and discuss these issues.

Yours sincerely

Tegan Mitchell, President WalkSydney

WalkSydney is the peak body advocating for walking in the Greater Sydney Region. Our vision is for walking to be the first choice for short trips around Sydney. Our three key asks are: a 30 km/h urban default speed; streets that are safe and easy to cross; and people

Appendix 1 — The case for an Environmental Impact Statement

The REF is assessed under Division 5.1 of the EP&A Act, with Transport for NSW as both proponent and determining authority. The only question that determines whether an EIS is required is whether the activity is likely to significantly affect the environment (section 5.7). On Transport's own evidence in Appendix J (Biodiversity Assessment Report), that threshold is met.

The significance finding applies the wrong test. The REF discounts the impact on the basis that similar habitat exists nearby and the works upgrade an existing road. Neither is the applicable test. Under the Commonwealth *Significant Impact Guidelines 1.1*, an action is likely to significantly affect a critically endangered ecological community where there is a real chance it will reduce the community's extent or increase its fragmentation — expressly including by clearing vegetation for roads. Appendix J's own data shows why "similar habitat nearby" cannot carry the conclusion here: the affected communities are already 81.74 per cent (PCT 3319), 78.22 per cent (PCT 4023) and 88.84 per cent (PCT 835) cleared, and the report warns that seemingly small further losses can push a community past its critical threshold to local extinction.

The stated 1.96 hectares is a floor, not the total. Detailed biodiversity assessment was undertaken for only two segments of the six-kilometre corridor; the remainder, being biocertified, was not assessed. Appendix J confirms the 1.96-hectare figure "does not take into account any impacts within the biocertified areas." A proposed construction compound at Craik Avenue would clear further Cumberland Plain Woodland with, in Transport's words, no assessment required because of its biocertified location. The true extent of critically endangered community cleared across the corridor is unquantified in the REF.

The cumulative impact is significant and undercounted. Appendix J estimates cumulative native-vegetation loss — including threatened ecological communities and threatened-species habitat — at 86.19 hectares, and concedes this figure omits projects located wholly on biocertified land, so the real total is higher. The proposal forms one segment of the Liverpool to Airport Transit Corridor and is assessed segment by segment; at the corridor and landscape scale, the loss of these critically endangered communities is plainly significant.

The precautionary principle requires the more rigorous pathway. The REF relies on the principles of ecologically sustainable development. Where the proponent's own report identifies a potential serious and irreversible impact on a critically endangered community already past its critical clearing threshold, the precautionary principle requires an Environmental Impact Statement — not a screening-level conclusion of "not significant."

Request. We ask that Transport for NSW prepare an Environmental Impact Statement under section 5.7 of the EP&A Act, together with a Biodiversity Development Assessment Report, and reconcile on the public record the inconsistent figures for the extent of critically endangered community affected (1.61 hectares in the REF; 1.46 hectares in Appendix J).

Kind regards,

Tegan Mitchell

President, WalkSydney

Canterbury Ward resident, Campsie

***WalkSydney** is the peak body advocating for walking in the Greater Sydney Region. Our vision is for walking to be the first choice for short trips around Sydney. Our three key asks are: a 30 km/h urban default speed; streets that are safe and easy to cross; and people walking prioritised over cars. WalkSydney is a member of the Better Streets coalition — a collection of hundreds of community organisations advocating for better streets in Australia.*

Yours Sincerely,

Name

President, WalkSydney

Sara Stace

President, Better Streets