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Naomi Moss  
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Via: NSW Planning Portal

Dear Naomi

**Western Harbour Tunnel and Warringah Freeway Upgrade - EIS SSI\_8863**

Thank you for the opportunity to provide comments on the Environmental Impact Statement for the Western Harbour Tunnel and Warringah Freeway Upgrade State Significant Infrastructure Project.

The key points that the City of Sydney wishes to raise are provided in the following pages.

Should you wish to speak with a Council officer about the above, please contact Elise Webster, Manager Transport Major Projects on 9265 9333 or at [ewebster@cityofsydney.nsw.gov.au](mailto:ewebster@cityofsydney.nsw.gov.au)

Yours sincerely,



**Graham Jahn AM**  
**Director**  
City Planning | Development | Transport

## Introduction

The City of Sydney (the City) has been a long-time critic of WestConnex. This is primarily because this costly motorway project will *fail in its primary objective of easing congestion*. Urban motorways do not solve congestion; they induce demand for motor vehicle trips and any additional capacity created is quickly filled. This phenomenon applies equally to the Western Harbour Tunnel and Warringah Freeway (the WHT) Project, a component of the WestConnex expansion.

The number of vehicles entering the city from the north and the Roselle area is currently limited by the capacity of the Sydney Harbour Bridge and the Anzac Bridge. These bridges also accommodate traffic which bypasses the CBD. When six separate bypass lanes are provided as part of the WHT project there will then be additional capacity on the Harbour Bridge and Anzac Bridge to access the CBD by vehicle. Accordingly, while the WHT Project is not within the City's Local Government Area (LGA), *there will be significant negative 'downstream impacts' on the city because the new harbour crossing provides additional road capacity linking the North Shore with the CBD.*

The WHT Environmental Impact Statement (EIS) states that the cumulative scenario for 2037 (morning peak) will result in up to 13 per cent total unreleased trips despite the additional capacity and improvements. There is subsequently *only a reduction of 4 per cent compared to the 'do minimum' scenario (17 per cent) which demonstrates that the project is not cost effective.*

Traffic demand through the Rozelle area in 2037 is forecast to increase by up to 14 per cent as a result of the WHT Project, with a further eight per cent with the completion of the Beaches Link and Gore Hill Freeway Connection scenario project. This 22 per cent increase in traffic demand is on top of the impacts due to the WestConnex M4-M5 Link Rozelle interchange projects. The City is concerned about this level of additional traffic, concentrated in the Rozelle area, which raises *significant concerns about air quality and traffic noise for residents, many of whom work in the City's LGA*. It also raises important questions about how the NSW Government is progressing a project that is contrary to the core objectives of its *Future Transport 2056* strategy.

In its submission the City *disputes the veracity of the benefits attributed to the WHT Project*, specifically:

1. travel time savings as a result of bypassing the Sydney CBD
2. improved urban amenity as a consequence of moving traffic underground
3. improved public transport
4. improvements to walking and cycling routes

The City also *raises questions about the opportunity costs of the project*. The NSW Government must show why this is the best use of limited government resources, and why these funds are not better invested in public transport infrastructure.

### **What is the NSW Government's motorway strategy?**

The motorway strategy as expressed in the WHT EIS is unclear and raises the following questions:

- if the WHT is a bypass, how will the place that is being bypassed benefit from removing through traffic?
  - In particular, what improvements are planned for Sydney CBD streets as a consequence of traffic being diverted to the WHT?
- which connections are being created, or removed, to ensure that the WHT does in reality create a bypass and is not just an additional road connection between the lower North Shore and the CBD?

Because the current routes into the CBD will remain, and through traffic on the Harbour Bridge and Anzac Bridge is being removed, these routes and the new connection between WHT and Anzac Bridge will increase vehicle volumes on the surface street network in the city. Unless the proponent clearly articulates how it will remove capacity on key motorway connections to the city in order to reduce vehicle flows, the WHT Project will not be adhering to NSW Government transport policy.

### Recommendation

That the NSW Government:

- clarifies how it will manage the road connections to reduce the flow of vehicles into the CBD, specifically:
  - how many additional vehicles are projected along key corridors connecting to the CBD: Anzac Bridge – Western Distributor – Drivitt/Market/King/Harris Wattle?
  - how it will cater for any growth in private vehicles to the CBD as a result of WestConnex and associated projects including the WHT?
  - whether it will take a policy position that queuing in motorway tunnels is not acceptable? And if so, how it will manage motorway traffic to ensure that queues are limited to surface motorway links rather than impacting on the surface street and places surrounding motorway portals, particularly in dense, inner urban places?
  - in view of the projected traffic increases in the area around the St Peters and Rozelle interchanges, what actions it will take to:
    - limit traffic induction
    - reduce speeds
    - prioritise people walking, cycling and travelling in buses on the surface road network in and around the Sydney LGA

### Misaligned project objectives

The CBD environment is accessed overwhelmingly by mass transit (rail) and surface transit (buses) – and people walking to and from these modes of access. If the aim of the WHT is to remove traffic from surface streets and return streets for local transport access, the CBD streets should be refocussed on people walking or cycling which are the most efficient ways of getting around the CBD. The project objective of *“increas(ing) the ability of the harbour CBD and road network to cope with traffic incidents”* misunderstands how any redundant road space should be used. City streets should not be relied on to provide abundant capacity to deal with incidents or serve as a “safety valve” for traffic congestion on the motorway network. This objective is flawed and risks perpetuating the status quo of prioritising vehicle movement over people and places. It is in direct conflict with NSW Government transport policy and international best practice and should be removed. Failing that, the NSW Government agency responsible for developing this objective should provide a clear, evidence-based justification clarifying why it has been included.

All previous experience with motorway enhancement has demonstrated that unless the space “freed” up by removing through traffic is reclaimed for other uses, it will quickly be filled by new traffic and any opportunity for place making will be lost.

If the NSW Government is genuine about making the CBD a better place for the people who use it, and believes that the WHT will free up space for other customers and their needs, then these customers should be considered in the context of place. That is, the

CBD dominant customer group is people who walk – the function of the CBD is not to provide resilience for vehicles.

### Recommendations

That the NSW Government:

- considers people in the context of place to make the CBD a better place for the people who use it
- remove the current project objective of: “*increas(ing) the ability of the harbour CBD and road network to cope with traffic incidents*” as the objective is flawed and risks perpetuating the status quo of prioritising vehicle movement over people and places. It is also in direct conflict with NSW Government transport policy and international best practice
  - provides a clear, evidence-based justification clarifying why it has been included if the abovementioned objective is retained

### Travel time savings from bypassing the CBD (benefit 1)

The NSW Government should clearly articulate how the WHT Project will leverage improvements on the surface (street network and places) that arise through the potential to divert regional through traffic around (and under) the city via WestConnex. Section 3.6 of the EIS ostensibly sets out how the objective of making improvements on the road surface aligns with the government’s strategic planning, policy frameworks and associated priorities. However there is no explanation about how these important surface road improvements and associated travel time savings will actually be achieved.

The underlying assumption that additional road space can reduce travel times is flawed. Urban motorways do not contain congestion but rather induce demand for motor vehicle trips which erodes these savings over time. If the proponent is to make claims such as this, it needs to provide real examples where this has been achieved (and endures) in Sydney and other relevant contexts. To make the claim based on the outputs of a transport modelling process cannot be D-supported especially when the model used (STM) is an unconstrained travel model.

Historical examples of joined up investments that include both bypass and surface road space reallocation are those on Bourke and Crown Streets following the opening of the Eastern Distributor. In contrast, the WestConnex Project has failed to achieve equivalent surface road improvements on Parramatta Road because while some additional traffic has been attracted to the motorway, with no changes being made to the configuration of Parramatta Road, the same level of traffic has remained on the surface network. The same result will apply to the F6 Project as currently proposed because without other changes to road configurations being put in place, surface traffic on the Princes Highway will remain unchanged. As a consequence ‘places’ are not improved because there are no planned street improvements to the ‘places’ along the Princes Highway.

### Recommendations

That the NSW Government:

- clearly articulates how the WHT Project will leverage improvements on the surface (street network and places) that arise through the potential to divert regional through traffic around (and under) the city via WestConnex
- provides enduring examples where additional road space has reduced travel times in Sydney and other comparable contexts

## **Improved urban amenity from bypassing the CBD and moving traffic underground - return local streets to Local Government (benefit 2)**

The WHT EIS does not address how the project will meet the needs of people who walk and bike who also use the corridor. The EIS claims that “a CBD bypass will return streets for local customers” but provides no details about how this will be achieved. Council does not own or control CBD Streets, and cannot make changes to the road environment. The NSW Government must clearly articulate how it will realise these benefits and return local streets to local customers. In the City’s view the NSW Government should give control of CBD streets to local government because councils are best placed to implement the necessary improvements so that these benefits can be realised. Alternatively the City believes that the NSW Government should be obliged to implement treatments that reduce through vehicles and increase place amenity.

Should it be determined that the WHT will proceed, the NSW Government must make a formal commitment to realise the benefits resulting from the significant infrastructure investment it is making in the WHT Project as outlined in the EIS. If road capacity is added to the motorway network without specific action being taken to return streets for local customers, there is no guarantee that surface roads will have less traffic. Post project evaluation – at one year and five year points post completion – is too late. More effective planning with clear measures and targets that show how to improve places off the back of the bypass investment, needs to be undertaken at the beginning of the project to ensure that the right outcomes are achieved. The surface road improvements to streets and town centres should be implemented in parallel with the opening of the motorways so that these benefits can be realised from day one.

The EIS states “Once complete, the upgraded corridor would enable each of the three harbour crossings to perform their intended function”. The City agrees that the role of the Harbour Bridge is to provide a connection to the CBD, but disagrees that this function should continue to focus primarily on motorised vehicle journeys. Access to the city via the Harbour Bridge by train or bus, riding bikes or walking is equally important. The CBD, which has a constrained road network, is identified as a place for people in the NSW Government’s *Future Transport Strategy 2056*. In this context, mass transit and efficient space saving transport modes are the most efficient and effective way to access the city. Transport connections to the CBD need to move more people, not more cars; any additional vehicles funnelled into the city will impact negatively on productivity. Accordingly the NSW Government must commit to removing or re-purposing some or all of the distributor network, including:

- removing/repurposing sections of the western distributor along the west of the city centre
- removing the off-ramps serving Pyrmont and the city centre
- removing/repurposing the Cahill Expressway

### **Recommendations**

That the NSW Government:

- clearly articulates how it will return streets to the local community
- gives control of CBD streets to local government to implement the necessary improvements to return streets to local community
- implements treatments that reduce through vehicles and increases place amenity if it chooses not to give control of CBD streets to local government
- makes a formal commitment to return streets to local customers, should the WHT Project proceed

- undertakes effective planning with clear measures and targets at the beginning of the project that show how it will improve places off the back of the bypass investment
- implements surface road improvements to streets and town centres in parallel with the opening of the WHT so that these benefits can be realised from day one

### ***Reallocate road space on major road access routes within the city***

The City demands that the NSW Government commits to reallocating road space for public transport, walking and cycling on major road access routes within the city, given that WestConnex will enable all necessary trips to access the motorway network further away from the city centre. Current walking facilities along the western, northern and eastern access routes are too narrow and frequently overcrowded and unsafe, while people walking to and from Pymont and Darling Harbour frequently spill over onto the road.

### **Recommendation**

That the NSW Government:

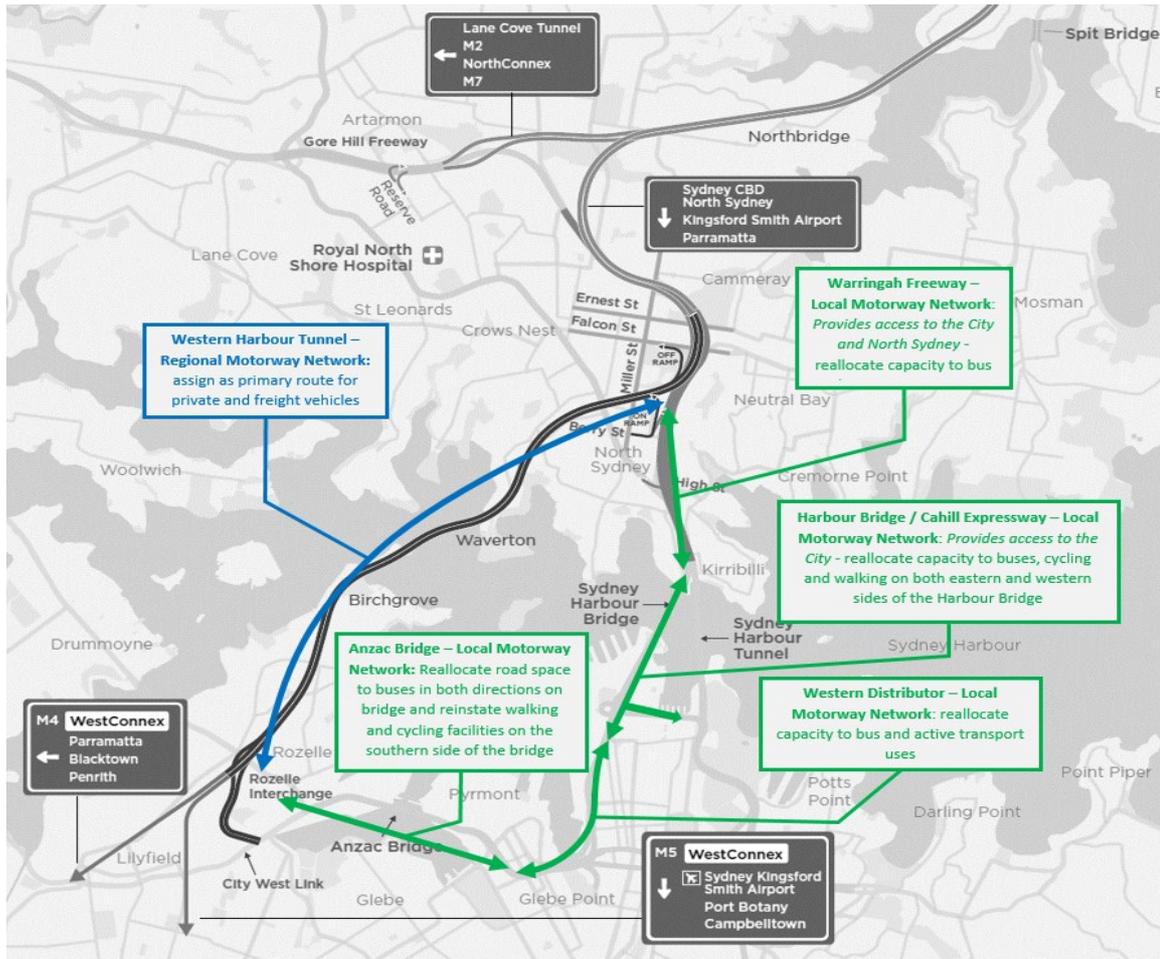
- formally commit to, and provide funding, to reduce road capacity for vehicles and improve streets for people in the City's LGA, including on:
  - Druitt Street, Market Street, King Street accessing the city centre at the west
  - Harris Street, Wattle Street accessing the city centre at the south
  - Bridge Street and Bent Street accessing the city centre at the east

### ***Reallocate road space on major road access routes to and from the city***

The NSW Government must commit to reallocating road space for public transport, walking and cycling on major road access routes to and from the city as they will no longer be required to carry bypass traffic as a result of the construction of WestConnex and the WHT. These include:

- Anzac Bridge
- Sydney Harbour Bridge
- Western Distributor

Map 1 indicates the regional and localised motorway connections following the completion of WHT. It sets out the minimum requirements and commitments for improvements to the localised motorway connections, through the provision of bus and active transport facilities, that the NSW Government must make before it is approved.



**Map 1: Regional and Localised Motorway Network Connections**

### Recommendation

That the NSW Government:

- commit to reallocating road space for public transport, walking and cycling on major road access routes to and from the city (as shown in Map 1) including on:
  - Anzac Bridge
  - Sydney Harbour Bridge
  - Western Distributor

### Improved Public Transport (benefit 3)

Journey to Work mode share for residents and workers in Rozelle and surrounds indicates 52-70 percent private vehicle use. The City notes that a significant mode shift to public transport would help meet the NSW Government's objective of a '30-minute City' much more effectively than the WHT road option. Yet the alternate options analysed as part of the WHT Project do not include options for heavy rail along the WHT alignment to encourage a mode shift from private vehicle to public transport.

In addition to providing alternative non-road public transport options to the private vehicle, the NSW Government must commit to reallocating road space on major road

access routes to and from the City to provide more public transport (e.g. bus lanes in both directions on Anzac Bridge and Sydney Harbour Bridge) to serve the Victoria Road and Inner West corridors.

### Recommendations

That the NSW Government:

- provides alternative public transport options such as rail on the WHT alignment
- commits to reallocating road space on major road access routes to and from the City, to prioritise the movement of public transport over private vehicles to serve the Victoria Road and Inner West corridors, consistent with NSW Government Policy

### Improvements to walking/cycling routes (benefit 4)

The NSW Government should commit to reallocating road space on Anzac Bridge, Sydney Harbour Bridge and the Western Distributor to provide:

- additional space for people riding and walking between the North Shore and the city or Inner West. The current bike connections across the Harbour Bridge is substandard, with cyclists having to walk (with their bikes) up 42 stairs to access a path that is only slightly more than 2m wide, providing a route for customers moving in both directions. More than 2,000 people use this route in the AM and PM peak so by providing space for traffic underground, the bridge deck can accommodate a dedicated separated cycleway in each direction
- a dedicated space for walking on both sides of the Harbour Bridge returning the walkways to their original use – providing a connection for people walking on the northern and southern sides of the bridge
- for the reinstatement of the walking and cycling route on the southern side of the Anzac Bridge which was removed in 2005 when the bridge was widened for additional capacity

The City notes that the WHT EIS assessment of impacts to active transport users during construction do not incorporate the WestConnex M4-M5 Link Rozelle interchange works, particularly the removal of shared user paths across Victoria Road and The Crescent. There must be good coordination between WestConnex and the WHT Project, if it proceeds, to ensure that safe and accessible arrangements are put in place for active transport users during the construction period.

### Recommendations

That the NSW Government:

- commits to reallocating road space on Anzac Bridge, Sydney Harbour Bridge and the Western Distributor to provide:
  - additional space for people riding and walking between the North Shore and the city or the Inner West
  - a dedicated space for walking on both sides of the Harbour Bridge
  - for the reinstatement of the walking and cycling route on the southern side of the Anzac Bridge
- puts in place effective coordination procedures between WestConnex and the WHT Project, if it proceeds, to ensure that safe and accessible arrangements are put in place for active transport users during the construction period

## **Governance - the future of collaboration and co-design**

The City is aware that the NSW Government and North Sydney Council worked collaboratively on a plan for the North Sydney CBD over several years as part of the development of the *WHT and North Sydney Metro* Project. The results of this collaboration have however been either completely overlooked or misrepresented in the EIS. For example, additional vehicle lanes have been added to Berry Street, and clearways have been introduced in the city centre which is at odds with what the two parties discussed, and the City is very concerned that TfNSW disregarded North Sydney Council's input in this way.

The City works with the NSW Government in good faith on numerous transport related projects and such disregard for due process and collaboration seriously undermines this partnership approach and places these relationships in jeopardy. The City accordingly seeks clarification about what governance arrangements the NSW Government is putting in place to ensure that proponents for projects such as WHT are obliged to take direction from key stakeholders (both internal, that is state government, and external) on initiatives that improve places, even though they may be at the expense of motorised transport.

### **Recommendation**

That the NSW Government:

- ensures that proponents for transport projects, including the WHT Project, take direction from key stakeholders (both internal and external) on initiatives that improve places, even though they may be at the expense of motorised transport

## **Opportunity cost of investing in motorways instead of public transport**

The City opposes the NSW Government's investment in a north-western bypass that prioritises cars. The City is particularly concerned about the opportunity cost of investing in motorways at the expense of public transport projects which have well known benefits. This includes the expansion of the metro network to include a station at Pyrmont as well as Zetland, which the NSW government has acknowledged needs to be built by 2030 for economic and social reasons.

### **Recommendation**

That the NSW Government:

- invest in public transport projects which have well known benefits, such as the expansion of the metro network, rather than the WHT Project which encourages private vehicle use

## Conclusion

The City opposes the WHT Project because this costly motorway project will fail in its primary objectives of easing congestion and creating travel time savings.

The City believes that the key to unlocking any benefits from WestConnex will be the development of a road network logic that focusses on:

- creating a bypass for traffic around (or under) the city via the motorway network
- prioritising and improving access
  - by public transport
  - for people walking and riding to the city
- reallocating road space to public transport, walking and cycling

The City is concerned that there is an undisclosed high opportunity cost with the WHT Project preventing the allocation of funding to other important projects that have greater benefits for all transport users, not just motor vehicle customers. The City does not understand why funding is being provided for motorways when there are important unfunded public transport projects for example an extension of metro to Zetland.

In the City's view, changes to the surface road network (as described in the City's submission, see Map 1) must form an integral part of the overall WestConnex Project and associated projects including the WHT.

The current approach that has been applied in relation to WestConnex of 'wait five years after completion to determine what changes to the surface road network are required' is unacceptable. Better planning is needed to realise the stated benefits of WestConnex and associated projects such as WHT from day one. The City demands that the NSW Government make a commitment to implementing the necessary works required in order to realise the benefits outlined in the WHT EIS, and sets out how it will do this.

The City is concerned that we are repeating points in this submission that we have included in our previous submissions on WestConnex and related transport projects, yet we note that our previous comments have largely been ignored. We continue to be frustrated that the NSW Government has failed to consider our evidence based feedback. There have been no meaningful changes reflecting the City's major concerns, to any of these projects. When considering investments in the harbour crossing corridor, the City insists that a whole of corridor approach be taken which considers improvements and changes to the existing network.

### Recommendations

That the NSW Government:

- reduce the volumes of private vehicles and discretionary vehicles from the motorway network travelling to, from and through the city
- reallocate road space within the city centre to people walking and riding, to improve the efficiency of constrained road space as the city continues to grow
- reallocate road space within the city centre from vehicles to 'places for people' to improve the quality of the urban environment