

City of Sydney Submission to Western Distributor Network Improvements proposal

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Executive summary

This document is the City of Sydney's (the City) submission on the Review of Environmental Factors (REF) for the Western Distributor "Road Network Improvements" (the proposal). This submission addresses the City's key concerns about the proposal, its impact and the decision-making process leading to its exhibition.

The proposal will cause substantial impacts on place and safety in Pyrmont-Ultimo

The proposal will have significant impacts on safety, people and place in Pyrmont and Ultimo, including:

- Removing 71 trees, making up almost 10% of trees across the area assessed in the REF , including more than a third of trees in both the Darling Harbour and Allen Street zones of the study area.
- Increasing traffic on surface streets by providing additional capacity on the Pyrmont Bridge Road and Allen Street off-ramps - inducing traffic from the motorway network to access Pyrmont. Increased traffic will reduce amenity, safety and bus reliability on the streets of Pyrmont.
- Prioritising cars over people walking by removing a signalised pedestrian crossing on Harris Street and replacing a zebra crossing with signals on the Pyrmont Bridge Road off-ramp
- Compromising the ability for Sydney Metro to deliver additional space for people walking on Pyrmont Bridge Road (as part of the future Pyrmont metro station)
- Disrupting public transport services in Pyrmont, an area with limited connections to other areas
- Banning existing right turn from off-ramp into Pyrmont Bridge Road, causing significant rat-running on Harris Street and Pyrmont Bridge Road
- Reducing the visual amenity and heritage value of the iconic Anzac Bridge through the installation of obtrusive gantries

The sum of these impacts will hinder the NSW Government's ability to achieve its Vision and growth aspirations outlined in the Pyrmont Peninsula Place Strategy.

The project will not solve the cited safety concerns or motorway queuing issues

The City strongly supports road management and investment to reduce the number of fatal and serious injuries from crashes. The City recognises that crashes occur across the NSW road network, funds are limited and thus evidence-based approaches to target investment are crucial.

The REF for this proposal indicates that Transport for NSW (TfNSW) staff have either not applied or incorrectly applied NSW Government frameworks – especially in regard to assessing the claims of significant road safety benefits.

TfNSW justifies the new Fig Street on-ramp on the basis of the cited need to address over "100 crashes in 12 months" on the eastbound weave / merge area of the Western Distributor. Our review of TfNSW crash data for the 14½ years between 2007 and 2021 identifies only 39 reported crashes – an average of 2.7 crashes per year. When the City sought clarification, TfNSW advised¹ that their figure included near misses and other observed incidents. This is contrary to the

¹ TfNSW response to *City of Sydney request (#1) for additional information relating to the TfNSW Western Distributor Road Network Improvements Proposal*

nationally agreed ATAP process and is a misleading representation of that data, to justify the proposal.

Regarding queuing, TfNSW justifies the proposal based on its potential to address a purported major issue of queuing on the off-ramps and its impact on motorway performance. However, even by the analysis presented in the REF, the existing infrastructure is able to accommodate the modelled demand without the additional lane proposed. Further, it is extremely unlikely that capacity increases at off ramps to inner city surface street network will deliver any lasting congestion reduction on the motorway.

The proposal conflicts with adopted policy and planning

The proposal undermines the vision and objectives that the NSW Government has publicly adopted in a number of recent strategies and plans. As a result, it erodes confidence in the value of the NSW Government's strategic planning.

The City's submission takes as its overarching framework the NSW Government's own policies and plans, including *Future Transport*, movement and place framework, the investment in Metro West and the Pyrmont Peninsula Place Strategy. The proposal explicitly contradicts the objectives in each of these documents. The Pyrmont Peninsula Place Strategy identifies, among other things, the need to reduce the traffic function of Harris Street and provide additional pedestrian crossing opportunities. Instead, the proposal funnels additional traffic from the Western Distributor off-ramp at Allen Street into Harris Street and removes a pedestrian crossing, making walking along what should be Pyrmont's high street feel less comfortable and less safe.

Additionally, TfNSW is currently developing the Pyrmont Ultimo Transport Plan . The proposal is operating separate and contrary to this process and advancing a siloed, road 'solution' in the very precinct that TfNSW is purportedly working on a plan to address a complex, multi-modal, place-based problem.

TfNSW has failed to undertake meaningful consultation

Prior to the exhibition of the REF City staff were not consulted about any aspect of the proposal. Senior staff have spent thousands of hours collaborating on seven related strategic planning processes with TfNSW over the past three years. The most relevant is the transport plan (PUTP) to support and implement the Pyrmont Peninsula Place Strategy. The City consistently and specifically requests visibility of any TfNSW proposals affecting planning processes. There are no commercial in confidence, contractual or security/risk issues that would justify TfNSW staff withholding information on the proposal from City staff.

The current public consultation risks eroding community confidence in TfNSW. The web portal for the project states that TfNSW is only interested in feedback from the community in-so-far as it relates to "construction methodology and scheduling" which implies that TfNSW is not interested in feedback on the proposal itself.

The sum of the impacts of the proposal undermines the ability of for the NSW Government and City of Sydney to unlock productivity, provide new jobs, new housing and better places and win community support. This is putting at risk the special contributions scheme that aims to deliver up to \$280 million to help pay for the new Pyrmont Metro station and the \$4.9 billion in additional economic output outlined by the Pyrmont Peninsula Economic Development Strategy.

Summary of requests

- R2-1 TfNSW must reconsider the proposal based on input provided by the City of Sydney through the engagement process. There are fundamental flaws in the justification and scope of the proposal, inconsistencies with NSW policies and shortcomings in the REF document.
- R2-2 TfNSW should release the Strategic Business Case and associated assurance reviews to provide transparency to the Council and the Community for the justification and assumptions behind the proposal.
- R2-3 TfNSW should extend the consultation period for the Review of Environmental Factors (REF) for the Western Distributor Road Network Improvements proposal by two weeks to key stakeholders, community groups and individuals adequate time to respond to the REF including any new background material published.
- R2-4 TfNSW must re-do transport modelling for this proposal to 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.
- R2-5 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.
- R2-6 TfNSW should make use of the VISSIM simulation model that it developed for the Fish Markets / Blackwattle Bay precinct. In addition, TfNSW should justify the validity of its questionable approach of using SMPM outputs as inputs to SIDRA intersection modelling for the purpose of estimating traffic flows at surface street level (i.e. Fig Street / Harris Street and Pyrmont Bridge Road / Bank Street intersections).
- R2-7 TfNSW must provide details on how it arrives at the inputs used in the SIDRA intersection analysis. Given that these volumes are used as the rationale for major changes two intersections, at a minimum, TfNSW should include the source of the forecasts and state clearly that no induced traffic is assumed.
- R2-8 TfNSW must explain any inconsistencies in traffic projections developed for INSW's Blackwattle Bay Transport Study
- R2-9 TfNSW to provide 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.
- R2-10 TfNSW must explain why they have used an alternative road safety framework to support their investment decision when there is an existing nationally agreed methodology, which underpins most of its road safety analysis and investment.
- R2-11 TfNSW must explain how it has been able to compare the investment case transparently and fairly for safety improvements in this proposal with other proposals competing for constrained funding within NSW.
- R2-12 TfNSW should review the Strategic Business case and reassess the benefits associated with the Smart Motorway Gantries and provide transparent information to the community about the economic merit of the proposal, with and without the gantries.

- R2-13 TfNSW must acknowledge that the proposal is part of the WestConnex Network Improvement program.
- R2-14 TfNSW must provide evidence that it adopted a “holistic” approach to motorway assessment that considered the need for the proposal alongside the existing WestConnex, especially the Western Harbour Tunnel.
- R2-15 TfNSW must update the REF to address the impacts of the proposal on Metro West and Pyrmont Station, including direct impacts on patronage (rail vs road mode choice), and indirect impacts (lower patronage from lower growth and/or productivity due to increased traffic).
- R2-16 TfNSW must update the REF to be consistent with the Pyrmont Peninsula Place-based Transport Strategy (PBTS).
- R2-17 TfNSW must cease all planning for changes to the Western Distributor and its access to and from Pyrmont until Transport for NSW and the City of Sydney complete the transport planning for Pyrmont (Pyrmont Ultimo Transport Plan). Integration of the two approaches should then be undertaken, if any changes to Western Distributor are required.
- R3-1 TfNSW must provide outcomes of traffic assessment of the proposal, clearly showing modelled changes to traffic volumes on key streets including Harris Street, Wattle Street, Broadway, Pyrmont Bridge Road, Bank Street.
- R3-2 TfNSW must provide existing and projected traffic volumes for each leg of the Pyrmont Bridge Road and Harris St intersection, and future forecast volumes.
- R3-3 TfNSW must assess the impacts of removing of 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.
- R3-4 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 the proposal to address safety of all road users and improving amenity and place quality.
- R3-5 TfNSW must assess the impacts of converting the Pyrmont Bridge Road off-ramp zebra crossing to a signalised intersection on people walking, particularly in terms of increased delay and reduced accessibility.
- R3-6 TfNSW must commit to prioritising people over cars on surface streets in Pyrmont, including Pyrmont Bridge Road and Harris Street, consistent with the approach underpinning the Pyrmont Peninsula Place Strategy.
- R3-7 TfNSW should review access for heavy vehicles travelling through Pyrmont and Ultimo.
- R3-8 TfNSW must update the REF with an assessment of the proposal's impacts on place and future development. The City would be pleased to provide input into the assessment.
- R3-9 TfNSW to respond to the identified discrepancies between the proposal and adopted policy/strategy.
- R3-10 TfNSW should put any proposal relating to the Western Distributor on hold until the TfNSW Pyrmont-Ultimo Transport Plan is completed.
- R3-11 TfNSW to avoid impacts on existing bus and L1 light rail services and improve local public transport connections to Pyrmont and Ultimo.
- R3-12 TfNSW should stop investing in new motorway 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.
- R3-13 TfNSW must develop a surface road plan that reduces vehicles travelling through the Pyrmont peninsula. The plan should reallocate road space to people walking and cycling, in response to opportunities created by diverting vehicles away from the City centre via the

WestConnex bypasses – City north (Western Harbour Tunnel) and South East (M4-M5) and mode shift to Metro West.

- R3-14 TfNSW must revise the Arboricultural Impact Assessment (AIA) so that it guides the design of the proposal in a way that preserves trees and meaningfully informs the REF, rather than being based on TfNSW advice that results in the removal of 71 trees. TfNSW must consider high retention value trees as a site constraint and modify any design to ensure their retention and protection.
- R3-15 TfNSW must ensure that the AIA provides Tree Protection Zones to support any tree removal.
- R3-16 TfNSW must ensure that the AIA includes any plans that are referenced.
- R3-17 TfNSW must ensure that the AIA assesses all trees affected by the proposal.
- R3-18 TfNSW should have regard to the controls in Section 3.5 of the Sydney DCP 2012 relating to urban canopy and tree management.
- R3-19 TfNSW should review their proposal to reduce the extent of tree and vegetation removal. Where removal is sufficiently justified, trees and vegetation must be replaced and improved by the proponent.
- R4-1 TfNSW must acknowledge that the proposal will funnel additional traffic onto surface streets and assess the impacts.
- R4-2 TfNSW should commit to prioritising people over cars on surface streets in Pyrmont, notably Pyrmont Bridge Road and Harris Street. 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.
- R4-3 TfNSW should change its proposal to address the inaccuracies in their AIA and develop a plan to undertake intersection roadwork and utilities adjustments that do not remove trees.
- R5-1 TfNSW must undertake a complete assessment of trees in Zone C and all impacts on all trees.
- R5-2 TfNSW should consider design alternative to protect the 22 Medium Retention Value palm trees located at the intersection of Pyrmont Bridge Road and Bank Street. TfNSW should consider these trees as a material constraint to the development.
- R5-3 TfNSW should provide the information to support the recommendation for removal of 24 trees in Zone E.
- R6-1 TfNSW should delay any consideration of constructing the Fig Street on-ramp until after the benefits of WestConnex have been realised and demonstrate that the investment is required.
- R6-2 TfNSW should provide evidence that:
- removal of trees has considered only when all other alternatives have been exhausted.
 - impacts to trees have been minimised and develop a plan to locate construction sites and undertake utilities work in such a way as to avoid all tree removal.
 - given their high amenity value, the AIA recommendation regarding the eight Cabbage Palm Trees (Trees 387 to 394) will be translocation given their high amenity value if all other alternatives have been exhausted. These trees are listed on the City's Register of Significant Trees.
- R7-1 TfNSW must develop further details of the design of the gantries, as the Statement of Heritage Impact (SHI) recommends.
- R7-2 TfNSW must demonstrate, in accordance with the SHI, that the gantries better complement and insofar as possible blend with the high-quality design and modern, minimalist detailing of the Anzac Bridge; and do not detract from the uninterrupted volume of the Bridge.

- R7-3 TfNSW must explain how the proposal 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.
- R7-4 TfNSW must explain why it did not consider improving bus priority from Victoria Rd to the City and Pyrmont as part of the proposal.
- R8-1 TfNSW should design the construction site compound at Bank Street (Glebe Island Bridge) to avoid the need for tree removal or alternative locations should be considered that would avoid the need to remove trees. The removal or extensive pruning of healthy trees of high to medium retention value for the purpose of a temporary construction feature is unacceptable and is not supported by the City.
- R8-2 TfNSW must ensure that the REF clarifies if any additional trees in the location of the construction site compound will be pruned or removed.
- R8-3 TfNSW must consider the impacts on the setting and character of Pyrmont and Ultimo in the context of proposed traffic network improvements and must comply with recommendations and mitigations on page 6 of the SHI.

1. Introduction

1.1. Purpose of document

This document is the City of Sydney's (the City) submission on the Review of Environmental Factors (REF) for the Western Distributor "Road Network Improvements" (the proposal).

Aurecon Australasia Pty Ltd and Transport for NSW prepared the REF.

This submission represents the view of the City as the road and place manager for much of the network the project will impact on.

This submission has been informed by input from the Council of the City of Sydney.

1.2. Scope of document

This submission addresses the City's key concerns about the proposal, its impact and the decision-making process leading to its exhibition.

The City's submission takes as its overarching framework the NSW Government's own policies and plans, including *Future Transport*, movement and place and the investment in Metro West, and the Pyrmont Peninsula Place Strategy.

The submission examines the lack of justification for the proposal from road safety, transport network and land use growth and place improvement perspectives. The submission identifies the project's significant impact on local amenity and the environment, especially regarding loss of mature trees in an area of significant planned growth.

2. Issues with TfNSW / government processes

2.1. Lack of actual collaboration with the City of Sydney

The City's general approach is to partner with others to achieve better outcomes for our community. We have many recent examples where partnerships between the City and TfNSW have achieved that.

TfNSW staff have deliberately withheld all information on the Western Distributor proposal from City staff. This is despite City staff having spent thousands of hours collaborating on seven related strategic planning processes with TfNSW over the past three years. The most relevant is the transport plan to support and implement the Pyrmont Peninsula Place Strategy.

In these planning processes, City Staff have consistently and specifically requested full visibility of any TfNSW proposals affecting these planning processes, including any for changes to the Western Distributor, especially regarding its interfaces with Pyrmont/Ultimo, and the City Centre.

We note that while TfNSW consulted Transurban in developing this proposal, they did not consult with the City of Sydney.

There are no commercial in confidence, contractual or security/risk issues that would justify this lack of collaboration.

We have asked TfNSW to provide more information to understand the impacts that the proposal and the additional traffic it causes will have on safety in the streets of Pyrmont but have been told that no further details will be provided beyond what is in the REF.

It was particularly disappointing to see that in its original invitation to provide input (web portal), TfNSW constrained stakeholder input to limiting construction impacts:

"We are seeking your feedback on how we can minimise impacts during construction.

All feedback will be considered when the project team is determining construction methodology and scheduling."

When City staff raised the issue of limits of input encouraged, TfNSW modified the text to the following:

"We are seeking feedback from the community until 5pm on Friday 28 October 2022.

All feedback will be considered when the project team is determining construction methodology and scheduling".

It is disappointing that TfNSW is seeking to limit its commitment to engagement to only considering construction methodology and scheduling rather than any modifications to the proposal itself.

The lack of open respectful engagement from TfNSW calls into question the commitment of the organisation to working productively with local government and the community.

Request(s)

R2-1 TfNSW must reconsider the proposal based on input provided by the City of Sydney through the engagement process. There are fundamental flaws in the justification and scope of the proposal, inconsistencies with NSW policies and shortcomings in the REF document.

- R2-2 TfNSW should release the Strategic Business Case and associated assurance reviews to provide transparency to the Council and the Community for the justification and assumptions behind the proposal.

2.2. Flawed engagement with the community and stakeholders

TfNSW chose to release the REF for the proposal late on Wednesday 21st September - the day before a public holiday and at the beginning of two weeks of school holidays. This timing makes it difficult for community groups and individuals to respond to the engagement process. From experience we know that many individuals and community groups are away during this period.

The REF document is 300 pages long, and has multiple elements – new motorway ramp, two intersection expansions, new Anzac bridge gantries and establishment of four construction compounds. These different elements all have multiple impacts that need to be carefully considered.

Request(s)

- R2-3 TfNSW should extend the consultation period for the Review of Environmental Factors (REF) for the Western Distributor Road Network Improvements proposal by two weeks to key stakeholders, community groups and individuals adequate time to respond to the REF including any new background material published.

2.3. The need for additional off-ramp lanes is unfounded

TfNSW justifies the proposal based on its potential to address a purported major issue of queuing on the off-ramps and its impact on motorway performance. This is the rationale TfNSW gives for the additional lane on Pyrmont Bridge Road off-ramp that forms a key part of the proposal.

However, *even by the analysis presented in the REF*, the existing infrastructure is able to accommodate the modelled demand without the additional lane proposed. From the intersection with Pyrmont Bridge Road to the merge point, the off-ramp is over 500m long. The REF cites modelling outputs that show that in 2033, without the proposal and with the assumed growth in traffic, the queues only reach 174m in the AM peak and 108m in the PM peak² – far shorter than the existing 520m of ramp.

This clearly contradicts TfNSW's claim that "*predicted queues on off ramps would impact traffic flows on the Western Distributor*". TfNSW proposes a complex and costly engineering solution that encourages driving to solve a problem that, by its own analysis, does not exist.

² Page 83 of REF



Figure 1 Exit ramp length for the AM peak with and without the proposal.

2.4. Inappropriate application of traffic modelling

The REF relies on an inappropriate approach to traffic modelling

TfNSW applied “predict and provide” modelling contrary to its Movement and Place Framework, which favours a “Vision and Validate” approach. TfNSW also used 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:

- In a response to the City’s Request for Information, TfNSW noted that the “future 2023 and 2033 traffic models were informed by the Sydney Strategic Motorway Planning Model (SMPM)”. (RFI 5 Oct)
- 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.”
- The City is of the view that if TfNSW insists on using predict and provide modelling (contrary to its own framework), then it should at least make use of more task- appropriate modelling tools that it has at its disposal. As an example, TfNSW developed a VISSIM model to assess future traffic patterns associated with the b Markets / Blackwattle Bay precinct. The City is of the view that TfNSW should have updated this model to reflect latest development projections and the mode share assumptions that reflect commitment to Pyrmont Metro Station - and then used in the assessment of future traffic volumes caused by the proposal.

The TfNSW assumptions for background traffic growth on Anzac Bridge/Western Distributor are selective and flawed

The REF pg. 73 asserts that ‘Average Daily Traffic count of vehicles travelling on the Western Distributor has increased between 2018 and 2019.’

Annual average daily traffic volumes on the Western Distributor did increase by 909 vehicles per day between 2018 and 2019 as shown in Table 6-2 of the REF, however the growth rate between these two years was an anomaly against a decade of minimal-to-no growth. Taking a longer view,

between 2010 and 2019, annual average daily traffic increased by only 217 vehicles per year; less than a quarter of the growth rate stated in the report. It appears that TfNSW use data for only two years to misleadingly give the impression of strong traffic growth.

TfNSW also advise “Anzac Bridge and Western Distributor are currently over capacity and experience safety issues requiring immediate intervention”. The City notes that the capacity of a route is fixed and cannot be exceeded. This TfNSW ‘statement of fact’ is therefore nonsensical and misleading. The City’s response to the REF’s treatment of safety issues is at Section 2.5.

The whole premise of the proposal is to provide for increased demand. However, motorway expansion projects across the world have shown that providing additional capacity to meet projected demand creates actual demand. 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.

Traffic growth assumptions in REF are inconsistent with other State Government documents

Table 6-6 in the REF provides projections for the AM peak 1 hour traffic volume at the Pyrmont Bridge Road intersection showing growth from 3,888 vehicles in 2017 to 4,281 and 4,560 in 2023 and 2033 respectively.

The Blackwattle Bay Transport Study³ (Table 7-10, pg. 130) assumes a very different growth profile, reaching only 3,868 in the 2033 AM peak 1 hour, 15% lower than the REF assumes.

The REF prepared by TfNSW does not align with either the approach or the data used by INSW, another state government agency. Both agencies should be working from the same base set of assumptions.

The REF does not explain assumptions about inputs into the intersection modelling

The Blackwattle Bay Transport Study notably includes assessment of 2033 both with and without transport interventions which is standard practice. The traffic volumes in the case with interventions is higher than without, implicitly acknowledging that providing capacity increases on the road network will unlock more latent demand.

The REF for the proposal does not provide any detail about how TfNSW arrived at the inputs used in the SIDRA intersection analysis noting only that: “*future (2023 and 2033) AM and PM peak hour traffic volumes ... have been assessed.*” (pg. 82 of REF). Given that these volumes are used as the rationale for major changes at two intersections TfNSW should, at a minimum, (a) include the source of the forecasts; and (b) and clearly confirm that no induced traffic is assumed.

Requests

- R2-4 TfNSW must re-do transport modelling for this proposal to 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.
- R2-5 TfNSW must provide evidence that the 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.
- R2-6 TfNSW should make use of the VISSIM simulation model that it developed for the Fish Markets / Blackwattle Bay precinct. In addition, TfNSW should justify the validity of its questionable approach of using SMPM outputs as inputs to SIDRA modelling for the

³ Blackwattle Bay State Significant Precinct Attachment 4: Transport Management and Accessibility Plan, Aecom for INSW, June 2021

purpose of estimating traffic flows at surface street level (i.e. Fig Street / Harris Street and Pyrmont Bridge Road / Bank Street intersections).

- R2-7 TfNSW must provide details on how it arrives at the inputs used in the SIDRA intersection analysis. Given that these volumes are used as the rationale for major changes to two intersections, at a minimum, TfNSW should include the source of the forecasts and state clearly that no induced traffic is assumed.
- R2-8 TfNSW must explain any inconsistencies in traffic projections developed for INSW's Blackwattle Bay Transport Study
- R2-9 TfNSW to provide 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.

2.5. Misleading application of NSW Government investment decision making process

It is not clear what the benefits of this project are, how they are measured and how the options (if any) assessed relate to these benefits. In addition, the use of road safety data to support this investment is flawed and lacks transparency.

Adherence to NSW Government funding processes

TfNSW has a robust investment decision framework underpinned by the Australian Transport Assessment and Planning (ATAP) Guidelines that “outline best practice for transport planning and assessment in Australia.” In addition this framework is supported by NSW Treasury business case templates and TfNSW Principles and Guidelines for Economic Appraisal of Transport Investment and Initiatives, Transport Economic Appraisal Guidelines 2016.

TfNSW have advised that “Cost estimates are not currently publicly available and will not be provided”.

The funding status of this project is not clear. The project is not listed on the Infrastructure NSW - NSW Major Projects Infrastructure Pipeline of projects costing over \$50 million.

The 2022/23 NSW Budget papers provide no information about this project.

Inappropriate use of Road Safety Crash Data

The City strongly supports road management and investment to reduce the number of fatal and serious injuries from crashes. The City recognises that crashes occur across the NSW road network, funds are limited and thus evidence-based approaches to target investment are crucial.

Examination of the REF for this proposal indicates that these frameworks have either not been applied, or applied incorrectly, despite the claims of significant road safety benefits.

The REF “Need for the proposal” states that there are “*there are currently over 100 crashes occurring per year. Without mitigation, any increase in traffic would add pressure to the road network and safety*”.

The City's review of TfNSW crash data on the eastbound weave / merge area of the Western Distributor for the 14½ years between 2007 and 2021 identifies only 39 reported crashes in total (4 Serious injuries and one fatality, which occurred in August 2020) – an average of 2.7 crashes per year. This is the section of the Western Distributor where the proposal (specifically the new Fig Street on-ramp) could tangibly affect road safety outcomes.

TfNSW advised that it included near misses in the road safety case for this project⁴. It “*undertook specific camera surveys throughout October 2019 to observe traffic patterns on the Western Distributor corridor between Anzac Bridge and Sydney Harbour Bridge. As part of these surveys, crashes **and near misses** were observed on a regular basis, averaging more than twice per week. This correlates with the reported number of crashes and near misses on average per year in the REF*”. Yet the REF omits to reference near misses, creating a perception that road safety is a key benefit

At a more fundamental level:

- It is highly unusual for TfNSW to include ‘near misses’ as part of estimating the road safety benefits. This is reinforced by the Crash Values methodology in the *Principles and Guidelines for Economic Appraisal of Transport Investment and Initiatives Transport Economic Appraisal Guidelines 2016*
- ATAP Guidelines approach uses the crash history to establish a crash rate for each severity level for the do-nothing and project case. ATAP says “*depending on data availability, crashes may be considered at different categorisations and levels of aggregation:*
 - *Severity level: fatal, serious injury, other injury, property damage only, or ‘casualty’ which groups together fatal and all injury crashes*
 - *Crash type: for example, in the case of roads, head-on, run-off road, pedestrian, etc.*
 - *Location: rural, urban, urban freeway.”*
- There is no “near misses” category in this assessment framework.

TfNSW removal of ‘Smart Motorway’ gantries from proposal

- Following media reports of statements by the NSW Premier opposing the inclusion of gantries on Anzac Bridge, TfNSW advised the City on 13/10/2022 that “It seems clear however that the gantries will not be delivered as part of the project. “
- In the REF, TfNSW claim benefits from the gantries (noting these stated benefits are not explained). If TfNSW is no longer incorporating gantries into the proposal, it must review the Strategic Business case. If the reduction in benefits means the investment is no longer economically feasible, the proposal should not proceed.

Requests

- R2-10 TfNSW must explain why they have used an alternative road safety framework to support their investment decision when there is an existing nationally agreed methodology, which underpins most of its road safety analysis and investment.
- R2-11 TfNSW must explain how it has been able to compare the investment case transparently and fairly for safety improvements in this proposal with other proposals competing for constrained funding within NSW.
- R2-12 TfNSW should review the Strategic Business case and reassess the benefits associated with the Smart Motorway Gantries and provide transparent information to the community about the economic merit of the proposal, with and without the gantries.

⁴ TfNSW’s response to City’s Request for Information, received 5th October 2022

2.6. Lack of transparency on funding as WestConnex integration works

TfNSW has not been transparent about the source of funding for the proposal. There is also a lack of clarity surrounding the relationship between the proposal's benefits and those of the multi-billion-dollar WestConnex project. I.e., the proposal primarily arises as an integration work for WestConnex (including Western Harbour Tunnel).

To increase transparency and accountability, there is a strong case that TfNSW project costs should be attributed to WestConnex Network Integration. The City notes a very similar sounding project is listed in Appendix 2 of the June 2021 Auditor General's report WestConnex: changes since 2014:

- *"M4/M5 Link and Rozelle Interchange - Sydney harbour bridge southern approaches (ANZAC Bridge tidal flow and Western Distributor Improvement Works:*
- *Increasing capacity of Anzac Bridge and Western distributor to address land use changes in Blackwattle Bay area. Future \$207m"*

Rather than acknowledge this connection, the REF distances the proposal from WestConnex. It downplays any benefits from WestConnex in this area – notwithstanding the Western Harbour Tunnel component was justified as a City bypass. The REF lists specific negative impacts of the WestConnex - Western Harbour and Stage 3 Tunnels in this area:

- *"increased traffic demand on Anzac Bridge (Stage 3)*
- *increased traffic demand on connecting local road network (Stage 3)*
- *increased heavy vehicle movement Western Distributor Network Improvements (Stage 3)*
- *air quality monitoring and ventilation requirements. (Stage 3)*
- *project expected to reduce noise for most properties on nearby surface roads (Western Harbour Tunnel)*
- *small impact on local air quality (Western Harbour Tunnel)".*

The Auditor General's June 2021 report findings include that

"Government decisions to fund WestConnex related projects outside of WestConnex's \$16.812 billion reported budget have reduced transparency over costs and understate the full cost of WestConnex"

The Auditor General recommended greater transparency and accountability for the total cost of WestConnex, and associated improvement works and, further, that by June 2022:

- "TfNSW should provide transparent whole of program assurance on total costs and benefits throughout the project life-cycle when complex projects are split into sub-projects."

Despite this recommendation and the clear connections between the proposal and WestConnex TfNSW have continued to mislead the Community about the true impacts and subsequent costs of the WestConnex project.

Requests

R2-13 TfNSW must acknowledge that the proposal is part of the WestConnex Network Improvement program.

R2-14 TfNSW must provide evidence that it adopted a "holistic" approach to motorway assessment that considered the need for the proposal alongside the existing WestConnex, especially the Western Harbour Tunnel.

2.7. The REF provides insufficient analysis of the impacts of the proposal on the loss of economic potential for Pyrmont from Metro West - Pyrmont Station.

The NSW Government's Pyrmont Peninsula Place Strategy ('the Place Strategy') was supported by an extensive evidence base, including a place-based transport strategy (PBTS). The proposal is not consistent with the Place Strategy, the PBTS or the subsequent Infrastructure Delivery Plan (below).

The City believes the proposal therefore undermines public and industry confidence in land use and transport decision making.

In particular, the proposal's rationale and timing appear to conflict with the NSW Government's important investment in Metro at Pyrmont, which is a key element of the Place Strategy.

- BIG MOVE 3 of the Place Strategy is: *Connect to Metro*.
- The Place Strategy states: the Pyrmont Metro station will increase public transport use and overcome difficulty in reaching the Peninsula by car or otherwise. Pyrmont's growth is contingent on continually improving public transport, walking, and cycling levels.

In describing Pyrmont Metro Station, the Sydney Metro West Environmental Impact Statement states:

The station will enable a new level of connectivity to the Pyrmont Peninsula and will prioritise pedestrian movement around the station through vibrant street frontages and open public spaces.

The Place Strategy's Infrastructure Delivery Plan describes how the priorities for transport items in the infrastructure schedule are derived from the PBTS. It is informed by transport principles established for the Place Strategy that align with the outcomes identified in Future Transport 2056.

Key components of the PBTS include:

- A new metro station at Pyrmont, as announced by the State government in December 2020
- Reinforce the existing centre in northern Pyrmont around the new Metro station
- Complete connections to the primary centre around Union Square via active transport connections across the Peninsula between Pyrmont Bridge and Glebe Island Bridge and by extending the Goods Line link north
- Strengthen and extend the existing transit along Harris Street by connecting to The Bays Precinct to the north-west and to Redfern in the south-east by creating an intermediate public transport route along this alignment
- Reconfigure existing streets to reduce the barriers created by the existing through-traffic function and improve local access by reducing lane capacity, widening footpaths, and investigating converting one-way streets to two-way operation.
- Public transport interventions are based on a new Metro station in the northern portion of the Peninsula. The proposed public transport network provides for a future connection to The Bays Precinct, Redfern, and Parramatta Road.
- Transport interventions to improve the active transport network within Pyrmont are primarily focused on closing existing gaps in the network and improving connections to open spaces. Closing these gaps in the active transport network will also improve access to the new Metro station at Pyrmont.

The PBTS identified the opportunities within the Peninsula for limiting through traffic, and consequential road space reallocation to support places. It identified the potential for reducing the

number or scope of Western Distributor access points to and from Pyrmont. Reasonably, it identified (p.101) the need for proposed changes there to be considered in the context of connections to the Western Distributor. It did not include the current proposal in its list of proposed transport initiatives (p.128). It also could not reasonably be read as supporting this type of project being imposed in advance or separate to the detailed planning for streets in Pyrmont and Ultimo (that TfNSW and the City have been engaged in since the release of the Place Strategy).

The proposal also diminishes the benefits of the Metro station by placing increased traffic in the Peninsula, particularly, along Pyrmont Bridge Road where the metro station will be located, and on Harris Street where most people will walk, ride bicycles or will catch a bus to and from the station. The additional vehicular traffic undermines the station's effectiveness by preventing the transformation of these and other streets to better provide for metro patrons and an appropriate address and setting for new business and housing. This, in turn, undermines the economic potential that the metro has in promoting new higher value employment in its area of influence.

The loss of the transformational economic potential of the station undercuts its business case and is not discussed in the REF – this must be analysed and accounted for prior to the works receiving approval.

- R2-15 TfNSW must update the REF to address the impacts of the proposal on Metro West and Pyrmont Station, including direct impacts on patronage (rail vs road mode choice), and indirect impacts (lower patronage from lower growth and/or productivity due to increased traffic).
- R2-16 TfNSW must update the REF to be consistent with the Pyrmont Peninsula Place-based Transport Strategy (PBTS).
- R2-17 TfNSW must cease all planning for changes to the Western Distributor and its access to and from Pyrmont until Transport for NSW and the City of Sydney complete the transport planning for Pyrmont (Pyrmont Ultimo Transport Plan). Integration of the two approaches should then be undertaken, if any changes to Western Distributor are required.

3. Overarching issues affecting the proposal

3.1. Proposal will increase traffic and impact on safety and place in Pyrmont

Impacts of the proposal

The proposal will have significant impacts on safety, people, and place in Pyrmont and Ultimo, as summarised below:

The proposal induces traffic on surface streets, reducing amenity, safety, and bus reliability:

- The REF assumes that there will be approximately 25% more traffic wanting to use both the Pyrmont Bridge Road and Allen / Harris Street intersections (REF pg. 82). The REF assumes demand is static and does not acknowledge or assess the impact of induced traffic demand on surface streets, notably Harris St and Pyrmont Bridge Road.
- Currently, the delays and queuing at these intersections helps regulate the amount of traffic using them. The proposal would increase capacity and facilitate the projected 25% traffic increase through intersections and associated impacts on surface streets. Conversely, without the proposed intersection expansions this traffic increase would not occur.
- Taking a first principles approach, doubling the lanes on both off-ramps will roughly double the number of vehicles that can clear the intersection from that approach each cycle. This proposal clearly allows more traffic from the motorway onto surface streets and will likely cause ‘downstream’ congestion on Harris Street and Pyrmont Bridge Road.
- Increased traffic volumes and expanding intersections to prioritise vehicle flows from off-ramps into inner-city streets will put all road users at higher risk of being struck by vehicles.
- Increased traffic volumes will make Harris Street, Allen Street and Pyrmont Bridge Road noisier, more dangerous, and generally much less pleasant places to walk and spend time.
- Additional general traffic using these intersections will make bus services less reliable. This will limit the benefits of improved bus connections, such as along Victoria Road, or along Harris Street connecting to southern Sydney (South East Sydney Transport Strategy proposal).

The proposal explicitly prioritises cars over people walking

- The proposal expands the intersection of Allen Street / Harris Street and removes a pedestrian crossing leg. People wanting to cross the southern leg of Allen Street / Harris Street will now have to make three separate crossings, potentially increasing their delay by up to three minutes. The REF indicates that the only potential benefit would be an improvement of 8 seconds for vehicles⁵.
- The proposal also modifies the intersection of Pyrmont Bridge Road / Bank Street to prioritise vehicle movement into Pyrmont / Ultimo. The current zebra crossing of the off-ramp, that gives pedestrians priority over vehicles, is to be replaced by a signalised intersection. This change

⁵ During AM peak, forecast delay through Allen St / Harris St intersection reduces from 38 seconds to 30 seconds (Table 6-8, REF)

reverses this priority and introduces additional delay across what is already a slow, staged crossing of Bank Street.

The proposal could compromise the ability for Metro to deliver additional space for people walking on Pymont Bridge Road

- This proposal would induce traffic by increasing the capacity of off-ramps that funnel traffic onto Pymont Bridge Road.
- The future Pymont Metro station will require additional space for people walking on the northern side of Pymont Bridge Road connecting west across to Blackwattle Bay and the New Fish Markets.
- The [Blackwattle Bay Revised Transport Study](#)⁶ notes that “The application of the TfNSW Guide shows the generally narrow footpath corridor along Pymont Bridge Road adversely impacts the observed LoS (level of Service) for walking performance, even for existing conditions.” The study also notes that road space reallocation is “consistent with the vision and objectives established in the Pymont Peninsula Place Strategy” and is to be explored by the Pymont Ultimo Transport Plan.

Banning existing right turn from off-ramp into Pymont Bridge Road risks significant rat-running on Harris Street and Pymont Bridge Road

- Banning the right turn from the off-ramp onto Pymont Bridge Road risks creating significant rat-running through the heart of Pymont as it will encourage people wanting to travel west to exit the Western Distributor via the Allen Street off-ramp and drive along Harris Street and Pymont Bridge Road. This detour risks adding additional traffic to Harris Street which is meant to be the Peninsula’s high street and may reduce bus reliability during peak periods – an existing concern for residents. See Figure 2 below:



Figure 2 Impacts of banning right turn from off-ramp

Issue(s) with REF

TfNSW justifies widening off ramps and expanding intersections to prioritise traffic Western Distributor traffic flows at Pymont Bridge Road, and Allen Street / Harris Street, on the need to improve safety for drivers on the motorway network.

⁶Attachment 9 – Updated Transport Assessment Response to Submissions, Aecom for INSW, June 2022 (see page 35)

The REF, however, makes no assessment of the impacts that increased traffic, and removal of / changes to pedestrian crossings, will have on the safety of people on streets in Pyrmont and Ultimo. This is despite projecting a 25% increase in traffic through these intersections. The REF simply asserts that there will be no impact to people walking and cycling, when there will be increases in wait times for people walking, and significantly increased exposure to vehicles.

Increasing traffic volumes will directly put at risk plans for increased development and improvements in place along Harris Street that rely on Harris Street being a vibrant and activated main street for the peninsula. Indirectly, the downstream impacts will jeopardise development around Central (including Central Precinct development and Central Square project idea) and the Broadway project idea.

Request(s)

- R3-1 TfNSW must provide outcomes of traffic assessment of the proposal, clearly showing modelled changes to traffic volumes on key streets including Harris Street, Wattle Street, Broadway, Pyrmont Bridge Road, Bank Street.
- R3-2 TfNSW must provide existing and projected traffic volumes for each leg of the Pyrmont Bridge Road and Harris St intersection, and future forecast volumes.
- R3-3 TfNSW must assess the impacts of removing of 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.
- R3-4 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 the proposal to address safety of all road users and improving amenity and place quality.
- R3-5 TfNSW must assess the impacts of converting the Pyrmont Bridge Road off-ramp zebra crossing to a signalised intersection on people walking, particularly in terms of increased delay and reduced accessibility.
- R3-6 TfNSW must commit to prioritising people over cars on surface streets in Pyrmont, including Pyrmont Bridge Road and Harris Street, consistent with the approach underpinning the Pyrmont Peninsula Place Strategy.
- R3-7 TfNSW should review access for heavy vehicles travelling through Pyrmont and Ultimo.

3.2. Proposal will not address motorway queuing or congestion

Impacts of the Proposal

The proposal appears designed to make it more attractive for more people to drive to and through the Pyrmont / Ultimo area. The proposal specifically excludes any consideration of improvements to public transport access that a metro station at Pyrmont will bring.

The proposal does not address a fundamental cause of safety issues on the motorway, being too many on- and off-ramps spaced too closely together. The City understands that the Western Distributor and connections result from poorly planned expansion over many decades. In terms of addressing its design faults, the TfNSW Motorway design guide says motorway efficiencies and congestion is impacted by spacing of ramps (closer than 3km).

There is no evidence that the capacity increases at Allen St or Pyrmont Bridge Road will make the Western Distributor more efficient. Other weave merges, lane widths, lack of shoulders etc. will continue to cause disruptions to motorway reliability and efficiency

Issue(s) with REF

- The REF fails to account for the fact that any additional road capacity that the proposal would create at off-ramps and intersections will induce demand, currently suppressed. Experience across Sydney and around the world show that in an inner-city location such as this, connected to a metropolitan-wide motorway network, the proposed traffic capacity increases at the Allen Street and Pyrmont Bridge Road off-ramps will not reduce queuing and congestion on the Western Distributor for more than a very short time. Transparency around the proposed duration of any benefits is another reason for releasing the proposal Business Case immediately.
- The REF accepts the SIDRA traffic modelling outputs that fallaciously suggest that traffic queues would continue to grow. Drivers will only join a queue if they consider there are benefits. If the travel time is assessed as too long then driver behaviours will change. That is to say that traffic queues don't keep growing even when demand for travel increases because people make other choices, such as: to travel by a different route, at a different time, on a different mode – or to not make the trip at all.
- This proposal does not address the fundamental design flaw associated with on- and off-ramps that are too closely spaced. This issue is exacerbated when the ramps feed high activity centres, where traffic speeds must be low and there will be numerous downstream intersections (contrasted with arterial roads such as those connecting with the M4 west of Blacktown.) As countenanced in the PBTS, it should have looked at the option of decommissioning one or more access ramp.

3.3. Proposal will impact on planned development in Pyrmont and Ultimo

Impacts of the proposal

The additional traffic the proposal will bring into Pyrmont and Ultimo will impact on the ability for the NSW Government to achieve its Vision and growth aspirations outlined in the Pyrmont Peninsula Place Strategy ('the Place Strategy').

The Place Strategy provides a 20-year plan for future growth in the Peninsula, with 23,000 more jobs and up to 4,000 new homes required to be accommodated by government under new planning controls.

Prioritising motorway traffic through the Peninsula undermines the 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 and the \$4.9 billion in additional economic output outlined by the Pyrmont Peninsula Economic Development Strategy in support of the growth under the Place Strategy.

Specifically, the proposal increases traffic on Pyrmont Bridge Road (past the site of the new Pyrmont Metro Station), on Allen Street and along Harris Street and Broadway is in direct conflict with the place outcomes outlined to the community under the Place Strategy. The additional traffic means that the City will need to adapt its urban design response to these roads and streets resulting in a 20 to 30 per cent reduction in potential residential floor space yield.

Of particular concern to the City are the and the expansion of the off-ramp to the intersection of Allen Street and Harris Street (covered in Section 4) and the expansion of the off-ramp to Pyrmont Bridge Road (covered in Section 5). These changes will increase traffic in Pyrmont-Ultimo.

Issue(s) with REF

The REF fails to adequately consider and assess the impacts on place and future development.

Request(s)

R3-8 TfNSW must update the REF with an assessment of the proposal's impacts on place and future development. The City would be pleased to provide input into the assessment.

3.4. Proposal is contrary to adopted policy, strategy, and plans

Impacts of the proposal

The proposal undermines the vision and objectives that the NSW Government has publicly adopted in a number of strategies and plans, and as a result, erodes confidence in the effectiveness of strategic planning.

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 proposal runs contrary to all these adopted NSW Government policy and strategy.

Proposal threatens Tech Central and Central Precinct – key innovations areas.

Traffic increases caused by the proposal 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.

Proposal 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 proposal

Finding 2: The current planning framework promotes a project-based approach over a place-based approach to planning outcomes

The proposal 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

The proposal 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."

The proposal undermines the WHT project. The REF completely fails to acknowledge the benefit the WHT will have on the Western Distributor, noting only minor noise reductions and air quality improvements as operational impacts (pg. 221).

Proposal 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 it conflicts with the proposal
<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 proposal 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>The proposal 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>
<p>Direction 9 – Great homes that can suit the needs of more people: describes "<i>growth focussed primarily in residential areas... along the western side of the Peninsula</i>".</p>	<p>The sub-precincts where the Place Strategy focuses the most housing and jobs growth, Pymont Village, Blackwattle Bay, Wentworth Park and Ultimo are the sub-precincts most impacted by the Western Distributor Road Network improvements proposal.</p>

Proposal conflicts with Pymont Peninsula Place-based Transport Strategy (PBTS), July 2020

The Pymont Peninsula Place Place-Based Transport Strategy was prepared by VIAE for DPE to inform the development of the Pymont Peninsula Place Strategy. The PBTS describes the critical policy, movement and place-based outcomes required to ensure the draft Pymont Peninsula Place Strategy is supported by transport infrastructure serving both Pymont Peninsula and its surrounding context.

PBTS Direction	How it conflicts with the proposal
<p>The Sub-Precinct Masterplan for Harris Street describes it as a local high street and '<i>the historic urban spine of the Peninsula</i>' and includes actions to:</p> <ul style="list-style-type: none"> - investigate the reduction in traffic lanes - widen footpaths - calm traffic 	<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>

- rationalise bus stops
 - provide new pedestrian crossings
- Far from providing new pedestrian crossings as per the PPPS finding, the proposal actually reduces the number of crossings.

Request(s)

R3-9 TfNSW to respond to the identified discrepancies between the proposal and adopted policy/strategy.

3.5. Proposal undermines TfNSW's current multi-modal transport planning process for Pyrmont

Impacts of the proposal

TfNSW is currently developing the Pyrmont Ultimo Transport Plan (PUTP). This is the layer of planning to build on the adopted plans outlined in Section 3.4 to holistically address the transport needs of the area, including a fine-grained consideration of the potential opportunities on individual streets

The proposal provides a siloed, road 'solution' in the very precinct that TfNSW is purportedly working on a plan to address a complex, multi-modal, place-based problem.

Issue(s) with REF

The REF presents the proposal as if it is an isolated project without acknowledging the complex array of projects, plans and strategies that form the context to transport planning for the peninsula.

Proposal conflicts with Pyrmont Ultimo Transport Plan (under development by TfNSW)

TfNSW is currently developing the Pyrmont Ultimo Transport Plan (PUTP). One of the key drivers of this plan, as stated in the scope that was put to market, is to “*establish desired future road and street hierarchy maps for the network ... and prioritise road users on key corridors.*” The action plan associated with the PUTP is meant to guide all investment in transport in the area for the next 10 years.

Putting forward this proposal before the PUTP is finalised does not make sense. It locks TfNSW into prioritising private vehicles and jumps to solutions without considering the broader context and needs of the peninsula. As participants in the consultation for PUTP, the City has visibility of the PUTP objectives which were developed with stakeholder input. There are many glaring inconsistencies between the proposal and the PUTP objectives.

PUTP objective⁷

Relation to proposal

Discourage private vehicles and car parking, where appropriate, while enabling freight and servicing access supporting local centres

The proposal encourages driving and funnels cars onto local streets in Pyrmont.

⁷ Revised Objectives and Evaluation Criteria Sent by SCT Consulting to City on 28 June 2022

Reduce through traffic on local streets and improve walkability of key links to create	Harris St is most definitely a key link and yet the proposal reduces walkability by removing a signalised pedestrian crossing at Allen Street. Traffic on local streets will increase due to the increased capacity of the off-ramps.
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Improve the safety and attractiveness of active transport by reallocating road space and prioritising walking and cycling as the preferred mode for trips to, from and within the precinct	The proposal reinforces rather than solves the severance for people cycling north-south along Bulwara Road, a key cycle link. The proposal will prevent the reallocation of road space for people walking on Pyrmont Bridge Road.
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Reallocate space to facilitate Green Streets, increased tree canopy to create cooler urban environments and water sensitive urban design	The proposal achieves precisely the opposite, removing more than one-third of trees on Allen Street and Darling Harbour. Across the whole study area, the proposal will remove 10% of trees.
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In addition, the proposal will erode community support and trust in the NSW Government to coordinate integrated, multi-modal, place-based planning.

Request(s)

R3-10 TfNSW should put any proposal relating to the Western Distributor on hold until the TfNSW Pyrmont-Ultimo Transport Plan is completed.

3.6. The proposal will disrupt public transport in Pyrmont

Impacts of the proposal

The REF notes that modifications to the intersection of Bridge Road and Bank Street could necessitate changes to the route 501 bus service. It appears that changes will impact the ability of the eastbound route 501 buses to access stops on Miller Street and Harris Street (north of Pyrmont Bridge Road). It is unclear whether this would result in removal of related stops on westbound route 501 services (to maintain “legibility”).

During the construction phase, TfNSW indicated that there would also be impacts to the L1 light rail service.

Issue(s) with REF

Until Metro West opens in 2030-1, light rail and buses provide the only public transport connections to and from Pyrmont and Ultimo. These connections are vital. Recent changes to route 389 have already created community disquiet with reduced public transport connections to some areas of the city centre.

Disruption to light rail will cause impacts for communities across the inner west.

TfNSW has released concepts for improved bus connections to Ultimo and Pyrmont, presumably along Harris Street (in a manner consistent with the Place Strategy.) The proposal impacts the feasibility of operating these types of services.

Request(s)

R3-11 TfNSW to avoid impacts on existing bus and L1 light rail services and improve local public transport connections to Pyrmont and Ultimo.

3.7. WestConnex (Western Harbour Tunnel and WestConnex Stage 3) would better solve the cited issues

Impacts of the proposal

The proposal uses surface streets in Pyrmont to address a problem that TfNSW cites as a key justification for the proposal: to “*improve motorway operational efficiency and resilience, particularly in the event of incidents*”). This is the problem that WestConnex (Western Harbour Tunnel and WestConnex Stage 3) was designed to solve.

Issue(s) with REF

It is unclear why TfNSW is prioritising investment in this project, which will open only one year before Western Harbour Tunnel which is to serve a similar function. The [Western Harbour Tunnel project website](#) says:

“By creating a western bypass of the Sydney CBD, the Western Harbour Tunnel will take pressure off the Sydney Harbour Bridge, the Sydney Harbour Tunnel, Anzac Bridge and the Western Distributor Corridors to improve transport capacity in and around Sydney Harbour”.

The NSW Government has made a massive investment in WestConnex and Western Harbour tunnel motorways to provide a bypass to the Anzac Bridge and Harbour Bridge, diverting a significant portion of traffic from the Western Distributor (and from Harris Street, Bridge Road and Broadway). This proposal appears to duplicate current investment in the Western Harbour Tunnel and appears to be claiming many of the benefits claimed for the Western Harbour Tunnel in its investment appraisal.



Figure 3 Western Distributor Network Improvements duplicate purpose of Western Harbour Tunnel

Request(s)

- R3-12 TfNSW should stop investing in new motorway 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.
- R3-13 TfNSW must develop a surface road plan that reduces vehicles travelling through the Pyrmont peninsula. The plan should reallocate road space to people walking and cycling, in response to opportunities created by diverting vehicles away from the City centre via the WestConnex bypasses – City

3.8. The proposal results in unacceptable impacts to trees

Impacts of the proposal

The REF recommends removal of a total of 71 trees based on the Arboricultural Impact Assessment (AIA) prepared by Eco Logical Australia, dated 12 August 2022.

Issue(s) with REF

- The purpose of the AIA should be to assist with guiding the design and informing the REF in a way that advocates for the retention and protection of trees. Instead, the AIA for this project is based on assumptions and information provided by the client (TfNSW), which results in TfNSW recommending 71 trees for removal. It is therefore unclear how the AIA has meaningfully informed the REF when it is based on advice from the client.
- TfNSW has recommended several high retention value trees for removal despite the methodology in the report outlining that high retention value trees should be considered as a site constraint and that the design should be modified to ensure their retention and protection.
- The Arborist should have provided better guidance at this preliminary stage to assist with guiding the design in a manner that advocates for preserving trees rather than resulting in TfNSW recommending 71 trees for removal.
- The assessment in the AIA is not based on survey plans, concept plans or detailed plans. The report refers to several plans, but these are not included in the report as a cross reference to the claimed Tree Protection Zone (TPZ) encroachments or to support various tree removals.
- The report does not include any Tree Protection Zone calculations to support the removal of 71 trees to facilitate the proposal. The actual impact on the assessed trees based on the current information may be greater than assessed.
- The report indicates TfNSW assessed all trees greater than 3 metres in height. However, a preliminary review of the study area undertaken by City staff suggests that this has been selectively applied within several zones where trees have not been plotted or assessed in the report.
- The recommended tree removal does not comply with several objectives and provisions of the City's DCP and various Council policies. Sections 3.5.1, 3.5.2 and 3.5.3 of the Sydney DCP 2012 requires existing trees be protected, canopy cover be increased, improving the local environment, and reducing the effects of the urban heat island effect.
- The project will result in a loss of canopy cover and increased hard surface areas. There will be limited opportunities to increase canopy cover through replacement planting to compensate for the proposed tree removals. The City's Sustainable Sydney 2030-2050 Continuing the Vision includes the target that by 2050 there will be a minimum overall green cover of 40%, including 27% tree canopy cover. This target is further supported in the adopted Greening Sydney Strategy 2021, and in other policies and plans.

The loss of canopy cover from this area is an unacceptable outcome of this proposal, resulting in a detrimental impact on the community's health and wellbeing, along with an increase in the impact of urban heat.

The proposed tree removal will have a **negative impact on amenity** to residents and the community across an area which is already lacking canopy cover.

The City does not support TfNSW's proposal to remove high and medium retention valued trees. In addition, unacceptable impacts on the long-term viability of trees resulting from the project is also not supported.

Request(s)

R3-14 TfNSW must revise the Arboricultural Impact Assessment (AIA) so that it guides the design of the proposal in a way that preserves trees and meaningfully informs the REF, rather than

being based on TfNSW advice that results in the removal of 71 trees. TfNSW must consider high retention value trees as a site constraint, and modify any design to ensure their retention and protection.

- R3-15 TfNSW must ensure that the AIA provides Tree Protection Zones to support any tree removal.
- R3-16 TfNSW must ensure that the AIA includes any plans that are referenced.
- R3-17 TfNSW must ensure that the AIA assesses all trees affected by the proposal.
- R3-18 TfNSW should have regard to the controls in Section 3.5 of the Sydney DCP 2012 relating to urban canopy and tree management.

3.9. The proposed tree removal results in impacts to local biodiversity

Impacts of the proposal

The excessive loss of trees and other vegetation will impact the animals that live and use this area, particularly considering the heavy urbanisation and already limited vegetation in the area.

Issue(s) with REF

- The REF states that the ‘*vegetation within the proposal has been classified as Urban Exotic/ Native and no vegetation is classified as native PCT*’, with ‘*potential limited habitat present tree crevices, cavities under the existing viaduct and foraging opportunities in planted roadside vegetation.*’ While the City generally accepts this classification, there is still habitat value, with the Atlas of Living Australia showing that there are over 500 animal species known to live within 1km of the study site.
- The City has identified this area as a potential biodiversity corridor (pink and blue lines in Figure 4 below) and there are identified bush restoration sites within the area. In particular, the sandstone cliff face along Bank Street has potential habitat value for indigenous flora and fauna.
- The REF does not describe sufficient replacement for any lost trees and does not propose any revegetation works. This should be proposed in order to replace and improve the local vegetation. The REF refers to Transport’s Biodiversity Offset Policy, however this is unlikely to assist in providing meaningful green cover to the City.
- The subject area is very urban with fragmented vegetation with over 500 animal species. The proposed removal of vegetation will adversely impact these animals.

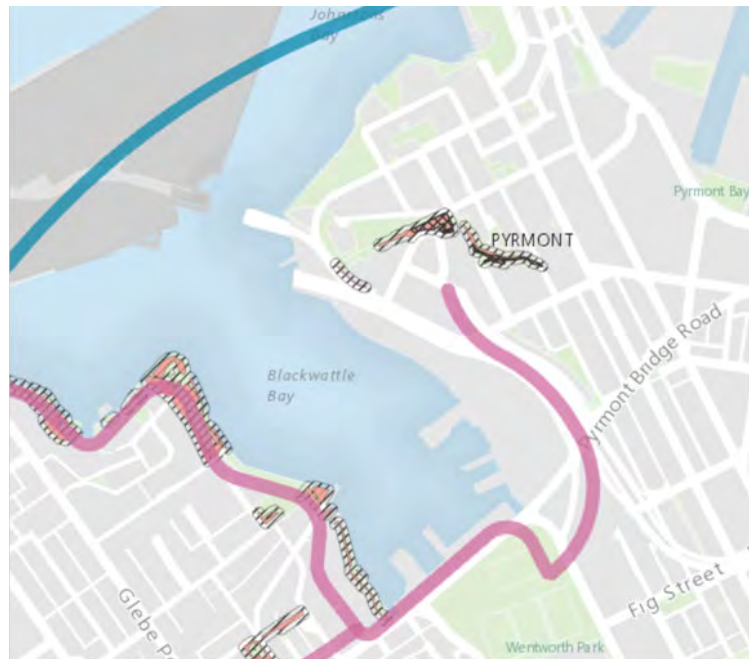


Figure 4 Biodiversity corridors identified by City (pink and blue lines)

Request(s)

R3-19 TfNSW should review their proposal to reduce the extent of tree and vegetation removal. Where removal is sufficiently justified, trees and vegetation must be replaced and improved by the proponent.

4. Allen St & Harris St Intersection – specific / local issues

4.1. Duplicating off-ramp and expanding intersection will increase traffic and impact on safety and place

This section deals with the specific impacts on safety and place that the widening of the Allen Street off-ramp and expanding of the intersection of Allen Street and Harris Street will have. Section 3.1 of this submission discusses the broader issues associated with the proposal.

Impacts of the proposal

Of particular concern are the removal of a pedestrian crossing on the Southern leg of the Harris and Allen St intersection and the expansion of the off-ramp at Allen Street. These changes will increase the volume and the speed of traffic in Pyrmont-Ultimo.

The proposal is being designed to accommodate access for 19m and 26 m B-double on off ramps.

Issue(s) with REF

The REF makes no assessment of impacts to safety and place caused by increasing number and speed of vehicles from off-ramps to surface streets (Pyrmont Bridge Road, Allen / Harris Street) but still asserts that there will be no impact to people walking and cycling. The City disagrees.

North -South cycling connectivity is significantly impacted by the Allen Street off ramp as it cuts across the Bulwara Road cycling connection. These impacts should be addressed.

Increasing traffic volumes will directly put at risk plans for increased development and improvements in place along Harris Street that rely on Harris Street being a vibrant and activated main street for the peninsula. Indirectly, the downstream impacts will jeopardise development around Central (including Central Precinct development and Central Square project idea) and the Broadway project idea.

Request(s)

- R4-1 TfNSW must acknowledge that the proposal will funnel additional traffic onto surface streets and assess the impacts.
- R4-2 TfNSW should commit to prioritising people over cars on surface streets in Pyrmont, notably Pyrmont Bridge Road and Harris Street. 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.

4.2. Duplicating off-ramp and expanding intersection will not solve motorway queuing / congestion

Section 3.2 of this submission covers key reasons why the widening of the Allen Street off-ramp and expanding of the intersection of Allen Street and Harris Street will not solve motorway queuing or congestion.

4.3. Impacts on Trees

This section provides the specific details of impacts to trees of the modification to the intersection of Allen Street and Harris Street. Section 3.7 provides a summary of issues / impacts to Trees caused by the overall proposal.

Impacts of the proposal

The Arboricultural Impact Assessment (AIA) identifies 31 trees being affected in Zone G (Allen Street/ Harris Street intersection). Of these, 11 trees are identified for removal.

According to the AIA, three trees (Trees 293, 294 and 295) '*will be subject to major encroachment from the intersection roadwork and utilities adjustments.*' The AIA goes on to state that another six trees (Trees 237, 296, 297, 298, 305 and 306) will require removal as they have '*major encroachments from the conversion of a parking lane to a traffic lane and remaining two trees (trees 315 and 316) subject to major encroachment from the intersection modification works including utility connections.*'

Issue(s) with REF

The City does consider that the proponent had provided evidence to require removal of trees in this location. The loss of the City's and the community's street tree assets in this location is not acceptable.

The City has the following issues regarding the AIA provided in the REF:

- The AIA indicates that the above recommendations are based on "client advice" and are therefore not based on an actual arboricultural impact assessment of the proposed plans, which is unacceptable.
- Further, the described intersection roadwork and utilities adjustments are a common occurrence throughout the City. Replacing, upgrading and/ or repairing utilities is done on a frequent basis and does not necessitate the removal of trees.
- The AIA also states that the 11 trees proposed for removal are 'in line with the worst-case assessment and assumes that the TPZ encroachment of all trees along Allen Street is major.' It is not clear how this conclusion has been made by the Arborist, given there are no plans to TPZ encroachment calculations included in the report.
- The Arborist indicates the basis for a Major Encroachment in the report is greater than 20%. As defined by AS4970, a Major Encroachment is greater than 10%. Therefore, information in the AIA is inaccurate and not consistent with AS4970.

Request(s)

R4-3 TfNSW should change its proposal to address the inaccuracies in their AIA and develop a plan to undertake intersection roadwork and utilities adjustments that do not remove trees.

5. Pyrmont Bridge Rd and Bank St Intersection – specific / local issues

5.1. Duplicating off-ramp and expanding intersection will increase traffic and impact on safety and place

This section deals with the specific impacts on safety and place that the widening of Pyrmont Bridge Road off-ramp and expanding of the intersection of the off-ramp and Bank Street will have. Section 3.1 of this submission discusses the broader issues associated with the proposal.

Impacts of the proposal

Of particular concern to the City are the expansion of the off-ramp at Pyrmont Bridge Road and the related replacement of the zebra crossing with signals. Requests 3-3 and 3-5 relate to these concerns. These changes will increase traffic in Pyrmont-Ultimo and reduce pedestrian priority in this location.

Pyrmont Bridge Road is an important east-west pedestrian spine across the peninsula, connecting the city centre, the metro station, and Blackwattle Bay. All of these will significantly increase volumes of walking, and Pyrmont Bridge Road's current footpaths do not even meet today's needs. Further degrading the pedestrian environment in favour of vehicle traffic compounds this problem and poses safety concerns for people walking and cycling.

Issue(s) with REF

The REF makes no assessment of impacts to safety and place caused by increasing number and speed of vehicles from off-ramps to surface streets (Pyrmont Bridge Road, Allen / Harris Street) but still (misleadingly) asserts that there will be no impact to people walking and cycling.

North-South cycling connectivity is significantly impacted by the Allen Street off ramp as it cuts across the Bulwara Road cycling connection. These impacts should be addressed.

Increasing traffic volumes will directly put at risk plans for increased development and improvements in place associated with the Blackwattle Bay and New Fish Market developments as well as the future Metro Station on Pyrmont Bridge Road.

Request(s)

Request 4-1 calls on TfNSW to acknowledge and assess the impacts of the additional traffic on surface streets.

5.2. Duplicating off-ramp and expanding intersection will not solve motorway queuing / congestion

Section 3.2 of this submission covers key reasons why the widening of Pyrmont Interchange off ramps and modifying the intersection of Bank Street and Pyrmont Bridge Road will not solve motorway queuing or congestion.

5.3. Impacts on Trees – Zone C (Bank St / Miller St)

Impacts of the proposal

The AIA assesses nine trees in Zone C: Bank Street/ Miller Street

Issue(s) with REF

The AIS excludes several trees at the intersection of Miller and Bank Streets. The rationale for only selective plotting of trees in this zone is unclear.

Request(s)

R5-1 TfNSW must undertake a complete assessment of trees in Zone C and all impacts on all trees.

5.4. Impacts on Trees – Zone D (Paradise Reserve/ Fish Market Light Rail and Carpark)

Impacts of the proposal

The AIA recommends removal of Trees 109 and 111 due to expected pruning.

The AIA recommends removal of nine Palms ((Trees 110, 112 to 118) in the Bank Street Central median. According to the AIA, this is to facilitate ‘widening infrastructure and construction methodology.’

The AIA identifies Trees 110 to 118 as having Medium Retention Value. The City has applied the STARS methodology (adopted in the AIA) and contests this undervaluation.

The AIA recommends removal of 22 Palms located at the intersection of Pymont Bridge Road and Bank Street (south-eastern corner of Paradise Reserve). The justification is ‘new pier placements and proposed stormwater utility adjustments (and potentially also electrical adjustments for Traffic Control Signal (TCS) changes)’.

Issue(s) with REF

The Arborist has formed the opinion that anything greater than 5% pruning is a ‘major encroachment’ and trees cannot be retained if pruned beyond this amount. The City disagrees with this assertion. The AIA includes no supporting information such as concept plans to support these recommendations or provide clarification on the meaning of “construction methodology”.

The City notes that the Arborist did not determine the retention value for the 22 palm trees located at the intersection of Pymont Bridge Road and Bank Street. **The report indicates TfNSW provided the undervalued retention value.** Under STARS methodology, the subject trees fit the criteria for Medium Landscape Significance.

Request(s)

R5-2 TfNSW should consider design alternative to protect the 22 Medium Retention Value palm trees located at the intersection of Pymont Bridge Road and Bank Street. TfNSW should consider these trees as a material constraint to the development.

5.5. Impacts on Trees – Zone E (Pymont Bridge Road Intersection)

Impacts of the proposal

The AIA assessed 24 trees his zone. The AIA proposes four trees for removal due to major encroachment due to modifications to the intersection.

Issue(s) with REF

The AIA includes no supporting information detailing the actual TPZ encroachment percentage and/ or plans showing the modifications proposed. It is unclear how this recommendation has been made.

Request(s)

R5-3 TfNSW should provide the information to support the recommendation for removal of 24 trees in Zone E.

6. New on-ramp from Fig Street – specific / local issues

6.1. Timing, cost, and complex construction for an issue that WestConnex should address

Section 3.6 of this submission discusses the broader issues associated with the fact that Western Harbour Tunnel would divert a significant proportion of traffic currently on the Western Distributor and reduce the cited issues relating to safety for westbound drivers.

This section outlines the key issues affecting the area

Impacts of the proposal

- The new Fig Street on-ramp would entail major, complex construction in a dense urban location and will impact thousands of residents and visitors. It is likely to cost in the hundreds of millions of dollars
- The majority of construction works for the project would be carried out outside of standard construction hours, to minimise disruption to the operation of the Anzac Bridge and Western Distributor. The impacts on residents and businesses will be after 6pm on weekdays and weekends.

Issue(s) with REF

- The Environmental Impact Statement for the Western Harbour Tunnel told us the project would address issues associated with traffic delays on the Western Distributor. It is unclear why TfNSW is pursuing the new Fig Street on-ramp rather than lower cost safety options, such as reduced speeds or improvements to signage.
- It is not clear why this investment needs to be constructed after the opening of the Rozelle interchange but before the opening of the Western Harbour tunnel.

Request(s)

- R6-1 TfNSW should delay any consideration of constructing the Fig Street on-ramp until after the benefits of WestConnex have been realised and demonstrate that the investment is required.

6.2. Inappropriate use of crash data for project justification

Section 2.5 of this submission outlines how TfNSW has presented crash data in a way that is highly unusual in order to justify the need for the proposal.

Impacts of the proposal

The REF “Need for the proposal” states that there are “there are currently over 100 crashes occurring per year. Without mitigation, any increase in traffic would add pressure to the road network and safety”. Our review of TfNSW crash data for the 14½ years between 2007 and 2021 identifies only 39 reported crashes (4 Serious injuries and one fatality, which occurred in August 2020) – an average of 2.7 crashes per year.

TfNSW advised that it “undertook specific camera surveys throughout October 2019... as part of these surveys, crashes and near misses were observed on a regular basis, averaging more than

twice per week. This correlates with the reported number of crashes and near misses on average per year in the REF.”

Issue(s) with REF

The safety assessment methodology using “near misses” is inaccurate and inconsistent with the nationally adopted methodology for the assessment of road safety risks use to identify road safety risk such as the Black spot program. The Black Spot program requires “a history of crashes (to) ensures that those sites that have a recurrent problem are targeted first for treatment”.

The proposal falsely claims there have been over “100 crashes occurring per year” and has additionally not provided alternative evidence that there is a significant risk to road safety. The City agrees that there is a long-standing merge issue on the Western Distributor, however serious injuries and fatalities over the past fifteen years in this location are low, especially considering over 100,000 vehicles use the motorway per day. Any investment in the proposal at this location is at the expense of other locations where there is crash data provides evidence of greater road safety risks (when corrected for vehicle movements).

Request(s)

Section 2.5 outlines requests related to the use of road safety data to justify investment the new Fig Street on ramp.

6.3. Misleading engagement material: Fig Street on-ramp does not solve the identified weave issue

Impacts of the proposal

The proposal will not materially address the safety issues claimed in the engagement material ([fly-through video](#))

Issue(s) with REF

TfNSW has mislead the public as to the benefits of the proposed Fig Street on-ramp in the fly-through video on its project web portal. See Figure 5, below

TfNSW justifies the new Fig Street on-ramp based on its potential to address safety concerns on the Western Distributor. The fly-through video indicates that the proposal would resolve the cited ‘*current dangerous weave*’ that is the result of vehicle traffic from the Pymont Street on-ramp (heading east, shown in **green**) crossing with traffic from Anzac Bridge (heading east, shown in **yellow**). **This is not the case.**

The proposed new Fig Street on-ramp would only address weaving traffic from Fig Street / Harris Street (heading east, marked in **red**, by City). The proposed Fig Street on-ramp is only accessible from Fig Street / Harris Street. It is unclear how it will help reduce the safety risk associated with traffic coming from the Pymont Street on-ramp. This traffic would still need to cross multiple lanes to be able to access the Harbour Bridge

Figure 5 Misleading engagement material from TfNSW web portal



6.4. Impacts on Trees

Impacts of the proposal

Zone J: Pyrmont Street/ Darling Drive

The AIA has assessed 31 trees within this zone, the new ramp will directly impact one tree identified for removal. This tree (Tree 381) is identified as being a General Biosecurity Risk under the *Biosecurity Act 2015* and should be removed to prevent further spread.

Zone K: Darling Harbour

The AIA has assessed 31 trees within this zone. 11 trees (Trees 387 to 394 and 400 to 402) are subject to major encroachment as they are directly impacted by the proposal and will be removed. Eight Cabbage Palm Trees (Trees 387 to 394) have high amenity value and are listed on the City's Register of Significant Trees.

Issue(s) with REF

The City has no objection to Tree 381 tree being removed.

For trees currently growing under the overpass, it is unclear why removal is required, as no work is proposed around them.

Request(s)

R6-2 The proponent should provide evidence that:

- removal of trees has considered only when all other alternatives have been exhausted.
- impacts to trees have been minimised and develop a plan to locate construction sites and undertake utilities work in such a way as to avoid all tree removal.
- given their high amenity value, the AIA recommendation regarding the eight Cabbage Palm Trees (Trees 387 to 394) will be translocation given their high amenity value if all other alternatives have been exhausted. These trees are listed on the City's Register of Significant Trees.

7. Gantries – specific / local issues

7.1. Proposed gantries will be visually intrusive

Impacts of the proposal

The proposal includes three gantries on the Anzac Bridge deck, in addition to three gantries TfNSW is delivering through other processes. These gantries will span the width of the bridge deck and will be around 6 metres above the deck. The REF describes the heritage impacts as “Moderate adverse impacts on the Anzac Bridge via the installation of new gantries”.

As stated in the Statement of Heritage Impact (SHI), the proposed gantries will detract from the original design qualities, heritage attributes and aesthetic integrity of the Anzac Bridge structure.

Issue(s) with REF

The proposed gantries will impact on the aesthetic quality and heritage attributes of the Anzac Bridge and will cause visual impacts for surrounding areas (existing and planned development).

Request(s)

- R7-1 TfNSW must develop further details of the design of the gantries, as the Statement of Heritage Impact (SHI) recommends.
- R7-2 TfNSW must demonstrate, in accordance with the SHI, that the gantries better complement and insofar as possible blend with the high-quality design and modern, minimalist detailing of the Anzac Bridge; and do not detract from the uninterrupted volume of the Bridge.

7.2. Proposed gantries do not represent an integrated “Smart Motorway” approach

Impacts of the proposal

The City supports Smart Motorway technology to improve the efficiency and safety of a motorway by managing traffic flows. The REF indicates, however, that the gantries would only provide variable speed signage, which is the most basic form of Smart Motorway Management. The proposal does not identify other more effective approaches such as ramp metering.

Issue(s) with REF

- The REF provides little clarity on the role of proposed gantries in managing traffic. For example, the REF provides no information on how the gantries might assist future traffic changes on Anzac Bridge, such as any resulting from the NSW Government’s proposals for a rapid busway on Victoria Road (Six Cities Discussion paper, 2022.) The proposal does not include assessment of extending this bus lane to the City to improve bus reliability.
- The proposal does not include ramp metering. There have been significant benefits from Smart Motorway investments on the M4 Motorway with ramp metering.

Request(s)

- R7-3 TfNSW must explain how the proposal will use the Smart Motorway gantries to improve the efficiency and safety of a motorway, and why it considered this option preferable to the

City of Sydney Submission to Western Distributor Network Improvements proposal

Pymont Place-based Transport Study recommendation to rationalise and remove accesses. TfNSW should make available any assessment of ramp metering options.

R7-4 TfNSW must explain why it did not consider improving bus priority from Victoria Rd to the City and Pymont as part of the proposal.

8. Construction compounds and other areas

8.1. Establishing construction compound should not require removal of trees

Impacts of the proposal

Zone I - Jones Lane

The AIA assessed 42 trees have been assessed in this zone and proposed eight trees for removal to facilitate a site compound.

Zone B: Bank Street (Glebe Island Bridge)

The Glebe Island Bridge is to be used as a construction compound and 11 trees are assessed in the AIA in this zone. The Arborist indicates that existing hard surface area will be utilised, and no earthworks are proposed. Therefore, it is assumed that all trees will be retained.

However, vehicle access may require pruning of trees in this area. An assessment of the extent of pruning required has not been undertaken in the AIA and it has been assumed that more than 5% pruning of Trees 8 and 9 would be required.

Issue(s) with REF

The trees within this area are directly adjacent to a multi-storey apartment building and provide privacy and a buffer from the Western Distributor. The proposed removal of these trees for a temporary construction compound would be an unreasonable impact on the amenity of local residents and the community which currently access this parcel of land.

Request(s)

- R8-1 TfNSW should design the construction site compound at Bank Street (Glebe Island Bridge) to avoid the need for tree removal or alternative locations should be considered that would avoid the need to remove trees. The removal or extensive pruning of healthy trees of high to medium retention value for the purpose of a temporary construction feature **is unacceptable and is not supported by the City.**
- R8-2 TfNSW must ensure that the REF clarifies if any additional trees in the location of the construction site compound will be pruned or removed.

8.2. Impacts to the setting and character of adjoining areas

The proposal will impact the surrounding areas e. This will have additional impacts on the setting and character of the adjoining areas in Pyrmont and Ultimo, which are already adversely affected by the Western Distributor.

Request(s)

- R8-3 TfNSW must consider the impacts on the setting and character of Pyrmont and Ultimo in the context of proposed traffic network improvements and must comply with recommendations and mitigations on page 6 of the SHI.

