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Dear Ms Garland

### **City of Sydney's submission on the Sydney Gateway Project Response to Submission report**

Thank you for the invitation to the City of Sydney (the City) to comment on the Sydney Gateway Project Response to Submission report (the report) that has been submitted to the Department of Planning, Industry and Environment (the Department) by Transport for NSW (TfNSW).

As the Department proceeds with its assessment of the project, the City asks that the Department comprehensively addresses the inadequacy of the active transport component of the concept design. The City believes the current design will deter people from walking and riding to and from the airport and that the design must be changed to ensure that people have more transport choices, particularly for the large number of people who live in the local community and work at the airport.

Below are the City's comments on TfNSW's response to the transport issues raised by the City in its submission on the Environmental Impact Statement (EIS) for the Sydney Gateway Road State significant infrastructure project (the project). Our submission follows the headings used by TfNSW in its report.

#### **Active Transport**

- The design for Sydney Gateway will deter people from walking and riding to and from the airport.

In the report TfNSW states that the principle objective of the project is to improve road capacity and that the limits in the available space prevent the provision of more cycling infrastructure. This is an inadequate response because it fails to respond in a holistic way to the NSW Government's overarching transport policies that emphasise the importance of active transport.

Choices will always need to be made about road space allocation, and in this instance TfNSW needs to give due consideration to how best to allocate space around the airport to achieve the NSW Government's aspirations to support active transport, as set out in *Future Transport 2056*.

**Recommendation**

That the Department drafts a condition that TfNSW amend the design of Sydney Gateway to ensure that the NSW Government's active transport policy and aims are achieved, including a direct cycling connection to the domestic terminal

**Public Transport**

- The Sydney Airport Station Access Fee acts as a significant barrier to people using public transport to and from the airport.

TfNSW has responded by noting that the station access fee is outside the project scope and that Transport's *More Trains More Services* program will increase capacity to the rail system. The City is of the view that without addressing the impact of the station access fee on people's travel choices, addressing capacity on its own will not be enough to see significant behaviour change.

**Recommendation**

That TfNSW remove the Sydney Airport Station Access Fee to eliminate this major penalty for travelling by public transport to the airport

**Increase in vehicle volumes**

- The Sydney Gateway provides a direct connection to WestConnex and St Peters Interchange. Vehicle volumes on the surface street network in the City are likely to increase as a result.

TfNSW does not believe the project will result in increases in vehicle volumes on the City's street network. The City continues to argue that in taking a whole of network view, we can expect to see vehicle volumes increase as a consequence of the direct connection between the Sydney Gateway and the New M5 at St Peters.

**Recommendation**

That the Department notes the divergence between the City and TfNSW's view on increases in vehicle volumes on the surface street network in the City as a consequence of the project.

**NSW Government public transport policy**

- There must be greater consideration of the benefits of public transport before this option is rejected in favour of further road expansion.

TfNSW maintains that in considering public transport it concluded that improvements in public transport was not a viable solution for the airport's key customer markets, particularly freight. The City is not persuaded that sufficient analysis was undertaken by TfNSW to comprehensively assess the options against the NSW Government's overarching public transport policy frameworks before coming to this conclusion. We believe more work needs to be done before rejecting improvements in public transport in favour of road expansion.

### Recommendations

- That prior to drafting conditions the Department instructs TfNSW to:
  - provide details of its analysis of potential improvements to public transport
  - explicitly address and justify the promotion of driving over public transport
- That the Department drafts a condition requiring TfNSW to amend the design of Sydney Gateway to achieve the NSW Government's public transport policy and aims

### NSW Government active transport policy

- The project has failed to provide an adequate walking and cycling connection between the regional cycleway, along Alexandra Canal, and the airport.

In its response TfNSW refers to active transport improvements being delivered as part of the *5 Year Ground Transport Plan*, and to working closely with the Sydney Airport Corporation (SAC) to 'explore options for active transport connections that could be delivered'. Both statements are short on detail and TfNSW must be required to specify exactly how it will deliver an adequate walking and cycling connection.

### Recommendations

- That prior to drafting conditions the Department instruct TfNSW to explicitly address and justify its promotion of driving over cycling access, and its failure to provide cycling facilities as part of this major road upgrade
- That the Department drafts a condition requiring TfNSW to amend the design of Sydney Gateway to achieve the NSW Government's active transport policy and aims
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### Cycleway along Alexandra Canal

- The Sydney Gateway EIS fails to indicate the extra time for walking and cycling trips as a consequence of the project, which will have an adverse impact on people who walk and bike

The report notes that TfNSW recognises the adverse impact of the project and is working with short listed contractors to improve outcomes during construction, and provide the relocated permanent active transport link along Alexandra Canal as soon as possible. TfNSW states that it is not possible to provide a temporary diversion that does not involve some increase in distance and travel time. The City notes that this project places an unfair imposition on people who walk and bike compared to people who drive and that TfNSW needs to do more to reduce this imposition.

### Recommendation

That the Department drafts a condition requiring TfNSW to reduce the imposition on people who walk and bike created by Sydney Gateway, and produce an implementation plan setting out how it will action this

### Facilities for active transport customers

- The following key active transport connections, discussed below, should be provided:
  - A direct, rideable crossing of the Cooks River connecting the south and Sydney city centre
  - Direct connections between the Alexandra Canal Cycleway and the T2 and T3 airport terminals as well as beyond the Bayside Council cycleway network
  - A direct cycleway connection between Coward Street and Sydenham station
  - Safe cycling and walking connections during the construction and operation of the Sydney Gateway
  
- ***A direct, rideable crossing of the Cooks River connecting the south and Sydney city centre***

In the report TfNSW notes that upgrading the Giovanni Brunetti Bridge would involve significant structural changes, and that given there are already two access routes to Tempe Reserve, further improvements are outside the project scope. It further notes that TfNSW is “committed to working with SAC to explore how the bridge can be upgraded during the delivery of a principle bike network being planned”. The City disagrees with TfNSW’s reasoning for deferring the upgrade to the Giovanni Brunetti Bridge and believes these improvements should be made now.

#### Recommendation

That the Department drafts a condition requiring TfNSW to provide a direct rideable crossing of the Cooks River connecting the south and Sydney city centre as part of the project

- ***Direct connections between the Alexandra Canal Cycleway and the T2 and T3 airport terminals as well as beyond the Bayside Council cycleway network***

In its response TfNSW merely notes that it is “working closely with SAC to explore options that could be delivered”. In the report TfNSW recognises the demand for these connections, accordingly this vague response is unsatisfactory. TfNSW needs to produce a detailed delivery plan to deliver these connections.

#### Recommendation

That the Department drafts a condition for TfNSW to produce a detailed delivery plan that sets out how it will provide direct connections between the Alexandra Canal Cycleway and the T2 and T3 airport terminals, as well as beyond the Bayside Council cycleway network, as part of the project

- ***A direct cycleway connection between Coward Street and Sydenham Station***

TfNSW states that this is outside the scope of the project but notes that it is working with SAC to deliver a shared path between Alexander Canal and Bellevue Street which would support this connection. The City acknowledges the value of this, but believes the work should be extended to include the connection between Coward Street and Sydenham station.

#### Recommendation

That the Department includes a condition requiring TfNSW to extend the shared path between Alexander Canal and Bellevue Street to include a connection between Coward Street and Sydenham Station, as part of the project

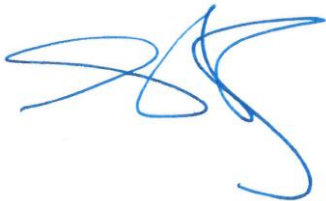
- **Safe cycling and walking connections during the construction and operation of the Sydney Gateway**

In its response TfNSW merely notes that it is 'committed to providing safe cycling and walking connections during construction and operation of the project in accordance with applicable safety and design standards'. TfNSW must go beyond simply committing to meet its obligations, and set out how it will deliver safe cycling and walking connections.

**Recommendation**

That the Department drafts a condition requiring TfNSW to produce an implementation plan setting out how it will deliver safe cycling and walking connections, as part of the project

Yours sincerely



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