

WestConnex Stage 3 – Pre-Opening Performance Plan.

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1. Introduction

1.1 Purpose of this Submission

This document provides the City of Sydney ('the City') submission on Transport for NSW ('TfNSW') *WestConnex Stage 3 Road Network Performance Plan – September 2023* ("Draft Stage 3 Pre-Opening Plan").

1.2 Scope of this Submission

The Scope of the City's submission has been limited to the Draft Stage 3 Pre-Opening Plan document. The City has only considered the impacts of the WestConnex Motorway within its boundaries. The City's submission does not cover the impacts of the WestConnex motorway on streets or intersections outside the LGA, although it acknowledges these are significant.

The City has requested the following information from TfNSW in order to prepare its submission:

- Strategic Motorway Project Model (SMPM) reports discussed on page 21, and the vehicle growth assumptions specifically in Pyrmont and the CBD
- The local area strategies and plans considered as part of the Movement and Place analysis, not documented and mentioned on page 21, as at the time of writing these were only Councils Strategic planning documents.
- The assessed road safety performance of the network – to be provided, this was provided 2 days before submissions closed. The City has not reviewed the amended draft document.
- The LoS for other modes, including buses or people walking. Delays for pedestrians at intersections ought to be modelled so that these can be compared post-opening. – TfNSW confirm this was not assessed.
- The base line data for 2022 – so that we can compare *actual* performance with the modelled predicted EIS performance for 2023 - this has been provided.

TfNSW has provided some information (indicated above).

TfNSW evaluation frameworks:

The submission references the following performance framework/guideline documents:

- Movement and Place: The "cross-government framework for planning, designing and managing our transport networks to maximise benefits for the people and places they serve." (TfNSW website)

1.3 Background

1.1.1. Stage 3 WestConnex consent conditions requirements

TfNSW prepared the Stage 3 Pre-opening Plan to address Condition E63, which forms part of the EIS Conditions of Approval (CoA) for the Project and states the following:

Condition E63:

“Prior to the commencement of operation of the full CSSI (mainline tunnel and Rozelle Interchange), the Proponent must prepare a Road Network Performance Plan in consultation with Transport for NSW and the relevant council(s). The Plan should incorporate operational traffic modelling results from the M4 East and New M5 (SSI 6307 and SSI 6788) projects, and include:

- a) consideration of movement and place analysis and local initiatives, such as local area improvement strategies and potential land use changes, and any traffic changes as a result of other major road projects within the project area;*
- b) an updated analysis, including modelling of traffic impacts to the adjoining road network (including impacts on local roads from rat-running), as a consequence of the CSSI;*
- c) an assessment of the performance of the road network, including potential ‘pinch-points’ where the merging of tunnel exit traffic and surface traffic would occur at the Haberfield Interchange, the St Peters Interchange and Rozelle Interchange and Iron Cove Link; and*
- d) mitigation measures to manage predicted traffic performance impacts including local area traffic management and bus priority measures as relevant. The Road Network Performance Plan must be submitted to the Secretary and relevant council(s). The implementation of the Plan must have commenced prior to the full operation of the CSSI. The Proponent is responsible for the implementation of the identified measures under Condition E63(d).*

Note: Identified mitigation measures may need to be further assessed under the Environmental Planning and Assessment Act, 1979. Works will need to meet relevant design standards and be subject to independent road safety audits.”

2. Key Issues and requirements

2.1. TfNSW does not adequately respond to the Consent Conditions

The Draft Stage 3 Pre-Opening Plan does not respond to the consent conditions. The City disputes that TfNSW has consulted, or assessed the performance of the network, and have only developed mitigation measures to respond to Motorway performance. Further, TfNSW have not proposed any measures that will mitigate impacts on the local network.

The Draft Stage 3 Pre-Opening Plan contains no new place making initiatives despite identifying numerous new intersections requiring modification e.g. Harris Street. New mitigation measures (those not discussed in the EIS phase) are designed to improve the performance of the motorway network at the expense of local places, jobs and housing.

Requirement: The Draft Stage 3 Pre-Opening Plan must adequately address the consent conditions

Key issues are outlined below.

Consent Condition	City feedback - Draft Stage 3 Pre-opening Plan
<p><i>Prior to the commencement of operation of the full CSSI (mainline tunnel and Rozelle Interchange), the Proponent must prepare a Road Network Performance Plan in consultation with Transport for NSW and the relevant council(s). The Plan should incorporate operational traffic modelling results from the M4 East and New M5 (SSI 6307 and SSI 6788) projects, and include</i></p>	<ul style="list-style-type: none"> TfNSW did not consult the City in the development of the Draft plan The City has had no contact with TfNSW about the preparation of the Draft Stage 3 Pre-Opening Plan. The City was first made aware of the Plan on 31 August 2023. The City learned via the Draft Stage 3 Pre-Opening Plan that the Sydney Gateway project promised in M8 EIA in 2017 will not <i>commence construction</i> until Q2 2024, more than 5 years after the M8 project has opened.
<p><i>a) consideration of movement and place analysis and local initiatives, such as local area improvement strategies and potential land use changes, and any traffic changes as a result of other major road projects within the project area;</i></p>	<ul style="list-style-type: none"> TfNSW has not provided any analysis supporting the use of a movement and place approach TfNSW have not identified any local initiatives or improvement strategies and potential land use changes as discussed in the Draft plan TfNSW have not identified the impacts of Metro on place, land use and traffic – despite two new metro rail networks directly intersecting in the inner City
<p><i>b) an updated analysis, including modelling of traffic impacts to the</i></p>	<ul style="list-style-type: none"> City acknowledges that while TfNSW included the outputs of modelling analysis, these are of very

Consent Condition	City feedback - Draft Stage 3 Pre-opening Plan
<p><i>adjoining road network (including impacts on local roads from rat-running), as a consequence of the CSSI;</i></p>	<p>limited relevance as TfNSW failed to provide key associated information, including: :</p> <ul style="list-style-type: none"> • Key modelling assumptions • vehicle traffic growth rates • details of differences between scenario 1 and scenario 2 • an overall assessment of vehicle growth to compare to the 2015 EIS predicted vehicle volumes in 2023 • validation of the 2015 EIS total vehicle growth rate of 10%
<p><i>c) an assessment of the performance of the road network, including potential 'pinch-points' where the merging of tunnel exit traffic and surface traffic would occur at the Haberfield Interchange, the St Peters Interchange and Rozelle Interchange and Iron Cove Link; and</i></p>	<ul style="list-style-type: none"> • TfNSW did not adequately assess the performance of the current road network. The Plan contains: <ul style="list-style-type: none"> • no road safety performance data • no actual vehicle data (only modelled outputs) • no performance data for people walking, cycling or catching public transport • analysis of delays at only select intersections • no assessment of performance of alternate routes / bypass corridors e.g. Parramatta Road or Broadway, Harris Street (to quantify whether WestConnex is serving its purpose)
<p><i>d) mitigation measures to manage predicted traffic performance impacts including local area traffic management and bus priority measures as relevant.</i></p> <p><i>The Road Network Performance Plan must be submitted to the Secretary and relevant council(s). The implementation of the Plan must have commenced prior to the full operation of the CSSI. The Proponent is responsible for the implementation of the identified measures under Condition E63(d).</i></p>	<ul style="list-style-type: none"> • TfNSW has not been transparent about the development of mitigation measures, which: <ul style="list-style-type: none"> • prioritised implementation and funding for measures to improve the efficiency of Motorway and key intersections to reduce delays to cars, • failed to identify any new measures that enhance place e.g. Broadway improvements, and those previously identified such as Sydney Park Junction have not been implemented and are being descoped and place making elements removed. • In the Plan, TfNSW continue to prioritise cars above people and places in the areas impacted by WestConnex. TfNSW has not implemented any of the identified place making initiatives. • In relation to the Rozelle interchange and its impacts on the Western Distributor the City disputes the use of Harris Street as a mitigation

Consent Condition

City feedback - Draft Stage 3 Pre-opening Plan

measure to improve the performance of the Motorway.

- Local Streets in dense urban areas should not be used to improve Motorway performance.

Because of the major and concerning shortcomings of its Draft Stage 3 Pre-Opening Plan, TfNSW must commission an independent review of the pre-opening plan.

The objectives of the independent review should largely reflect those in Conditions of Consent E63, as drafted below:

Requirement: TfNSW must undertake an independent review of The Draft Stage 3 Pre-Opening Plan.(Discussed below)

Draft Objectives of the Independent review:

The objectives of the review should ensure the Pre -opening Road Network Performance Plan includes

a) an assessment of the performance of the road network for all road users – including people walking, riding and catching public transport. This includes where pinch points affect these road users where the merging of tunnel exit traffic and surface traffic occur - at the Haberfield Interchange, the St Peters Interchange and Rozelle Interchange, Pymont off ramps and Iron Cove Link; and

b) mitigation measures to manage place impacts including local area traffic management, reallocation of road space to create more room for people to walk, ride and for bus priority measures. Specifically mitigation measures must reduce vehicles impacts on Harris Street, Pymont Bridge Road in Pymont and Victoria Road at Rozelle. The Road Network Performance Plan must be submitted to the Secretary and relevant council(s) . The implementation of the Plan must have commenced prior to the full operation of the CSSI. The Proponent is responsible for the implementation of the identified measures under Condition E63(d).

c) alignment with the following strategies :

- TfNSW Future Transport Strategy
 - TfNSW Movement and Place framework including the TfNSW Road User Space allocation Policy
- TfNSW 2026 Road Safety Action Plan
- TfNSW Active Transport Strategy
- TfNSW South East Transport Study
- TfNSW Tech Central Place Based Transport Strategy

and other relevant local strategies such as

- Pymont Place Strategy,
- City of Sydney Local Strategic Planning Strategy

Independent reviewers:

There should be three independent reviewers with expertise in 1) urban planning, urban landscaping or architecture, 2) engineering and 3) strategic land use planning

Submissions and consultation

Affected stakeholder groups including local Councils will be interviewed about the plan, its impacts and mitigation measures.

Review Recommendations for Chief Transport Planner

The Independent review recommendations will be considered and implemented by the Chief Transport Planner.

2.2. TfNSW methodology and targets are not consistent with Government Policy, lack transparency and are not fit for purpose

The TfNSW approach to the Draft Stage 3 Pre-opening Plan is not consistent with key NSW Government policies and strategies including:

- TfNSW Future Transport Strategy
- TfNSW 2026 Road Safety Action Plan
- TfNSW Movement and Place framework including the TfNSW Road User Space allocation Policy
- TfNSW Active Transport Strategy
- TfNSW South East Transport Study
- TfNSW Tech Central Place Based Transport Strategy

The Draft Stage 3 Pre-opening Plan (including its mitigation measures) undermines the vision and objectives that the NSW Government has publicly adopted in a number of recent strategies and plans.

It erodes confidence in the value of the NSW Government's strategic planning. TfNSW is required to follow and embed NSW Government Policy into its work, especially when the project is located in a dense, inner city location.

Requirement: The Draft Stage 3 Pre-Opening Plan must demonstrate strategic alignment with Government Policy and Strategies

These are outlined below:

2.2.1. Draft Stage 3 Pre-opening Plan review goes contrary to Future Transport

Future Transport is NSW Government policy is with an objective of "Maximising the use of our network, [by] releasing the potential of our infrastructure We will focus on getting more out of our existing investments, by reallocating road space to more efficient modes of transport like buses, walking, cycling and micromobility devices".

The Draft Stage 3 Pre-Opening Plan methodology is not consistent with Future Transport. Action E.2.2 "Stabilise Greater Sydney's traffic". The Draft Stage 3 Pre-Opening Plan does not describe how their modelling assumptions are consistent with Future Transport.

2.2.2. Draft Stage 3 Pre-opening Plan review goes contrary to Movement and Place

The Draft Stage 3 Pre-opening Plan methodology is not consistent with the NSW Government Movement and Place policy and provides insufficient assessment of movement and place outcomes.

It references the Movement and Place methodology but does not discuss how the Movement and Place framework was applied to the Plan in assessing the performance of the current road network, or in developing mitigation measures. Government policy says network, land use and all transport users should be considered in a Movement and Place assessment.

“ The aim of ..(understanding movement).. is to understand how transport networks are integrated with land use and public space within the study area, and how they serve different users’ needs... Consideration of a range of options for improving transport networks is a necessary part of any movement assessment.... movement links need to consider whether existing infrastructure could be reused, repurposed or used by a different mode... In all scenarios, understanding the service required of all potential modes of transport is crucial.”
(TfNSW Movement and Place website 2023)

The Movement and Place Framework considers **all road users**.

The NSW Road User Allocation “Policy applies to the entirety of the public road reserve from boundary to boundary on proposed and existing classified roads in built up areas in regional and metropolitan NSW” (TfNSW 2019) says:

*“When allocating road user space based on the network vision and road functions, **consider all road users** in order of: walking (including equitable access for people of all abilities); cycling (including larger legal micro-mobility devices); public transport; freight and deliveries; and point to point transport ahead of general traffic and on-street parking for private motorised vehicles”*

The Draft Stage 3 Pre-Opening Plan only discusses vehicle performance, performance for people walking, riding and catching public transport are not discussed. The only measures quantified are delays to vehicles at specific intersections, no other users (e.g. people walking) or their performance are discussed.

2.2.3. Draft Stage 3 Pre-opening Plan review goes contrary to Road User Space Allocation Policy

The TfNSW Road User Space allocation Policy has the Objective – “to understand how transport networks are integrated with land use and public space within the study area, and how they serve different users’ needs”.

The Draft Plan fails to embed this policy in its approach, analysis and recommendations.

2.2.4. Draft Stage 3 Pre-opening Plan fails to embed TfNSW 2026 Road Safety Action Plan:

TfNSW 2026 Road Safety Action Plan: Vision aims for “Zero fatalities and serious injuries by 2050”. Target “Halving fatalities on NSW roads by 2030” and “Reducing serious injuries by 30% on NSW roads by 2030”.

The Draft Plan fails to adequately embed this vision in its approach, analysis and recommendations.

2.2.5. Draft Stage 3 Pre-opening Plan fails to embed TfNSW Active Transport Strategy

The TfNSW Active Transport Strategy has the Objectives to – “Enable 15 minute neighbourhoods” and “Deliver connected and continuous cycling networks”

The Draft Plan fails to adequately embed this vision in its approach, analysis and recommendations.

2.3. Draft Stage 3 Pre-opening Plan review is not consistent with key NSW Government land use plans and strategies

The NSW Government’s strategic vision for the Pyrmont Peninsula is articulated as an emerging Innovation Corridor that is part of a strong and competitive Harbour CBD in the Eastern Economic Corridor in the *Greater Sydney Region Plan - A Metropolis of Three Cities* (the Region Plan). Both the Region Plan and the supporting *Eastern City District Plan* (the District Plan) recognise the importance of collaboration, liveability and sustainability and the importance of place-based planning that aligns infrastructure with growth. (These same themes underpin the recent Six Cities Region Discussion Paper.)

Along with the Region Plan and the District Plan, the GCC’s Review and subsequent *Pyrmont Peninsula Place Strategy* and supporting *Pyrmont Peninsula Place-based Transport Strategy* provide the overall framework for planning in Pyrmont and Tech Central (as articulated in the *Camperdown Ultimo Collaboration Area Place Strategy* (‘Tech Central’)). The Draft Stage 3 Pre-opening Plan runs contrary to all these adopted NSW Government policy and strategy.

Requirement: Draft Stage 3 Pre-Opening Plan must align to local initiatives, plans and local area improvement strategies and any traffic changes as a result of other major road projects

2.3.1. Draft Stage 3 Pre-opening Plan will funnel traffic onto local streets and threatens Tech Central and Central Precinct – key innovations areas.

Traffic increases caused by the changes to the Allen Street off-ramp, and Bridge Road right turn ban will find their way to Broadway and impact on the NSW Government’s *Tech Central* and recently exhibited *Central Precinct*. Better place outcomes on Broadway are crucial to optimising the value of both these innovation precincts.

2.3.2. Draft Stage 3 Pre-opening Plan conflicts with findings of Greater Sydney Commission Review, 2019

In August 2019, the then Minister for Planning and Public Spaces, Mr Rob Stokes MP, requested the Greater Sydney Commission, now the Greater Cities Commission (GCC) to undertake an independent review of projects and planning for the Pyrmont Peninsula.

GCC finding	How it conflicts with the Draft Stage 3 Pre-opening Plan
Finding 2: The current planning framework promotes a project-based approach over a place-based approach to planning outcomes	TfNSW perpetuates the status-quo of a project-based approach. It is a stand-alone project which has been developed in isolation without consideration of place-based plans, including transport plans, for the peninsula.
Finding 4: The quality of place is impacted by regional traffic corridors, including cross regional traffic and freight	TfNSW will cause further deterioration in the quality of place by reinforcing regional traffic corridors and increasing lanes on roads connected to the Western Distributor.
The Review noted that the Western Harbour Tunnel (WHT) project is “anticipated to... tak[e] pressure off the Anzac Bridge and Western Distributor , in turn reducing congestion on feeder routes such as Wattle Street, Harris Street and Pyrmont Bridge Road.”	TfNSW undermines the WHT project. The Draft Stage 3 Pre-Opening Plan completely fails to acknowledge the benefit the WHT will have on the Western Distributor.

Draft Stage 3 Pre-opening Plan conflicts with Pymont Peninsula Place Strategy (PPPS), December 2020

The Pymont Peninsula Place Strategy was prepared by DPE in response to the GCC’s 2019 Review and was adopted by NSW Government in December 2020.

PPPS Direction	How TfNSW Mitigation measures conflicts with the PPPS Direction
<p>The Sub-Precinct Masterplan for Harris Street describes it as a local high street and ‘the historic urban spine of the Peninsula’ and includes actions to:</p> <ul style="list-style-type: none"> • investigate the reduction in traffic lanes • widen footpaths • calm traffic • rationalise bus stops • provide new pedestrian crossings 	<p>Banning the right turn from the Western Distributor onto Pymont Bridge Road and adding an additional lane on the off-ramp brings more traffic into the heart of Pymont and reinforces the role of Harris St as a feeder to the motorway. This compromises the vision of a vibrant, historic street.</p> <p>Far from providing new pedestrian crossings as per the PPPS finding, the TfNSW actually reduces the number of crossings.</p>
<p>One of the 10 key directions from the PPPS is Direction 7 - Making it easier to move around. It notes that <i>“walking and cycling [are] the preferred mode for local trips, including by creating better connectivity, making it easier to cross busy roads...”</i></p>	<p>TfNSW makes it more difficult to walk and cycle around the area by physically removing a crossing on Harris Street, by downgrading pedestrian priority across the Pymont Bridge Road off ramp. It encourages more traffic onto streets that already cause severance issues, namely Pymont Bridge Road and Harris Street.</p>

The Draft Stage 3 Pre-Opening Plan does consider other major projects and associated traffic impacts such as:

- Western Harbour Tunnel project
- Metro West – Parramatta to Hunter Street

2.4. Draft Stage 3 Pre-opening Plan relies on flawed traffic modelling assumptions and assessments

Requirement: The Draft Stage 3 Pre-Opening Plan must immediately release the traffic modelling reports used to inform and justify the plan. Further, TfNSW must provide evidence that the strategic modelling used to inform the plan are fit for purpose and are being applied in accordance with NSW Government policy.

2.4.1. Draft Stage 3 Pre-Opening Plan methodology relies heavily on the Strategic Motorway Project Model (SMPM) model, which TfNSW keeps secret, providing no transparency or scrutiny

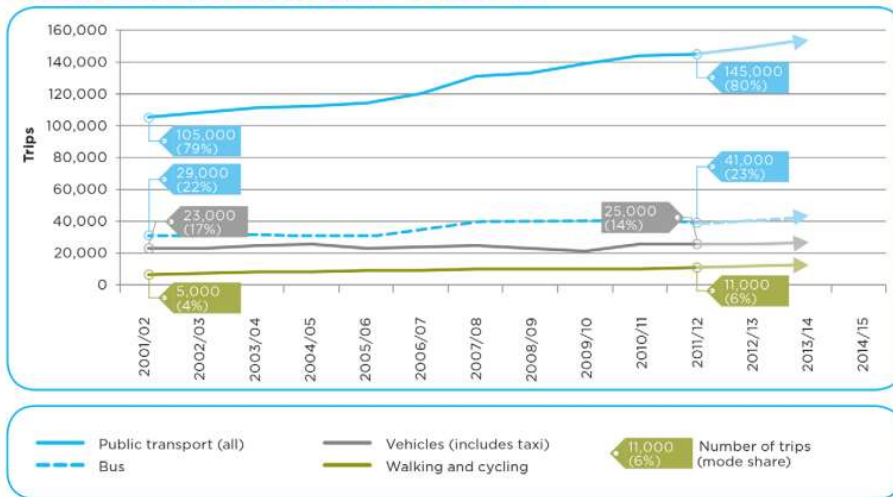
TfNSW continues to argue that they need to *provide* for increased in vehicle traffic accessing the Sydney City Centre and Pymont because of the planned development in these precincts – because that is what their Strategic Model *predicts*. Traffic models should assume zero background vehicle growth in the City of Sydney LGA.

WestConnex Stage 3 – Pre-Opening Performance Plan.

The NSW Government's *Sydney City Centre Access Strategy* showed that between 2001 and 2014 (a period of unsurpassed development), the number of vehicles accessing the City Centre plateaued, with growth in travel demand being served by public transport, walking and cycling.

Since George Street was closed for light rail, TfNSW reports that driving to the City Centre has actually decreased by 15-18%. Modified working arrangements following Covid shutdowns have continued these trends of reduced driving.

Trends in travel to the Sydney City Centre - AM peak 1 hour



TfNSW insists on keeping the modelling, and modelling inputs / outputs supporting the plan secret. This deprives taxpayers of transparency of the assumptions justifying the planned road augmentations.

TfNSW fails to undertake the necessary critical assessment of its massive (and expensive) modelling program to justify its validity.

Requirement: The Draft Stage 3 Pre-Opening Plan must provide the following key information supporting the modelling process and outcomes that informed the plan:

- Evidence of how 'mitigation' measures will stabilise traffic into/out of City Centre and Pymont.
- Modelling reports/outputs and assumptions used to inform and justify the Plan.
- Evidence that the adopted strategic modelling process is fit for purpose, by showing evidence of other inner-city locations where it was used to project future traffic volumes for projects – and what the traffic volumes were in reality. (e.g. Alexandria to Moore Park connector 'without project' projections).
- Explanation of how TfNSW accounts for key attributes of strategic modelling process:
 - Model is unconstrained
 - Model does not adequately address modes other than driving such as public transport
 - Model does not adequately account for travel choices (e.g. remode, retime, rethink, reroute)

2.4.2. Draft Stage 3 Pre-Opening Plan methodology relies on the Strategic Motorway Project Model (SMPM) model and does not discuss redistribution of vehicles from toll avoidance

TfNSW applied the debunked "predict and provide" approach to traffic modelling contrary to its Movement and Place Framework (which favours a "Vision and Validate" approach).

TfNSW uses a modelling methodology that is not fit for purpose for assessing the impact of changes to a motorway interface on the surface roads adjacent to the off-ramps

“The land use forecasts and assumptions were considered using the standard land use projections for year 2023. These land use projections were considered in the Strategic Motorway Project Model (SMPM) model, which has been used to derive the future traffic demand for the intersections” (page 21)

“The Stage 3 post opening intersection performance forecasted in the EIS has been compared with Scenario 1. The intersection was expected to operate better in the AM and PM peak in the updated Scenario 1 modelling compared to the EIS modelling, due to less demand in the SMPM strategic models than in the EIS WestConnex Road Traffic Model (WRTM) strategic models.” Page 27

Vision and validate is NSW Government policy – see Future Transport p115 “Vision-led planning and delivery”.

- The SMPM is an unconstrained strategic level toll assignment model for assessing traffic volumes on the motorway network. It does not provide fit-for-purpose outputs for assessing traffic growth in a precinct such as Pyrmont / Ultimo.
- TfNSW has not calibrated their model as required in the TfNSW Motorway Design Guide – Capacity and flow analysis (RMS, 2017): *“The major assumptions in a model relate to population and employment patterns, future land use, mode choice, travel behaviour, and characteristics of the transport infrastructure. Therefore, the traffic estimates will change with any changes to the underlying assumptions.”* While TfNSW have calibrated their model to account for COVID and new working from home arrangements, *there has been no calibration to account for Metro West.*

“The improvement in the PM model is due to a decrease in traffic demand from a difference between WRTM strategic model and most current SMPM strategic model factoring in post COVID-19 travel patterns (including work from home and peak spreading).” Page 28

2.4.3. TfNSW assumptions for background traffic growth on Anzac Bridge/Western Distributor are selective and lack any transparency

The whole premise of the Draft Stage 3 Pre-Opening Plan is to provide for increased vehicle traffic demand. However, motorway expansion projects across the world have shown that providing additional capacity to meet projected demand actually induces demand. Publicly available traffic data showing slower growth over the longer term suggests that the Anzac Bridge is at or close to capacity. This capacity constraint is likely regulating the number of trips into Pyrmont. Increasing capacity of off ramps unlocks latent demand and *actually induces additional traffic, this is inconsistent with Future Transport Action E.2.2 “Stabilise Greater Sydney’s traffic”*.

The City has requested access to the SMPM assumptions and growth forecasts, TfNSW have refused to provide this information to the City or any other stakeholders.

2.5. TfNSW Movement and Place initiatives are “greenwashing” and achieve minimal benefit for places, people walking and riding

The Draft Stage 3 Pre-Opening Plan says

“Movement and Place opportunities have been considered in the projects listed below and detailed in Table E-3”

In the table below, the City provides a rapid assessment of the benefits of the ‘mitigation measures’ outlined on Page 9 of the Plan under the heading of “Movement and Place”.

Overwhelmingly, the TfNSW “Movement and Place” opportunities deliver benefits for drivers and provide minimal or no benefits for people or place. TfNSW’s self-assessment of their own project

appear to be self-serving and risk ‘greenwashing’ their prioritisation the convenience of drivers at the expense of people and places.

Requirement: The Draft Stage 3 Pre-Opening Plan must remove any misleading assertions regarding the movement and place benefits of the project.

Location	Drivers	People walking	People riding	Place	Impacts by user group
Sydney Park Junction	-	-	✓	-	<ul style="list-style-type: none"> • Pedestrians - No new crossings of Princes Highway • Places - Wider footpaths on one side • Drivers - Speed reduction • <i>Missed opportunity to provide place benefits. TfNSW have descoped project to reduce costs</i>
Frederick Street	-	✗	✗	✗	<ul style="list-style-type: none"> • Pedestrians - Speed reduction 60km/hr to 50km/hr. Likelihood of death for pedestrian car crash is 90%. (10% reduction)
Airport West	✓	-	✓	✗	<ul style="list-style-type: none"> • Drivers – Traffic capacity increased, lanes widened • Bikes - Bike lane implemented • Pedestrians - One new crossing – minimum standard
Airport East	✓	-	-	✗	<ul style="list-style-type: none"> • Drivers– Increased capacity and priority • Pedestrians – Upgraded footpath – minimum standard, reinstate a crossing • Bikes – shared path – minimum standard
Airport North	✓	-	✗	✗	<ul style="list-style-type: none"> • Drivers – Increased capacity and priority • Pedestrians – Upgraded footpath – minimum standard
Victoria Road Bus lanes	✓	-	✗	✗	<ul style="list-style-type: none"> • Drivers – more capacity underground – Iron Cove zipper • Bus – shift bus lane away from kerb. Express buses not underground in zipper. • Pedestrian – minimum benefits – same noise, same volume of buses

2.6. City does not support the mitigation measures at Allen Street off-ramp, expanding the intersection will increase traffic and impact on safety and place

The City does not support the Draft Stage 3 Pre-Opening Plan Mitigation (Page 12) - changes to Allen Street intersection at Harris Street implemented. The City notes that the removal of the Bridge Road right turn ban at Western Distributor off ramps in Pyrmont increases the traffic being funnelled through Pyrmont along Harris Street. *The right turn ban is not identified in the Draft Stage 3 Pre-Opening Plan.* This appears to be a deliberate tactic by TfNSW to conceal traffic impacts created by the privately operated WestConnex motorway.

Requirement: The Draft Stage 3 Pre-Opening Plan must address the impacts that the Allen Street off-ramp will have on the future people walking and cycling and the quality of places in Pyrmont.

2.6.1. Allen St & Harris St Intersection impacts are only assessed as delays to vehicles, there is insufficient assessment of people walking, riding or places.

The Allen St & Harris St Intersection 'mitigation' removes a pedestrian crossing and prioritises the movement of vehicles on Harris Street – Pyrmont's main street.

The mitigation measures that TfNSW is proposing will increase severance for people walking and cycling and places them at higher risk vehicle crash injury risk. These changes will increase the volume and the speed of traffic in Pyrmont-Ultimo. In addition, measures are being designed to accommodate access for 19m and 26m B-double on off-ramps, again increasing risks for people walking and cycling.

2.7. TfNSW are jeopardizing Governments plan for more jobs and housing close to the Pyrmont Metro station

Draft Stage 3 Pre-Opening Plan Mitigation (Page 12) changes at Allen Street and Bridge Road undermines jobs and housing rezoning opportunities in Pyrmont created by the new Metro Station by funnelling more traffic through the peninsula.

In addition, TfNSW are undermining efforts to develop collaborative working relationships with Local Government, Community and other place partners and the value of strategic planning by relying on outdated and flawed modelling that is not fit for purpose.

The Pyrmont Peninsula Place Strategy (NSW Government policy) provides a 20-year plan for future growth in the peninsula, with up to 23,000 more jobs and up to 4,000 new homes. Prioritising motorway traffic through the peninsular undermines the City's ability to unlock development and win community support, putting at risk the special contributions scheme that aims to deliver up to \$280 million to help pay for the new Pyrmont Metro station.

The Community have agreed to additional density (and development) in Pyrmont (as per the PPPS), conditional on better public transport and less traffic on local streets.

The Draft Stage 3 Pre-Opening Plan Mitigation (Page 12) changes at Allen Street and Bridge Road put community acceptance of proposed land use changes at risk. Further, the City's experience working with the development industry is that they see considerable risk investing in new locations where place benefits are undermined by excessive traffic. TfNSW risk reducing vital private sector investment in new residential and commercial development.

Requirement: The Draft Stage 3 Pre-Opening Plan must address the impacts that the Allen Street off-ramp will have on the future development of Pyrmont

2.7.1. Allen Street off-ramp 'mitigation' will impact and reduce the economic potential for Pyrmont from Metro West - Pyrmont Station are not addressed.

The proposed changes at Allen Street and Bridge Road will prioritise and increase motorway traffic travelling into Pyrmont, Broadway and the Sydney city centre. This will directly impact the value and viability of future growth envisaged by the NSW Government in the *Central Sydney Planning Strategy*, *Pyrmont Place Strategy* and *Camperdown Ultimo Collaboration Area Place Strategy* (Tech Central).

2.8. TfNSW has not included critical mitigation measures consistent with Government policy, vision and strategy

2.8.1. TfNSW must deliver identified measures to reallocate space for people, tactical measures on Broadway must be implemented now, while they implement permanent design

TfNSW Tech Central Place-based Transport Strategy identifies improvements to walking and place on Broadway as a time sensitive road space reallocation opportunity. WestConnex public collateral materials reinforce this reallocation, stating traffic volumes on Broadway will drop by 50%.

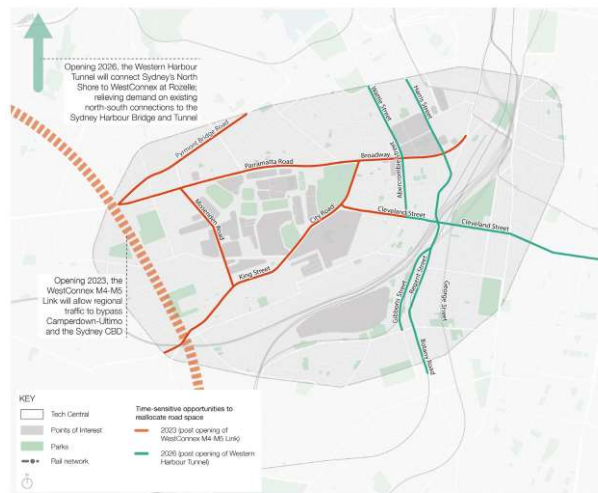


Figure 13 Investment in major transport infrastructure presents opportunities to reduce traffic speed and reallocate road space for walking and cycling

The Draft Stage 3 Pre-opening Plan Mitigation measures fail to identify Broadway as part of their suit of measures, ignoring TfNSW own planning framework. The City has worked with TfNSW to develop a proposal.

TfNSW should provide funding for reallocation of road space on Broadway firstly, to implement a tactical solution and secondly, the permanent solution. This Mitigation measure should be part of the suit of mitigation measures discussed on page 9.

Requirement: The Draft Stage 3 Pre-Opening Plan must include improvements for place, walking and cycling on Broadway

2.9. TfNSW must identify how measures that increase road capacity *will be removed* if the modelled outcomes do not materialise

The Plan does not identify when mitigation measures such as the removal of the Allen Street off-ramp pedestrian crossing and capacity enhancements, or Bridge Road right turn ban can be reinstated if either the modelled scenarios do not eventuate, or new projects significantly shift vehicle demand (e.g. Western Harbour Tunnel motorway opening 2026).

The Draft Stage 3 Pre-Opening Plan must identify a mechanism to evaluate road network performance and remove interventions (such as intersection augmentations at Allen Street and Pyrmont Bridge Road off-ramps) that are inconsistent with Government policy and have negative impacts on people, places and productivity.

Requirement: The Draft Stage 3 Pre-Opening Plan must include triggers or performance standards which roll-back 'mitigation measures' that increase vehicle capacity if adverse outcomes occur.

2.10. TfNSW proposed gantries do not represent an integrated “Smart Motorway” approach

The City supports Smart Motorway technology to improve the efficiency and safety of a motorway by managing traffic flows. The Draft Stage 3 Pre-Opening Plan identifies Smart Motorway Management ramp metering.

The Plan does not identify why this measure does not mitigate the need to funnel traffic from the motorway network through local streets.

Requirement: The Draft Stage 3 Pre-Opening Plan must extend the potential benefits of “smart motorway” to avoid funnelling vehicle traffic into local main streets in Pyrmont and City Centre

2.11. Summary of requirements outlined in Section 2

TfNSW must address the following issues relating to the fundamental flaws in the justification and scope of the Draft Stage 3 Pre-opening Plan:

1. TfNSW must comply with the consent condition E63 (2.1).
2. TfNSW must undertake an independent review of The Draft Stage 3 Pre-Opening Plan.
3. TfNSW must demonstrate alignment with Government strategies such as Future Transport, Road Safety Action Plan and the Active Transport Strategy (2.2).
4. TfNSW must demonstrate how they have used Movement and Place or *develop the plan* using Governments Movement and Place policy (2.2.2).
5. TfNSW must address *all* road user performance *and* include road safety performance consistent with NSW Government policy (2.2.2).
6. TfNSW must make their SMPM model available for peer review, and disclose all assumptions, including assumptions used for traffic modelling of existing and future land use in Pyrmont and Ultimo in particular, traffic generation rates assumed for development, and background traffic growth (2.4.1).
7. TfNSW must show how the proposed ‘mitigations’ will stabilise traffic into/out of the City Centre and Pyrmont. Further, TfNSW must show how they account for key attributes of the strategic modelling process as raised in section 2.4.1.
8. TfNSW must re-do transport modelling and include committed projects such as Sydney Metro West (with a station at Pyrmont) and using fit for purpose methods and modelling packages that are consistent with the NSW Government’s ‘vision and validate’ approach rather than ‘predict and provide’ approach (2.4.2).
9. TfNSW must provide evidence that the Sydney Strategic Motorway Planning Model (SMPM) model has been calibrated to assess multi-modal travel patterns (for example, mode shift onto Metro West). This should include evidence of the validity of SMPM outputs using a “post opening” assessment of SMPM modelling undertaken for previous stages of WestConnex (2.5).
10. TfNSW must explain any inconsistencies in traffic projections developed for INSW’s Blackwattle Bay Transport Study and the Draft Stage 3 Pre-Opening Plan (2.6).
11. TfNSW must assess the impacts of removing the signalised pedestrian crossing on Harris Street and introducing an additional traffic lane on Allen Street will have on people walking, particularly in terms of increased delay and reduced accessibility (2.6.1).

12. TfNSW must accept the finding of the Pyrmont Peninsula Place Strategy (PPPS) about the impacts that traffic coming from Western Distributor off-ramps are having/will have on Harris Street and Pyrmont Bridge Road. TfNSW should develop Mitigation measures to address safety of all road users and improving amenity and place quality (2.7).
13. TfNSW must address the impact of the Allen Street off-ramp on the future development of Pyrmont (2.7.1)
14. TfNSW must identify a mechanism to evaluate road network performance and remove interventions that are inconsistent with Government policy and have negative impacts on people, places and productivity (2.9).
15. TfNSW must explain how they will use the Smart Motorway gantries to improve the efficiency and safety of a motorway, and why it considered this option preferable to the Pyrmont Place-based Transport Study recommendation to rationalise and remove accesses. TfNSW should make available any assessment of ramp metering options (2.10).
16. TfNSW should review access for heavy vehicles travelling through Pyrmont and Ultimo.
17. TfNSW should describe how *Cabinet* endorsed place-based plans such as the *Pyrmont Peninsula Place Strategy* and the *Tech Central Place Based Transport Strategy* and other major projects such as the Western Harbour Tunnel crossing have been used to measure network work performance and develop mitigation measures.
18. The Plan must *specifically* address why Harris Street (identified as a future high street with one lane of traffic in each direction) is being used to store vehicles to improve the performance of the Motorway network.
19. TfNSW should stop investing in road projects in inner Sydney including the Western Distributor Network Improvements until the full benefits of the committed motorway and Sydney Metro investments have been realised.
20. TfNSW should commit to prioritising people over cars on surface streets in Pyrmont, notably Pyrmont Bridge Road and Harris Street, consistent with the approach underpinning the Pyrmont Peninsula Place Strategy. This should include measures to protect people crossing Allen Street from vehicles exiting the Motorway, such as a 40km/hr speed limit (across the peninsula), speed bump, red light/speed camera.
21. TfNSW must fund tactical and permanent mitigations measures to reclaim road space for place on Broadway (tactical solution and permanent solution) consistent with Tech Central Place-based Transport Strategy.

