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Department of Planning, Industry & Environment
320 Pitt Street / Sydney NSW 2000

Attention: Belinda Scott
By email: Belinda.Scott@planning.nsw.gov.au

Dear Belinda

City of Sydney submission on Sydney Gateway Road Project Environmental Impact Statement – SSI-9737

Thank you for the opportunity to provide comments on the Environmental Impact Statement (EIS) for the Sydney Gateway Road State significant infrastructure project.

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

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

Yours sincerely,



Graham Jahn AM
Director
City Planning | Development | Transport

1. Introduction

1.1. Sydney Gateway Environmental Impact Statement

The City provided comments in July 2019 on the Sydney Gateway Concept Design. In its submission the City focused particularly on the inadequacy of the active transport component of the concept design and the severance of existing active transport connections around the airport.

The City believes that the design in the EIS still fails to adequately address these concerns, and that the design which the EIS is based on will deter people from walking and riding to and from the airport. To ensure consistency with the NSW Government's transport policies, the design must be changed to ensure that people have more transport choices and to ensure there is no further deterioration in conditions for walking and cycling.

Further, Sydney Gateway will make driving to and from the airport significantly more attractive, while nothing has been done to address the barrier to using public transport created by the NSW Government's station access fee at the airport. This misses a major opportunity for the project to better respond to NSW Government policy.

We note that although the Sydney Gateway is not within the City's Local Government Area (LGA), there will be 'downstream impacts' on the City because Sydney Gateway provides a direct connection to WestConnex and St Peters Interchange. Vehicle volumes on the surface street network in the City are likely to increase as a result.

We have included several of the recommendations from the City's submission on the concept design in our submission on the EIS because the Sydney Gateway Project Team has not adequately dealt with them and they remain unaddressed.

2. The nexus between transport provision and mode choice

2.1. Sydney Gateway is working against NSW Government Public Transport Policy

Sydney Gateway (working in concert with WestConnex) will provide additional capacity and improved travel times for people driving to the airport. This will encourage driving to the airport (and provide a solid revenue source for the airport parking privately operated by Sydney Airport Corporation).

Together with building Sydney Gateway, the NSW government continues to impose the Sydney Airport Station Access Fee for people travelling to and from the airport by train. This charge increases the cost of, and acts as a significant barrier to, people using public transport to and from the airport, and reinforces the efficacy of driving to the airport. It also reflects very poorly on Sydney's global status when the high cost of travel to and from the airport is a visitors first and last experience when travelling in Sydney.

The EIS states that "an increase in rail services will not satisfy the project objectives" The City is not persuaded by this view and is concerned that insufficient weighting is given to the benefits associated with an increase in rail services. The City believes more work should be done, including consideration of the benefits of public transport over roads, before the public transport option is rejected in favour of further road expansion.

RECOMMENDATIONS

That the:

- design of Sydney Gateway is amended to ensure that the Sydney Gateway project helps achieve the NSW Government's policy and aims

- promotion of driving over public transport is explicitly addressed and justified in the EIS documents
- Sydney Airport Station Access Fee is removed to eliminate this major penalty for travelling by public transport to the airport
- consideration of strategic alternatives to Sydney Gateway includes comprehensive analysis of potential improvements to public transport, particularly passenger trains, including greater consideration of the benefits of public transport over roads

2.2. Sydney Gateway is working against NSW Government Active Transport Policy

Sydney Gateway (working in concert with WestConnex) will provide additional capacity and improved travel times for people driving to the airport. This will encourage driving to the airport (and provide a solid revenue source for airport parking privately operated by Sydney Airport Corporation).

While the NSW Government has funded and designed a motorway connection for the airport costing around \$2.2 billion, it has failed to provide an adequate walking and cycling connection between the nearby regional cycleway (along Alexandra Canal) and the airport – which is a major employment area and destination in itself.

It is unacceptable that people visiting and working at the airport are not being given a real choice between transport modes. Government policy emphasises the importance of active transport while Sydney Gateway gives preference to vehicular transport, despite the thousands of people who live within biking or walking distance of the airport.

RECOMMENDATIONS

That the:

- design of Sydney Gateway is amended to ensure that the Sydney Gateway project helps achieve the NSW Government's policy and aims
- promotion of driving over cycling access, and failure to provide cycling facilities as part of this major road upgrade, is explicitly addressed and justified in the response to submissions on the EIS

2.3. NSW Government's policy frameworks

The NSW Government's vision in *Future Transport 2056*, reflects community feedback that "more cycling and walking infrastructure needs to be delivered sooner". In addition *Future Transport 2056* states that "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". A cycleway between Alexandra Canal and the domestic terminal is part of the NSW Government's Principle Bicycle Network, the Greater Sydney Commission's Green Grid, and the South East Transport Strategy. This road project should not be approved if it fails to deliver on these plans.

Needing to rely on vehicular transport as Sydney Gateway does, with few active transport options available, generates more traffic with all the associated issues of air pollution, congestion and unreliable travel times that this creates. In addition less attention is being given to active transport in terms of future networks.

Over 5000 people work within 10kms of the airport. This lack of connection between the local community and a major centre is completely inconsistent with the NSW Governments' own *Future Transport 2056* objectives.

RECOMMENDATIONS

That the:

- Sydney Gateway project address the key NSW Government transport and land use policies and strategies in relation to active transport
- proponent make public transport an attractive travel choice for workers and travellers using Sydney Airport
- proponent deliver an active transport network that provides safe, legible and attractive connections to the airport to provide more sustainable travel choices and to help discourage private vehicle trips to the airport
- NSW Government make a commitment to reallocate street space to active transport in the Mascot area when the Sydney Gateway is completed (including widening footpaths and providing additional separated cycleways) so that the NSW Government can deliver on its active transport and place based policies and strategies

3. Specific Issues to be considered in the EIS

3.1. Cycleway along Alexandra Canal

The City recognises there has been good progress in maintaining direct regional cycleway access along the Alexandra Canal as part of this project, although it would add 160 metres compared with the existing active transport link.

The City notes, however, that the design includes a proposal to sever this direct regional cycleway access for a full three years during construction. This requires people walking and cycling to make a diversion that adds some 670 metres to their trip compared to the existing (not 580 metres as cited in the EIS). The EIS fails to indicate the additional time cost for walk and cycle trips. This diversion, in addition to the extra effort, would add eight minutes to the walking trip and two and a half minutes to the cycling trip. This is the equivalent of requiring drivers on an equivalent arterial road to make a 9.5 km or 3.2 km diversion (respectively) for three years, a very unlikely scenario.

The City is not convinced that either Sydney Airport or RMS, as joint proponents of the Sydney Gateway project, have exhaustively explored alternatives which would reduce the length of time that the regional cycleway would be diverted. We also note that the very long diversion for people walking and riding over three years is not highlighted, or even noted, in the summary of key potential impacts during construction at page xv of Volume 1 of the EIS.

RECOMMENDATION

That the:

- adverse impact on the regional cycling route near the airport over three years of construction, and the inability to find a solution that reduces this impact by at least 80%, is explicitly addressed and justified in the response to submissions on the EIS

3.2. Facilities for active transport customers

The City believes the following key connections – consistent with the NSW Government's strategic vision *Future Transport 2056* – should be provided:

- a cycling connection between the St Peters interchange and the Alexandra Canal cycleway

- a direct, rideable crossing of the Cooks River connecting the South and Sydney City Centre
- direct connections between the Alexandra Canal Cycleway and the T2 and T3 airport terminals as well as beyond the Bayside Council cycleway network
- a direct cycleway connection between Coward St and Sydenham station
- safe cycling and walking connections during the construction and operation of the Sydney Gateway.

RECOMMENDATIONS

That the:

- Sydney Gateway project provide adequate active transport facilities at all times during both the construction and operation stages of the project
- project provide key active transport connections to the airport terminals and public transport services, as well as existing walking and cycling networks

3.3. Heritage Impacts

The City of Sydney acknowledge that the footprint of proposed works do not appear to be in close proximity of the heritage items within our LGA, namely Alexandra Canal (SHR) and I1405 Rudders Bond Store (LEP2012).

However, there will be major impacts on Alexandra Canal including its sandstone embankment within Inner West and Bayside Council areas. Any adverse impact within other LGAs will affect the significance of the SHR listed item.

In section 10.0, the statement of heritage impact makes recommendations for various measures to mitigate those heritage impacts. It is recommended to include them as conditions of consent.

RECOMMENDATION

That:

- Any approval of the Sydney Gateway project should incorporate the various measures outlined under section 10.0 of the statement of heritage impact as conditions of consent to mitigate impacts to the heritage significance of the Alexandra Canal.