

Alexandria to Moore Park, Stage 1 Project

Submission from the Committee for Sydney

December 2019

The Committee for Sydney, herein after referred to as simply 'The Committee', welcomes the opportunity to present a submission on the *Review of Environmental Factors* (REF) for the Alexandria to Moore Park (A2MP) Stage 1 project.

This submission represents the views of the Committee for Sydney specifically and should not be automatically assumed to be representative of the views of all of our membership organisations.

About the Committee for Sydney

The Committee for Sydney is an independent think tank and champion for the whole of Sydney, providing thought leadership beyond the electoral cycle. Our aim is the enhancement of the economic, social, cultural and environmental conditions that make Sydney a competitive and liveable global city.

The Committee for Sydney view

The Committee for Sydney believes that the Alexandria to Moore Park (A2MP) Stage 1 project should be withdrawn entirely on the following premises:

- That the proposal is out of sync with other strategic governments
- That the proposal is out of sync with the broader vision for nearby precincts
- That the proposal will result in less walkable and lower quality places
- That the proposal will induce traffic and not solve for congestion

The Committee for Sydney is not ideologically opposed to any changes along this corridor. We acknowledge the scale of development in surrounding areas.

However, we reject that the appropriate response to that challenge is to introduce road-engineering solutions which ignore decades of evidence on induced demand, while simultaneously refusing to consider investment in alternative modes of transport, such as active transport or public transport.

We also strongly dispute that the A2MP project will not have a large and negative impact on the quality of place in the project area and suggest that the proposal as it stands has failed to adequately balance the needs of movement and place. Even on a movement basis, the proposal as it stands appears to only overwhelmingly focus on the east-west movement of private automobiles, while neglecting the interests of pedestrians and cyclists.

A substantial oversight

The Committee for Sydney is surprised that nowhere in the 434-page REF of ASMP Stage 2 is the concept of induced demand even mentioned once. This is part of a broader challenge arising from the fact that RMS's own [Traffic Modelling Guidelines](#) view induced demand as a topic of "much debate" rather than a commonly observed and quantifiably provable phenomena, as was recently [confirmed by WSP](#) in a meta-review of the latest evidence on induced demand which drew on evidence from 25 papers from across Europe and the OECD. Of particular note for this submission is WSP's conclusion that "Induced demand is likely to be higher for capacity improvements in urban areas or on highly congested routes.

Though RMS has been absorbed into Transport for NSW, the Committee remains concerned that projects such as ASMP Stage 2 may be over-reliant guidelines which appear treat modelling of induced demand as an optional (non-mandatory) extra when undertaking road modelling. While such considerations are beyond the scope of this review, the Committee would strongly recommend that TfNSW review its Traffic Modelling Guidelines to ensure that they are accurately reflecting global best-practice methodologies for estimating the impact of induced demand. Of worth recommendation is a 2019 report by Todd Litman at the Victoria Transport Policy Institute on [Generated Traffic and Inducted Travel: Implications for Transport Planning](#).

The Committee would also like to recommend that induced demand modelling be undertaken on all road projects, and not just major projects. If such modelling has not taken place for the A2MP Stage 1 project, then the REF's assumptions about large efficiency gains on major roads need to be called into question, particularly given the hugely damaging impact that this proposal will have on the Alexandria to Moore Park corridor from a place making perspective, both in the short term and in the sense that it will inhibit any possibility of the street evolving into a vibrant street as nearby development continues to catalyse urban renewal surrounding the corridor.

Inconsistency with other government documents

A2MP Stage 1 is inconsistent with the following government documents

- **Strategic and guiding documents from the Greater Sydney Commission (GSC).**
 - Strategy 16.2 of the [Greater Sydney Region Plan](#) and section 32.C of the [Central District Plan](#) both advocate for *“Balancing the need to minimise negative impacts of freight movements on urban amenity with the need to support efficient freight movements and deliveries”*.
 - The Committee feels that A2MP Stage 1 adopts an inappropriate balancing which undermines urban amenity while depending on questionable assumptions about more efficient freight movement which appear to inadequately take into account the impact of induced demand eroding any such benefit over the longer-term.
 - The Committee also questions the use of freight movements as a justification for the A2MP Stage 1 project, given that the GSC Eastern District Plan has also flagged that Transport for NSW will be developing a Last Mile Freight Policy, which will push freight movements to occur outside of peak times, when roads are less congested.
 - The Committee also notes that the GSC has identified the Green Square-Mascot area as one of its 34 strategic centres. The GSC has identified that *“enhancing walkability in and around metropolitan, strategic and local centres is a priority”*.
 - The GSC has identified that *“direct, safe and accessible routes to local destinations and services should be prioritised within a 10-minute walk of centres”* (Obj. 12) noting that *“this may require improvements to the street environment to encourage walking and cycling. This can be best achieved through place-based planning for centres in accordance with the Principles for Greater Sydney’s Centres”* (Obj. 22).
 - The Committee views the ASMP Stage 1 project as a missed opportunity to invest in sidewalk enhancements that would have enhanced walkability along the corridor.
 - The Committee notes that Objective 12 of the the GSC Greater Sydney Region Plan acknowledges that *“leading a healthy and active life means substituting walking and cycling for short car journeys. More people can be encouraged to walk and cycle where there is a safe road environment and suitable pathways”*.
 - For strategic centres such as the Greensquare-Waterloo Precinct, the GSC calls for:
 - Long streets that allocate sufficient road space to safe walking and cycling; with a permeable and well-connected urban form that has human scale and attractive streetscapes.
 - Suitable pathways with pedestrian crossings of universal design and appropriate lighting, shading, way finding, kerb ramps, rest points and natural surveillance to provide comfortable and safe conditions for pedestrians with mobility constraints.
 - The Committee feels that none of these objectives have been adequately sought after through the A2MP Stage 1 proposal.

- The Committee notes that the A2MP REP states that *“enhancing access to a broader range of jobs and services within 30 minutes is also key consideration of the [GSC] plan. The proposal would support the plan as it would improve road networks and transport corridors supporting future growth”*
 - The Committee cautions that this is a fundamental misreading of the Greater Sydney Commission’s 30-minute vision, which specifically explains that *“a 30-minute city is where most people can travel to their nearest metropolitan centre or cluster **by public transport** within 30 minutes; and where everyone can travel to their nearest strategic centre **by public transport** seven days a week to access jobs, shops and services”*.
 - The GSC’s vision has never been to facilitate a 30-minute city by car. It has been to facilitate a 30-minute city by train, with a focus on walkability within a 10-minute radius of strategic centres.
 - Given the absence of investment in either public or active transport, it is incorrect for the REF to argue that this proposal is in keeping with GSC’s vision for a 30-minute city.
- **Transport for NSW Future Transport 2056**
 - The Committee for Sydney notes that the NSW Future Transport Strategy:
 - Does not envision the Greensquare-Waterloo Precinct as connected to the Greater Sydney Strategic Freight Network OR the Strategic Road Network by 2056.
 - Does envisage the Greensquare-Waterloo Precinct as connected to both the Principal Bicycle Network AND the City Serving (Bus, ferry, light-rail, train, walking and cycling) Network by 2056
 - The Committee notes that much of the urban form and density of the Greensquare-Waterloo Precinct that will be delivered in coming years will remain the same many decades from now, and as such, we believe it would be more appropriate to target local infrastructure investments to be in sync with the Future Transport 2056 vision for the precinct, which is one of active and public transport.
 - The Committee notes that like the GSC Greater Sydney Master Plan, the TfNSW Future Transport Strategy also views that 30-minute city objective as being underpinned by public transport.
 - The Future Transport Strategy specifically acknowledged that:
 - *“Public transport is the focus of the 30-minute city as it is the only way large numbers of people can access major centres efficiently and reliably, particularly as the number of trips on the network increases. To achieve the delivery of a 30-minute city, public transport will need to take a greater role in moving people around Sydney. We will achieve this through investment in mass transit, improving service frequencies, prioritising public transport around centres and improving walking and road base connections to public transport and centres”*

- Customer Outcome 7 of the Future Transport strategy acknowledged that
 - *“On key or principal corridors, particularly around our centres, more efficient vehicles such as buses will be prioritised so they can perform more efficiently”*
- Customer Outcome 9 also vowed to:
 - *“Encourage modal shift away from private vehicle usage and toward public transport modes”*
 - *“Partner with local government to expand 40km/h in high pedestrian activity and local areas to reduce crashes and protect pedestrians”*
 - *“Maximise safety integration in bicycle network programs to facilitate safer movement, provide separation from other traffic, where appropriate, and manage vehicle speeds”.*
- The A2MP Stage 1 proposal is inconsistent with both of the above Outcomes, particularly in light of RMS’s decision to reject the City of Sydney’s calls for a 40km/h speed limit along the corridor, and the refusal to consider investment in separate bike lanes along the route.
- **The Infrastructure NSW State Infrastructure Strategy 2018**
 - The Committee notes that the [NSW State Infrastructure Strategy 2018](#) recommends:
 - *“Better public transport connections [to] enhance the vibrant, innovative and highly-productive areas located at the periphery of Sydney’s established CBD...[including in] major growth precincts in Green Square, Central to Eveleigh and the Bays Precinct.”*
 - *Re-allocate road space in key commuter corridors to give priority to the most productive and sustainable transport modes”*
 - The Committee views investments which entrench automobiles as the dominant mode of transport as failing to give priority to the most productive and sustainable transport modes, which would include public transport and active transport.
- **The NSW Government’s Movement and Place Framework**
 - The Committee acknowledges that the NSW Government has yet to release its practitioners guide and tools for the new Movement and Place framework, but in the interim, we can determine from the document on [Aligning Movement and Place](#) that the A2MP Stage 1 Project is out of step with the Movement and Place framework as envisioned through the Future Transport Strategy.
 - Underpinning the Movement and Place framework is the belief that *“movement be made as efficient as possible, including by assessing the walkability and cyclability of short trips, and the role of public transport for longer journeys”.*

- To drive that, 6 objectives were developed to guide the allocation of road space and its integration with surrounding land-uses. Of most relevant to this submission are:
 - *Better Performance - “Facilitating and encouraging sustainable transport modes including walking, cycling and public transport and minimising the space dedicated to vehicle movement. Integrating green infrastructure, including tree canopy, open space, bushland and waterways with urban development and grey infrastructure, such as streets, roads and public transport”*
 - *Better Fit - “Places within easy reach by foot or cycle that provide for daily needs can ‘compete’ with short trips by car, particularly if walking and cycling is supported, and short trips discouraged”*
 - *Better working - “Transport choice allows users to dynamically adjust to incidents as well as creating long term ‘virtuous circles’, where more people using active and public transport benefit not only themselves and others like them, but also can reduce the number of cars (and congestion) on the road”*
- The Movement and Place Document specifically identifies that “strategies should be in place for achieving mode shift”, regardless of which categorisation a specific road falls into.
- The Committee is also concerned that the corridor considered by this submission may have been miscategorized within the Movement and Place framework as a ‘movement corridor’, when in reality, the urban renewal of the surrounding area indicates that the corridor’s future identity sits in the ‘Vibrant Streets’ category.
- The Committee is concerned that delivery of the A2MP Stage 1 project would undermine the capacity of the corridor to develop into a vibrant, walkable, mixed-use high-street.
- **The NSW Government Architect’s vision for the Sydney Green Grid**
 - The Committee notes that delivery of open space and the delivery of greener public spaces is currently one the [NSW Government’s Premier’s Priorities](#). The NSW Government Architect’s work on the Sydney Green Grid is an integral part of delivering on that project.
 - However, in the list of “[Green Grid Project Opportunities](#)”, item number 5 on the list is lists green infrastructure connections between Green Square and Moore Park as a priority, while priority project number 10 specifically calls for “Active Transport Green Links” that would cross McEvoy Street at both George Street and Bourke Street. By inducing traffic onto McEvoy Street, this will make crossing at these intersections more difficult.
 - More broadly, the Committee views the REF’s proposal to remove 49 trees from within the A2MP construction footprint as in contradiction with the both the Premier’s priorities and the Green Grid. 25 of these trees are mature trees that will only be replaced with immature trees, leading to a significant deterioration in both canopy cover and urban amenity.

- **The Moore Park Masterplan 2040**

- The Moore Park Masterplan has flagged that Dacey Avenue will be reconfigured to allow for greater pedestrian and cycle access. The Masterplan identified that:
 - Current tree-lined boulevards will also be strengthened and extended into the surrounding conduct, including down Lachlan Street.
 - Cycleways will be improved, with Lachlan Street specifically benefitting from an upgraded network of pathways for cyclists and pedestrians. Gadigal Avenue would also benefit from these upgrades.



*Moore Park Masterplan 2040

- The A2MP Stage 1 proposals directly contradict these planned improvements on both Lachlan Street and Gadigal Avenue.

- **The NSW Government's Towards Zero Road Safety Plan**

- The Committee acknowledges that a core justification underpinning the A2MP Stage 1 Project is the need to reduce fatalities and road accidents.
- Another core justification underpinning the project is the need to increase traffic speeds and movements along the corridor.
- The latter justification is at odds with the NSW Government's [Towards Zero Road Safety Plan](#), which acknowledges that lower "safe speeds", particularly in high pedestrian and bicycle areas, will be critical to achieving a zero fatalities outcome.
- The Towards Road Safety Plan notes that:
 - *"An evaluation of 40km/h high pedestrian activity areas in NSW found there was a 33 per cent reduction in crashes causing serious injuries and deaths between 2005 and 2015. These zones include busy shopping precincts and neighbourhoods"*

- *“Simple signal changes, that give more time or priority to cross, protect people crossing”*
 - *“[There is] strong support for slowing traffic in high pedestrian and bicycle rider areas, while providing separation through infrastructure treatments”*
- It has also pledged the NSW Government to:
 - *“Install traffic calming, pedestrian refuges and crossings in busy urban places across NSW, to improve pedestrian and bicycle rider safety, and reduce casualty crashes”*
 - *“Maximise safety integration in bicycle network programs to facilitate safer movement, provide separation from other traffic, where appropriate, and manage vehicle speeds”*
- The Committee notes that the A2MP Stage 1 project seeks to neither install new pedestrian refuges, nor separated bicycle pathways, nor introduce more pedestrian friendly signaling.
- The project instead aims to do the reverse of traffic calming, and that is to attempt to generate speeds up to 33% faster in the AM peak, and 15% faster in the PM peak, in contradiction of the broader goals of the Towards Zero Road Safety Plan.

Without consistency, the project is not worth keeping

- The Committee has identified that the A2MP Stage 1 project is inconsistent with the following documents:
 - *The GSC Greater Sydney Master Plan*
 - *The GSC Central District Master Plan*
 - *The TfNSW Future Transport 2056 Strategy*
 - *The Infrastructure NSW Infrastructure Strategy 2018*
 - *The NSW Government’s Movement and Place Framework*
 - *The NSW Government Architect’s Green Grid*
 - *The NSW Government’s Premiers Priorities*
 - *The Moore Park Masterplan 2040*
 - *The NSW Government’s Towards Zero Road Safety Plan*
- The Committee also views the proposal as completely mis-aligned with the vision for a walkable, multi-modal, Greensquare-Waterloo Precinct.
- **The Committee recommends that the proposal be rejected.**