

Thank you for the opportunity to make a submission on the Sydney Gateway EIS.

Conclusion: the Sydney Gateway project should not be approved until it meets its stated benefit for Sydney, “to make it easier, faster and safer to get to the airport” for *all* customers, because in its current form it does not comply with NSW Government policies and plans, as detailed below.

Though the project does proudly provide an active transport link along the Alexandra Canal, the EIS disingenuously calls this “new”. In fact, it is merely a slightly less direct replacement for the existing direct path along the Alexandra Canal built by RMS as a consent condition for the original M5East in 2001. The “new” path was “*warmly welcomed by bike users and walkers*” (EIS page i of Appendix E) because it is better than the complete obliteration of the existing path as the project originally proposed.

The project provides no active transport link to the airport domestic terminal, despite the project objective “to make it easier, faster and safer to get to the airport”, impacting the many airport staff and others who currently cycle or walk, as well as permanently disadvantaging active modes, which is counter to NSW Government policies and plans.

Current NSW Government policies and plans unfulfilled or undermined by the current proposal include: *Future Transport 2056* (2018), *Greater Sydney Services and Infrastructure Plan* (2018), *Building Momentum State Infrastructure Strategy 2018-2038* (2018), *Greater Sydney Region Plan – A Metropolis of Three Cities* (2018), *NSW Principle Bicycle Network*, *Greater Sydney Green Grid*, *South East Sydney Transport Strategy*, and the *Health Impact Assessment Guidelines* (2017). At national level, it is inconsistent with the *National Infrastructure Priority List* (2019) and the *Airports Act* which requires major developments to be consistent with the airport’s final master plan.

Interestingly, when Infrastructure NSW reviewed the project Final Business Case the top recommendation was for the Sydney Gateway team to do an “assessment of the active transport and urban design outcomes early in the design refinement phase for incorporation into the planning approval process”. Despite this advice early in the project, the Sydney Gateway team has failed to make an active transport connection to the airport in the current proposal. The Final Business Case for Sydney Gateway shows that more than half of the project benefits rely on travel time savings, despite increasing evidence that travel time savings do not materialise, or, at best are short lived, for road projects due to induced traffic.

The EIS is required to show how the project is aligned with relevant government plans and strategies. The current proposal should be amended to support and be consistent with the following plans and strategies. It should not be approved without amendment to include an active transport link to the airport.

Future Transport 2056 (2018)

The EIS claims “The project is consistent with the [Future Transport 2056] strategy, as it would provide for new high-capacity road connections, strengthening the linkages between Sydney Airport and Sydney’s strategic road network. It would support safe, efficient and reliable journeys for people and freight.” But, without providing a safe active transport connection to the airport, the current proposal is in fact in conflict with the Future Transport Statewide Outcome Measures, including “increase the number of people able to access centres by walking, cycling and using public

transport”, increase “the % of the population within Greater Sydney with 30 minute or less access to their nearest strategic centre by public or active transport”, and reduce “fatalities and serious injuries across the road and transport network”.

Greater Sydney Services and Infrastructure Plan (2018)

The Greater Sydney Services and Infrastructure Plan has more detail on the Future Transport Outcomes, specifically for Sydney. The plan says, “Our focus is on enabling people and goods to move safely, efficiently and reliably around Greater Sydney... Achieving this will require more efficient modes of transport – public transport, shared transport and walking and cycling – to play a greater role”. But without a safe active transport connection to the airport, this current Sydney Gateway proposal does not make it possible to have more walking and cycling to the airport. The Greater Sydney Services and Infrastructure Plan talks of public transport, walking and cycling playing a greater role, and says, “Without this, our roads will become more congested and journey times and reliability will continue to deteriorate.” Yet the Sydney Gateway EIS proposes to suppress walking and cycling to the airport *and* still reduce journey times. The Greater Sydney Services and Infrastructure Plan says, “Our future networks and initiatives are designed to support this outcome by expanding and improving public transport and ensuring more efficient forms of transport are prioritised”, except, it seems, on this NSW Government project, as currently proposed with a missing active transport link to the airport.

Customer Outcome 3 is “Walking or cycling is the most convenient option for short trips around centres and local areas, supported by a safe road environment and suitable pathways”. The current proposal for Sydney Gateway, without an active transport link for workers and others to get to the airport, undermines this customer outcome. Thousands of airport workers live within 10km (the Plan’s definition of a short trip).

Customer Outcome 9 is “A safe transport system for every customer with the aim of zero deaths or serious injuries on the network by 2056”. It says, “To ensure safe mobility for all customer and freight travel, safety outcomes will be built into our future new and upgraded infrastructure and services. Principles to guide this include... separation of different transport users to improve safety, freight efficiency and promotion of active travel”. The current Sydney Gateway proposal fails to comply with this safety outcome. Another principle listed is, “Encourage modal shift away from private vehicle usage and towards public transport modes”, but the Gateway project, by making driving faster, will only do the opposite.

Customer Outcome 12 is “A resilient transport system that contributes to the NSW Government’s objective of net-zero emissions by 2050”. Again, by encouraging car dependence and suppressing zero-emission modes from being used to access the airport, the current Sydney Gateway proposal does the opposite of this customer outcome. The Plan explains measures adopted include, “Planning services and infrastructure to improve the attractiveness of more sustainable modes of transport, including public transport, walking and cycling.” This should include the Sydney Gateway project. Without a safe active transport connection to the airport, Sydney Gateway will undermine, rather than contribute to, the measure for this outcome, of “mode shift from private motor vehicle to active and public transport”.

The Plan also says, “Walking and cycling will have an important role in the future centre-serving network for shorter trips. More than 11 million weekday car trips in Greater Sydney are less than 10km. Two in five bus trips are less than 5km in length. These short trips contribute to congestion on the already constrained parts of the transport network typically in centres. Lack of access to safe

cycling paths is a barrier for the 70 per cent of customers who tell us they would like to cycle more for short trips and would do so if they felt safer and more confident. Connected cycling networks within 5kms of strategic centres will improve the access to cycling for short trips. Many of these connections will also form part of the Principal Bicycle Network, allowing cycling customers to travel between centres across Greater Sydney. The Principal Bicycle Network will also be designed to integrate with the Green Grid...” but the current proposal for Sydney Gateway fails to provide this part of the Green Grid.

Building Momentum State Infrastructure Strategy 2018-2038 (2018)

The EIS notes that the State Infrastructure Strategy is concerned “Rising congestion on parts of the road network will increase travel times and affect the reliability of the freight network”, as if the statement supports Sydney Gateway’s proposed solution. In fact, the State Infrastructure Strategy’s response to increasing congestion is calling for “Using the road network more efficiently” and points out that “private vehicle traffic with low vehicle occupancy is far less efficient at moving people than public transport” (page 132). It goes on, “To protect the amenity that Sydneysiders prize so highly, available road space will need to be used more efficiently. Reallocating road space in key corridors to more efficient and sustainable modes is critical – modes such as light rail, buses and active transport”. The State Infrastructure Strategy has five geographic recommendations for the Eastern Harbour City – one is “improve access to international gateways” but another is “improve active transport”. Sydney Gateway’s current proposal fails to address the latter in the project.

The EIS section on health impacts fails to address the State Infrastructure Strategy statement on page 168, “The planning, design and development of places and neighbourhoods should be geared to improving health outcomes through the provision of walking, cycling and active recreation opportunities”. The current proposal fails to do this.

Greater Sydney Region Plan – A Metropolis of Three Cities (2018)

The Sydney Gateway project could, but in its current form fails to, provide a part of the Green Grid along its alignment.

Health Impact Assessment Guidelines (enHealth, 2017)

The SEARS include 15.1, “The Proponent must assess the potential health impacts of the proposal, in accordance with the current guidelines”; 15.2 (c) “assess the effect of the proposal on other relevant determinants of health such as the level of physical activity...”; 15.2 (d) “assess the opportunities for health improvement” and 15.2 (g) “discuss how, in the broader social and economic context of the proposal, the proposal will minimise negative health impacts while maximising the health benefits.”

The Health Impact Assessment Guidelines, in relation to transport projects (on page 18) point out “Car dependence has been identified as a contributor to sedentary lifestyles and growing rates of overweight and obesity in Australia, both well-known risk factors for cardio-vascular disease and several cancers.” And “Opportunities to increase physical activity through the provision or support of a less car-dependent workforce and community and increased options for active transport should be incorporated”. The guidelines have a Question Guide starting on page 53 that includes:

- Will there be any increase in respiratory health disease (e.g. asthma) from any changes in air quality?
- Will the development encourage/discourage healthy forms of physical activity such as walking or cycling?

The EIS Technical Working Paper 4 on Air Quality impacts is flawed in its assessment of the air quality impacts on health. For example, it does not consider the wider increase in pollution emissions from induced traffic across the road network from induced traffic caused by the proposed project. It also uses flawed assumptions such as “The changes in emissions associated with the project in a given year would be much smaller than the underlying reductions in emissions from the traffic over time as a result of improvements in emission-control technology”, ignoring recent research by the International Energy Agency that emission-reduction advances are being cancelled out by the increase in larger and less fuel efficient vehicles in the fleet from the increasing popularity of SUVs, a pattern also evident in Australia.

The EIS assertion that “Improved travel times and access, which may help improve general health and wellbeing. Without the project, worsening traffic conditions, traffic and accident risks could result in increased levels of stress and fatigue leading to potential health impacts” is laughable given the strong local and international evidence for induced traffic. The project is far more likely to increase congestion, locally and across the network, as it induces more car travel over time, thereby adding to stress and fatigue health impacts.

Despite the Health Impact Assessment Guidelines clearly requiring the impact on physical activity, including walking and cycling, to be considered, the EIS fails to address this, instead saying that the only impact on physical activity levels will be during construction only (page 23.5). The proposal’s failure to include an active transport connection to the airport does constitute a failure to encourage walking and cycling and must not be left out of the Health Impact Assessment. With this omission, the EIS fails to be in accordance with the Guidelines and so also fails to comply with SEAR 15.1.

NSW Principle Bicycle Network

The NSW Government Principle Bicycle Network (PBN) has a tier one route between the Alexandra Canal and Wentworth Avenue, along the alignment of Airport Drive, though the PBN recognises the change of the cycleway to the northern side of the canal resulting from Sydney Gateway. The current Sydney Gateway proposal should not be approved if it fails to deliver this PBN link and potentially makes it impossible to deliver in the foreseeable future.

Greater Sydney Green Grid

The Greater Sydney Green Grid also shows a route between the Alexandra Canal and Wentworth Avenue, along the alignment of Airport Drive (figure 54 on page 169 of the Greater Sydney Region Plan). The current Sydney Gateway proposal should not be approved if it fails to deliver this Green Grid link and potentially makes it impossible to deliver in the foreseeable future.

South East Sydney Transport Strategy

The NSW Government South East Sydney Transport Strategy also shows a route between the Alexandra Canal and Wentworth Avenue, along the alignment of Airport Drive. The current Sydney Gateway proposal should not be approved if it fails to deliver this SESTS link and potentially makes it impossible to deliver in the foreseeable future.

National Infrastructure Priority List (2019)

The EIS points out “the Infrastructure Priority List is designed to give guidance to decision makers” (Appendix F). Sydney Gateway is included in the list as a high priority near term (0-5 years) initiative on the list, as is the “Active transport (walking and cycling) access to Sydney CBD” project on page 79 of the list. It has been on the List since 2016 and includes a cycleway between Alexandra Canal and

the domestic terminal running along the southern side of the freight rail line. It would be unwise for decision makers to allow one National Infrastructure Priority List project to be built in a way that prevented another, also 0-5-year initiative, from being built. Sydney Gateway must include construction of this link before being approved.

Airports Act which requires all development to be consistent with the airport's final master plan.

Building Sydney Gateway, as currently proposed, without an active transport connection for staff, travellers and visitors to access the domestic terminal by cycling or walking, conflicts with 11 of the 12 Master Plan 2039 objectives. It undermines Sydney Airport's stated (on page ES-8) ambition "to be an industry leader in sustainability" if its staff are prevented from walking or cycling to work and it could impact Sydney Airport's Green Star Communities rating since footpaths are a minimum requirement. It effects the ability to promote a healthy workforce and ensure the safety of its workers. It undermines other investments Sydney Airport has made in improving cycling and walking infrastructure to encourage staff to cycle and walk.

The Master Plan 2039 says, "Sydney Airport is committed to improving active transport infrastructure in the precinct" – making the proposed Sydney Gateway without an active transport link to domestic in conflict with the Master Plan. It goes on to say "We work collaboratively with the NSW Government to ensure alignment between objectives and planned projects to improve road function, capacity and journey times for all users". But all users have not been catered for with Sydney Gateway as currently proposed.

The Master Plan section on traffic modelling points out "if the [station] access fee were reduced or removed, an additional shift to rail could be expected with a likely positive impact on the performance of the road network" but it is unclear whether the Sydney Gateway Strategic Business Case or Final Business Case included a full range of options in the options assessment – there is only a reference to road alignment options in the Final Business Case summary by Infrastructure NSW.

The Master Plan 2039's Five Year Ground Transport Plan (2019 – 2024) includes the objectives, "Reducing the dependence on single occupant or purpose vehicle transport for travel, by promoting active movement within the community and the use of public transport"; and "Creating efficient pedestrian, bicycle and vehicle linkages internally and connections to surrounding urban development". These objectives conflict with the missing active transport link in the current Sydney Gateway proposal.