



INNER WEST COUNCIL

**SUBMISSION FROM INNER WEST COUNCIL
TO THE DEPARTMENT OF PLANNING, INDUSTRY & ENVIRONMENT
OPPOSING THE PROPOSED WESTCONNEX STAGE 3 (M4-M5 LINK – ROZELLE
INTERCHANGE) - SSI-7485-MOD-2**

SEPTEMBER 2019

1 Strategic issues

Inner West Council has a long-standing position of opposing inner-city motorways such as WestConnex, preferring public and active transport solutions to Sydney's traffic problems. Modification 2 expands the footprint of WestConnex and is opposed by Council. Council is also concerned that one of the major justifications for the modification is access to a possible future motorway project (the Western Harbour Tunnel (WHT)) that is also opposed by Council and has not yet been approved.

Furthermore, the inner west community was always assured by the NSW Government that the entire Rozelle/Lilyfield interchange for the M4-M5 Link would be located in tunnels underground. The construction of this overpass betrays a very significant promise to the inner west community. Council opposes the construction of this overpass.

As has been stated in all of Council's prior WestConnex submissions, traffic reduction through new and improved public and active transport is a far more effective means of addressing traffic congestion and improving transport efficiency than expanding road capacity through motorway construction. It is recognised throughout the world that motorway construction in large cities with growing populations is futile as it ultimately leads to increased congestion because of the phenomenon of induced traffic.

Rather than plan for possible future motorways such as the WHT, Council urges the NSW Government to 'draw a line in the sand' on motorway projects and pursue future-focused transport planning such as: demand management to reduce driving trips; improved public and active transport; transit-oriented development; and modest targeted improvements to optimise the existing road network.

In prioritising motor vehicles over other forms of transport, the modification contravenes a number of NSW Government and Council strategic plans including the Roads & Maritime Services (RMS) *Corporate Plan 2018-2021* and *Going Places*, Council's 2019 draft Integrated Transport Strategy which calls for reduced car dependency, improved transport integration and improved liveability.

Justification for the modification appears to be based on the need for freer flowing traffic as reflected in the Levels of Service of various intersections, particularly the intersection of The Crescent/City West Link/future tunnel portals. With the exception of the *number of stops* all other network performance measures show an improvement of 1% or less, with the PM peak indicating that even the *number of stops* increases against the non-modified project network measures. The network outcomes achieved by the modification do not justify the modification or its many detrimental impacts. In addition the overpass road would remove opportunities to connect communities with ferry services under consideration at the eastern end of Chapman Road and bus services accessing James Craig Road and remove the ability to provide seamless connections with a future West Metro station.

WestConnex should never have been approved and this modification should not proceed. There are no significant benefits proposed and it imposes significant and further negative impacts on the Inner West community.

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2 Urban design & visual impacts

The proposed vehicle overpass and other elevated structures pass close to the Annandale Heritage Conservation Area, Rozelle Bay and surrounding parks, creating significant adverse visual impacts on this otherwise attractive low-rise residential area.

WestConnex has been promoted as underground infrastructure and the construction of an above ground overpass would negatively affect the visual outlook from homes, the public domain and Rozelle Bay foreshore. Views to Rozelle Bay from the land bridge would be blocked by the vehicle overpass. Fencing and other structures would visually obstruct the view to Rodney Monk's iconic community mural which has been nominated for heritage listing on the wall along The Crescent. Additionally, the installation of acoustic barriers and throw screens on the land bridge, shared user bridge and vehicle overpass will significantly disrupt water and parkland views from numerous existing and likely future vantage points.

The extent of landscaping proposed on the land bridge originally proposed in the EIS has been reduced in the modification to accommodate the new vehicle overpass. As discussed further below, walking and cycling connections would be illegible and difficult to navigate. The elevated structures significantly reduce opportunities for place-making within the parks as they are not sensitive to the local context. This would diminish the general sense of safety and security for people and walking and cycling.

The modification considerably changes the design intent of the approved design and yet no substantial or peer reviewed urban design analysis has been made. The approved (EIS) design provided a clear link between the Rozelle Rail Yards (RRY) recreation area and the Rozelle Bay foreshore and the light rail stop. The report by the Department of Planning prior to EIS approval states that *"the greatest visual change resulting from the project will be the transformation of the Rozelle Rail Yards from a disused parcel of land into up to 10 hectares of accessible and valuable open space for the local community"*. The modification would undermine the already limited urban design benefits of the EIS design.

3 Active transport impacts

The modification does not provide the same standard of walking and cycling access as currently approved. The active transport links proposed reflect a misunderstanding of the nature of walk/cycle routes in the area and does not prioritise the need for direct, well-connected walk/cycle links.

RMS states in its *Corporate Plan 2018-2021* that its customers include walkers and cyclists as well as motor vehicles. However by worsening conditions for walkers and cyclists, the modification shows that RMS is again prioritising motor vehicle customers. The approved design provides an easy connection to both the light rail stop and Glebe foreshore but the proposed walk/cycle links are fitted-in around the vehicle overpass resulting in longer travel distances, steep climbs and long delays for people walking and cycling. The fact that these walk/cycle links will be elevated in places and against widened roads carrying high volumes of fast moving traffic means that walk/cycle conditions will be unpleasant and potentially hazardous.

Data included in the modification report shows that people in the Inner West Council area walk significantly more than the metropolitan Sydney average. The Greater Sydney Commission has a number of policies and actions which aim to make walking more convenient, but this is being undermined by this NSW Government project that will worsen walking conditions.

A significant active transport issue raised by the modification is the addition of extra road crossings at The Crescent. Currently people can walk directly between North Annandale and open space at Rozelle Bay via a single crossing. By adding a further crossing points each with separate signal cycles, the modification will significantly increase the time and distance taken to cross The Crescent, imposing a significant barrier



INNER WEST COUNCIL

between residential areas and parks and recreational facilities. Again, RMS's bias is apparent, sacrificing walk/cycle levels of service to improve levels of service for motor vehicles.

Concern is particularly expressed regarding:

- Real and perceived personal safety on the shared user bridge;
- Circuitous access to cross The Crescent to reach the foreshore resulting from the removal of direct active transport links and creation of a convoluted route requiring the use of four crossing points;
- Lack of direct, grade separated access from Annandale North to the Foreshore (as proposed in the EIS);
- Removal of direct active links to facilities on the foreshore including the new skate park and playground, isolating the community, the foreshore and, ultimately, the proposed Bays Precinct revitalization.

4 Noise & vibration impacts

Neighbourhoods across the Inner West LGA have endured significant ongoing construction impacts from WestConnex since 2016. The impacts have been particularly acute where there have been night-works. The extent of this impact has been outlined in all of Council's submissions, including Council's submission to the 2018 Parliamentary Inquiry into WestConnex. By expanding the motorway's footprint, the modification will impose additional construction noise and vibration impacts.

It must be recognised that from Council's experience with Stages 1 and 2, residents have found that construction impacts are intolerable, even with so-called 'good practice' and full compliance with conditions of approval.

In these earlier stages, residents experienced ongoing night-works as well as a number of unanticipated impacts from utilities works outside the project scope, and from construction equipment such as temporary generators and ventilation fans. Because of the modification there will be an estimated 19 additional households that will experience disturbed sleep from construction noise.

The modification will also result in additional operational traffic noise from the elevated vehicle overpass. The modification assesses this additional noise as being minor given the existing high levels of traffic noise in the area however, the cumulative traffic noise impacts must be considered to ensure that people's critical thresholds for traffic-noise tolerance is not exceeded.

The WestConnex parliamentary inquiry found the noise mitigation measures offered by RMS have been "*wholly inadequate to substantially reduce heavy construction noise*" (Inquiry Finding No.14). In June 2019 Inner West Council wrote to the Minister for Transport asking for voluntary property acquisition to be offered to residents experiencing excessive noise disturbance. RMS should ensure this option is provided for new residents affected by this modification.

Should RMS choose to counter this problem with higher, more effective noise barriers on the elevated structures their visual intrusiveness would be amplified.

5 Operational traffic impacts

It has already been noted that it is well recognised that attempting to solve traffic congestion by continually expanding road capacity is futile. The modification's own traffic analysis illustrates this point. It shows the addition of capacity at the intersection of The Crescent and City West Link Road will improve traffic flow (level of service) at that point. However, by moving more traffic through that intersection, congestion problems will be created at other points in road network.

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The modification explains that motorists will join the end of other traffic queues waiting to enter the CBD and to cross Sydney Harbour Bridge. The network modelled for the modification will perform similarly (or only slightly better) during peak periods, but will perform worse at other locations, with public transport travel times lengthened during peaks. In particular, the traffic performance of the intersection of Darling Street and Victoria Road is forecast to worsen for all scenarios.

Analysis provided suggests that, in 2033, the modification will result in a Level of Service “C” rather than “F” at the Johnston Street/The Crescent intersection, however no analysis is apparent regarding the potential increased traffic volumes that may consequently divert to Johnston Street, nor is there analysis of the likely impacts of such traffic on Annandale neighbourhood centre (Johnston Street/Booth Street). Adding to this is the potential for through-traffic into local streets in Annandale, Forest Lodge, Glebe, Lilyfield and Rozelle as motorists search for short-cuts.

By 2040 Sydney is predicted to have a population of 8 million. It is apparent that the growth in travel demand associated with this extra population cannot be absorbed with more private car travel. Determined action needs to be taken now to reduce private car travel and for existing road infrastructure to be optimised for use by the growing freight/logistics demand. This must be combined with construction and improvement of public transport and active transport networks.

6 Air quality & groundwater impacts

The additional impacts on air quality and groundwater predicted by the modification are dismissed as insignificant, despite assessments showing that more homes would experience increased emissions, and more contaminated spoil would be exposed. With a growing population and major road infrastructure projects planned and underway throughout Sydney, people will be increasingly exposed to potentially hazardous levels of air pollution. The NSW Government should not continue its program of rolling out motorways encouraging more private vehicle travel whilst ignoring deteriorating air quality and a rise in ecological impacts.

7 Conditions to be imposed if the modification proceeds

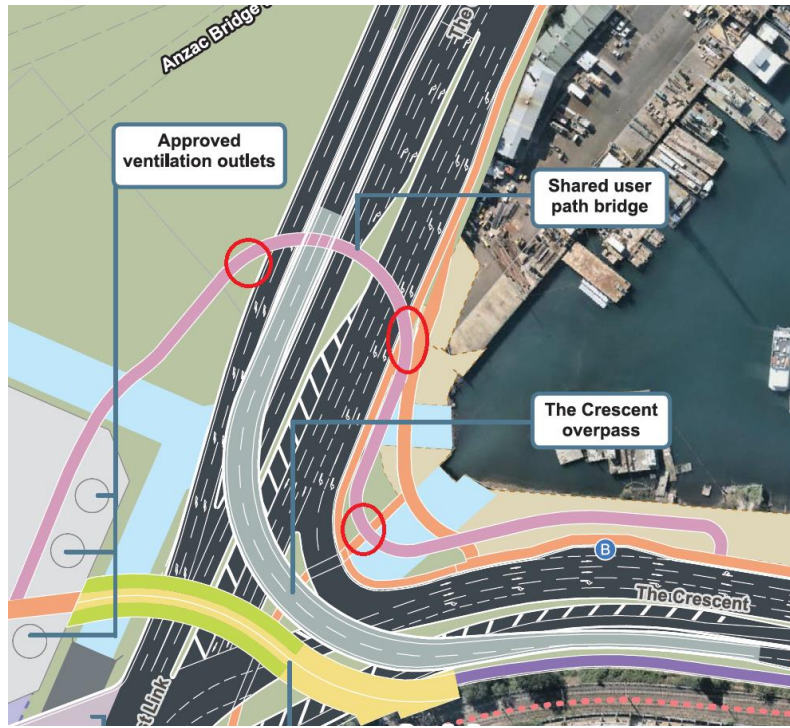
As stated above, Council opposes the modification. Should the modification proceed, Council requests the following conditions apply:

1. Inner West Council to be represented on the Design Review Panel required to be formed according to Condition of Approval E129.
2. Bicycle lanterns to be incorporated in all new signalised intersections.
3. Traffic signals proposed at the intersection of Johnston Street, The Crescent and Chapman Road at North Annandale be programmed to favour walk/cycle demands over motor vehicles – to respond immediately when a pedestrian or cyclist seeks to cross (demand responsive activation).
4. The shared path linking the former Buruwan Park and Johnston Street, beside the community mural, be maintained and widened.
5. All shared paths adjacent to roadways be buffered with the installation of mature trees and landscaping providing shade and pollution filters.
6. A new section of shared path be provided along The Crescent, adjoining the existing timber business and beyond the bridge piers - connecting Chapman Road and the City of Sydney's soon-to-be-constructed path at the pedestrian refuge and ramp.
7. On the proposed shared user path, stairs be provided to minimise unnecessarily long and circuitous walking distances and provide an opportunity for people to exit the overbridge quickly and gain the attention of passing motorists if they feel unsafe.



INNER WEST COUNCIL

Suggested stair locations are shown below and should account for future pedestrian movements resulting from revitalisation of the Bays Precinct. The connections should be legible and direct to provide faster walking access for people who can use them.



8. The supports and footings of all elevated structures are not to stand on footpaths or verges.
9. The Crescent Mural be illuminated and signage or a plaque be installed acknowledging the artists by name.
10. The modification not preclude future bus services. The final traffic arrangements are to cater for bus access to all roads via all movements at all intersections.
11. Bicycle parking with weather protection be provided on the land bridge adjacent to the Rozelle Bay light rail stop.
12. As reflected in Figure 4-1 (page 4-3) of the modification, a path be provided to allow people to walk and cycle between The Crescent and Railway Parade (similar to the connection now provided by the path through Buruwan Park).
13. The land bridge linking the light rail stop and future RRY recreation area to accommodate mature trees providing shade and amenity; accessible walk/cycle path at least 5m clear width; weather protection for passengers adjacent to the light rail stop; all-weather rest areas, planter boxes or other soft landscaping on the part of the land bridge adjacent to the light rail platform.
14. The shared use path is at least 6m wide providing physically separated access for people walking and cycling.
15. The overpass roadway is constructed to accommodate two traffic lanes only, with no potential for increased traffic capacity in future.
16. A review of overland stormwater flow paths, minor drainage paths and stormwater drainage infrastructure is carried out one year and five years after the project commences operation. All impacts identified are to be addressed and/or mitigated by the Proponent within two years of the date of commencement of the project.



INNER WEST COUNCIL

17. Conditions E63 and E64 are deleted. These conditions impose requirements for a *Road Network Performance Plan* before the project commences operations and an *Operational Road Network Performance Review* within 1 year and 5 years of completion. Instead, funding is to be provided to protect local streets from through-traffic and to improve walking and cycling infrastructure.

18. In relation to the additional construction ancillary facility on The Crescent (facility C6a), staff must be stationed on the footpath when any vehicle is entering/departing the facility.

This path is used by people walking and cycling, and people cycling westbound (downhill) are travelling fast. Drivers, especially truck drivers who are seated higher, tend to look 20-30m into the distance for approaching vehicles and can fail to see people walking or cycling immediately in front of the truck cabin.

19. The 'note' associated with Condition E58 be deleted.

Condition E58 requires the Proponent to provide improved walking and cycling connections between Roberts Street and Springside Street Rozelle with connections incorporated in the project's *Pedestrian and Cycle Implementation Strategy* (required by Condition E60). The 'note' associated with this condition states that work to provide these connections is not specifically required to be undertaken on Victoria Road and could instead include works on the parallel local road network. The approved project includes a new tunnel under Victoria Road linking the ANZAC Bridge and Iron Cove Bridge with claimed benefits including spare road capacity on Victoria Road. This spare road capacity must be captured for other transport options including wider footpaths.

20. The modification must not preclude the possible future delivery of the City West Cycle Link connecting the Greenway at Iron Cove with Anzac Bridge and Glebe Island Bridge. Further, safe legible connections should be provided between the proposed active transport links and the RRY northern path.