

General Manager  
Woollahra Council  
PO Box 61  
DOUBLE BAY  
NSW 1360

22<sup>nd</sup> July 2021

Dear Woollahra Council,

**RE: Draft Edgecliff Commercial Centre Planning and Urban Design Strategy**

Thank you for the opportunity to comment on the draft strategy for Edgecliff Commercial Centre Planning and Urban Design. Bicycle NSW has been the peak bicycle advocacy group now in NSW for over forty-five years, and has over 30 affiliated local Bicycle User Groups.

Our mission is to make cycling better for everyone in NSW, and we support improvements to the pedestrian environment and advocate for new cycling routes that incorporate dedicated paths within the road environment, providing connections to jobs, schools and services for daily transport and recreation trips.

The Draft Planning and Urban Design Strategy, read in conjunction with the Draft Public Domain Plan<sup>i</sup>, recognises the poor urban environment in the vicinity of the Edgecliff Commercial Centre and train station.

- New South Head Road is a congested arterial connection with high traffic speeds.
- the northern side of the road has a very narrow footpath and little urban greening.
- the sloping topography constrains walkability for less mobile pedestrians.
- there are few activation nodes to attract people to spend time and linger in the public domain.
- the street furniture is minimal
- there are insufficient connections between the two sides of the road for people walking and cycling.
- the public domain is neglected and unloved.

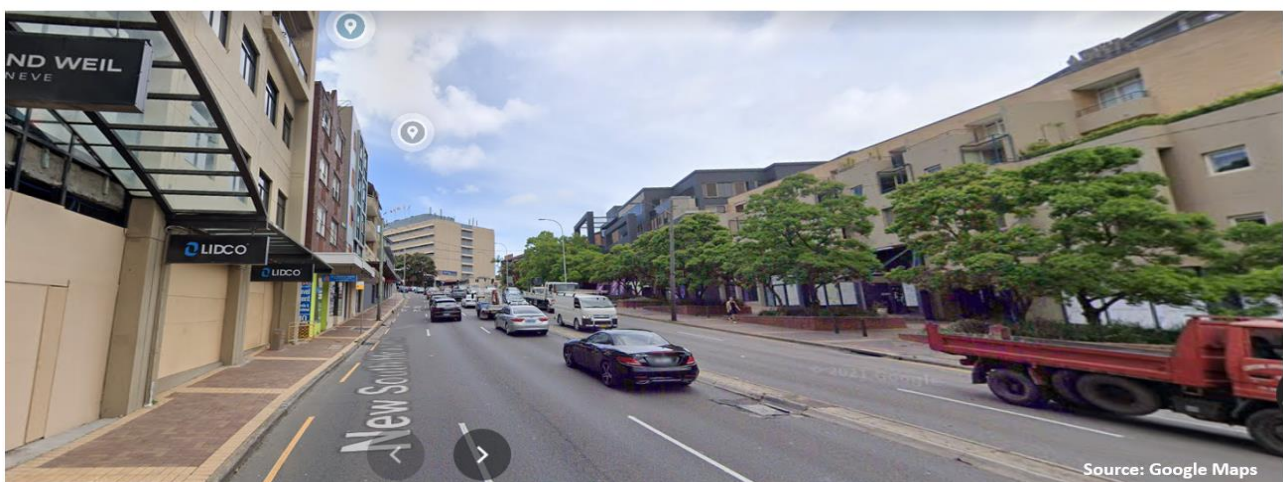


Figure 1:  
New South Head Road, looking south-east towards the Edgecliff Centre, has poor pedestrian amenity

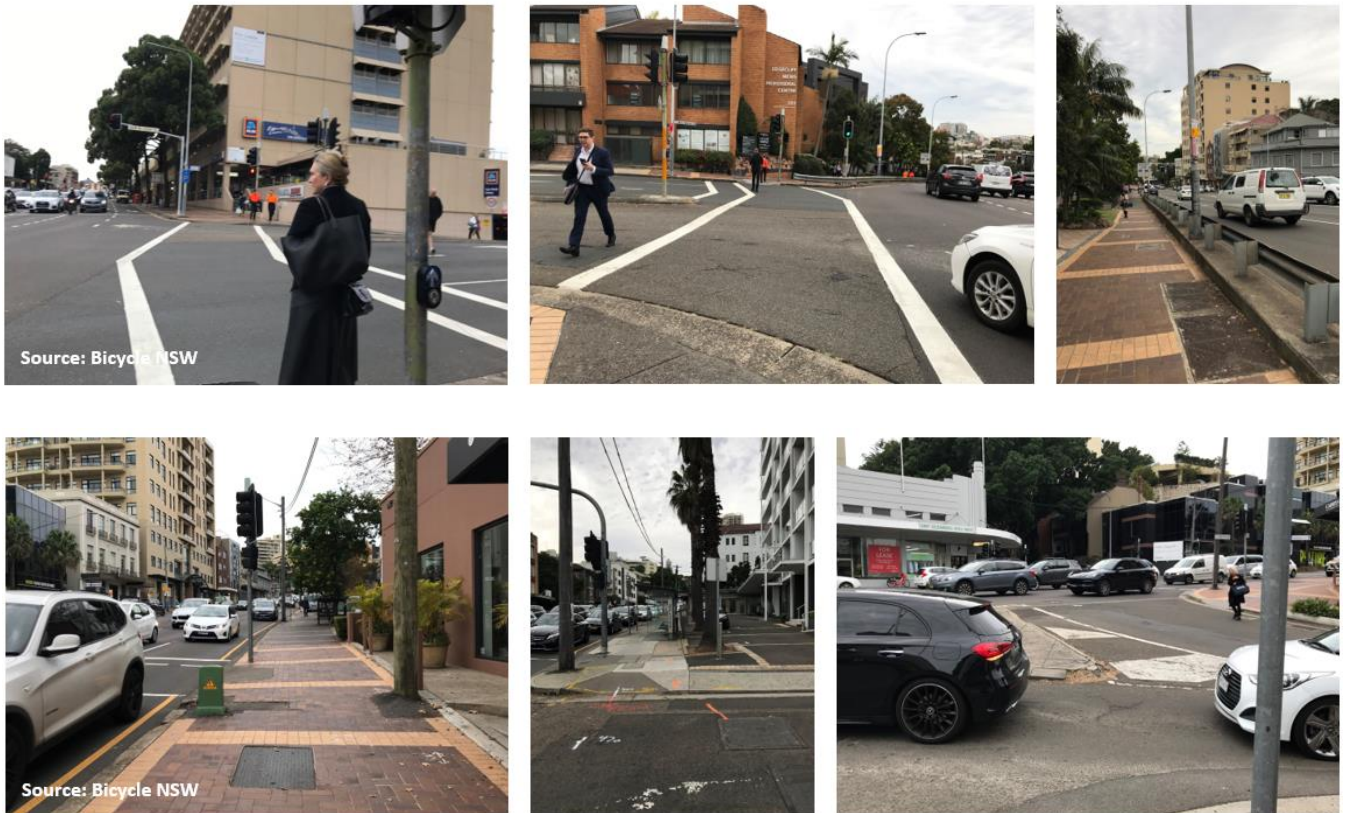


Figure 2:  
Examples of the dangerous pedestrian crossings and poor public domain along New South Head Road (Source: Bicycle NSW)

We have reviewed the draft strategy alongside other relevant plans that relate to the Edgecliff area to identify the possible opportunities for improving the active transport network. These plans include:

Transport for NSW Future Transport 2056 Plan, which commits to provide a regional cycle network in Greater Sydney

Greater Sydney Region Plan, A Metropolis of Three Cities (2018) which locates Edgecliff in the Eastern Harbour City

Eastern City District Plan (2018) aims to improve the 30-minute access to jobs within the Eastern City by enhancing east/west connectivity via a potential rapid bus service between Sydney City and Bondi Junction and a number of walking and cycling infrastructure commitments. Edgecliff is identified as a local centre.

Sydney Green Grid<sup>ii</sup>, developed by the NSW Government Architect in 2017 and reflected in the district and region plans, proposes an interconnecting network of open spaces that support walking and cycling.

Woollahra Local Strategic Planning Statement 2020, a 20-year vision and planning document. Council outlined as its **first planning priority** the delivery of a transport network that supports a healthy, sustainable and connected community and committed to support walking or cycling as the most convenient option for short, everyday trips up to 2km.

Woollahra Draft Integrated Transport Strategy 2021<sup>iii</sup> contains targets to increase the uptake of active transport (walking and cycling) to 14 per cent by 2026 (8.2) and decrease the use of people driving cars to 40 per cent by 2026 (9.2) and a commitment to increase the number of people walking and cycling by investing in and building safe, accessible and attractive pedestrian paths, crossings, cycle ways, bicycle

parking and supporting infrastructure (8.3) The ambition is to make walking and cycling the most convenient option for most trips.

Woollahra – 2030 Our community, our place, our plan<sup>iv</sup>, the community strategic plan, which details Council's targets and commitments in relation to 11 goals grouped into five key priority themes (community wellbeing, quality places and spaces, a healthy environment, local prosperity, community leadership and participation). The transport targets include a commitment to create a 30km integrated network of bike paths by 2025 while reducing traffic noise and speeding (Goal 6), greenhouse gas emissions and ecological footprint (Goal 8).

Woollahra Bicycle Strategy 2009<sup>v</sup>, aims to complete major routes that provide regional connectivity augmented by the *Every Street a Cycling Street* concept that facilitates bike use on all local roads.

## High level ambitions:

The Woollahra Bicycle Strategy 2009<sup>vi</sup>, identifies the **New South Head Road corridor as Route A2** in the cycling network, with fully separated cycling facilities as a key long-term objective.

The Green Grid identifies two important links. The Bondi to Double Bay Green Link (44) is located to the east of the Edgecliff Commercial Centre (ECC) and connects Coopers Park with Double Bay Wharf via Manning Road. The **Paddington Greenway** runs across the western edge of the ECC and will link Centennial Park to Rushcutters Bay Park, via Trumper Park and Rushcutters Bay Creek.

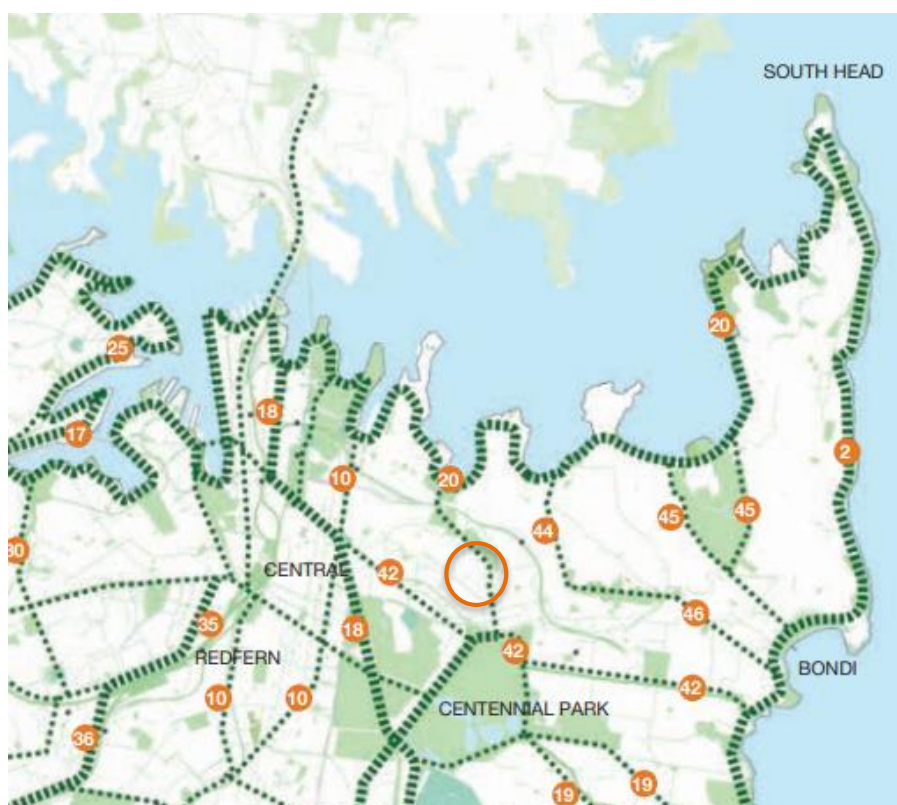


Figure 3:  
Extract from the Green Grid showing  
project opportunities in the Eastern  
Suburbs  
(Source: Tyrrell Studio / NSW Government  
Architect)

 Paddington Greenway

The Paddington Greenway is recognised as a key signature project in the Woollahra Integrated Transport Strategy (Section 5.1). It is envisaged as a recreational route that also connect with major active transport routes to the Sydney CBD, at the northern and southern ends of the route.



Bizarrely, the 2020 Woollahra Local Strategic Planning Statement (LSPS) has a structure plan (figure 4) that doesn't include any of these important elements of the active transport network.



Figure 4:  
Extract from the structure plan in the Woollahra  
LSPS, published in 2020.  
(Source: Woollahra Council)

## Concerns:

One of the three guiding policy themes at Bicycle NSW is 'Build it for Everyone'<sup>vii</sup> and we advocate for safe connected infrastructure that is suitable for riders from 8 to 80 years of age to use independently.

The Draft ECC Planning and Urban Design Strategy ignores the opportunity to incorporate high quality separated cycle paths that will allow residents of all ages and abilities to use bikes for everyday trips, journeys to school and commutes to work.

There is no alignment with the Woollahra Draft Integrated Transport Strategy (ITS). For example, the Paddington Greenway is not mentioned, and there is no discussion of ITS's intent to prioritise active modes. (Section 9.4.1)

The Draft ECC Planning and Urban Design Strategy does not reflect or commit to the integration of the Principle Bike Network (PBN) along this key east-west route linking the Eastern Suburbs with the CBD. The masterplan (figure 5) shows no cycle infrastructure. Section 5.11 Transport does not mention cycling at all.

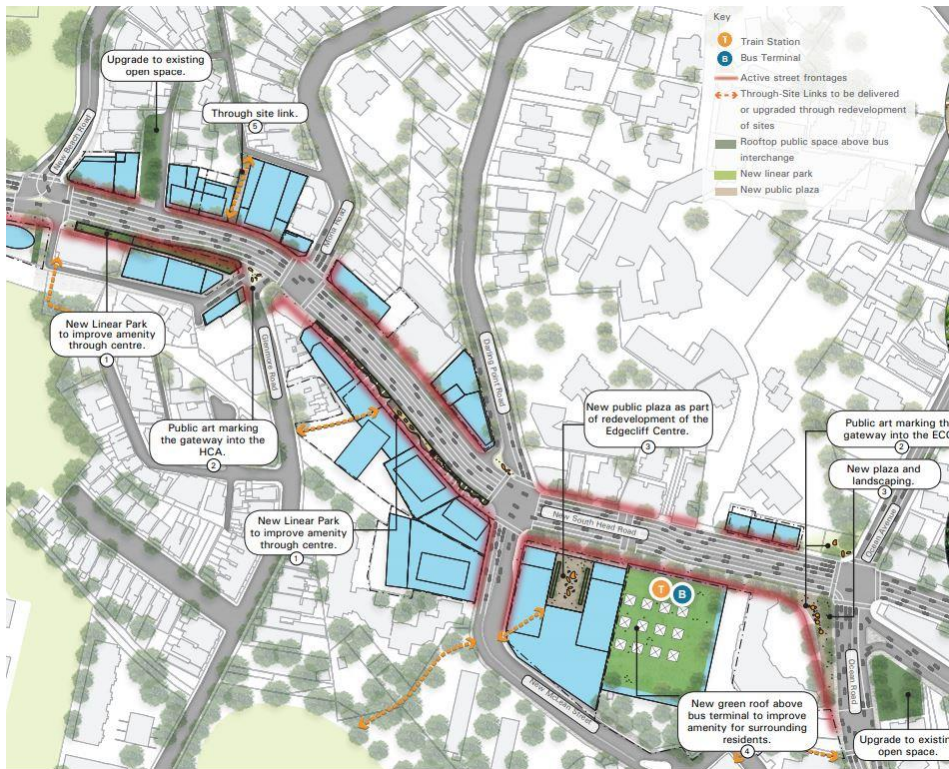


Figure 5:  
Masterplan from the Draft Edgecliff  
Commercial Centre Planning and  
Urban Design Strategy (Source:  
Woollahra Council/SJB Planning)

The Draft ECC Public Domain Plan states that it aims to improve the active transport network in the ECC. However, the structure plan (figure 6) shows a dotted line where the Council will ‘investigate opportunities for a cycle path’. This will be a shared path using existing footpath space.

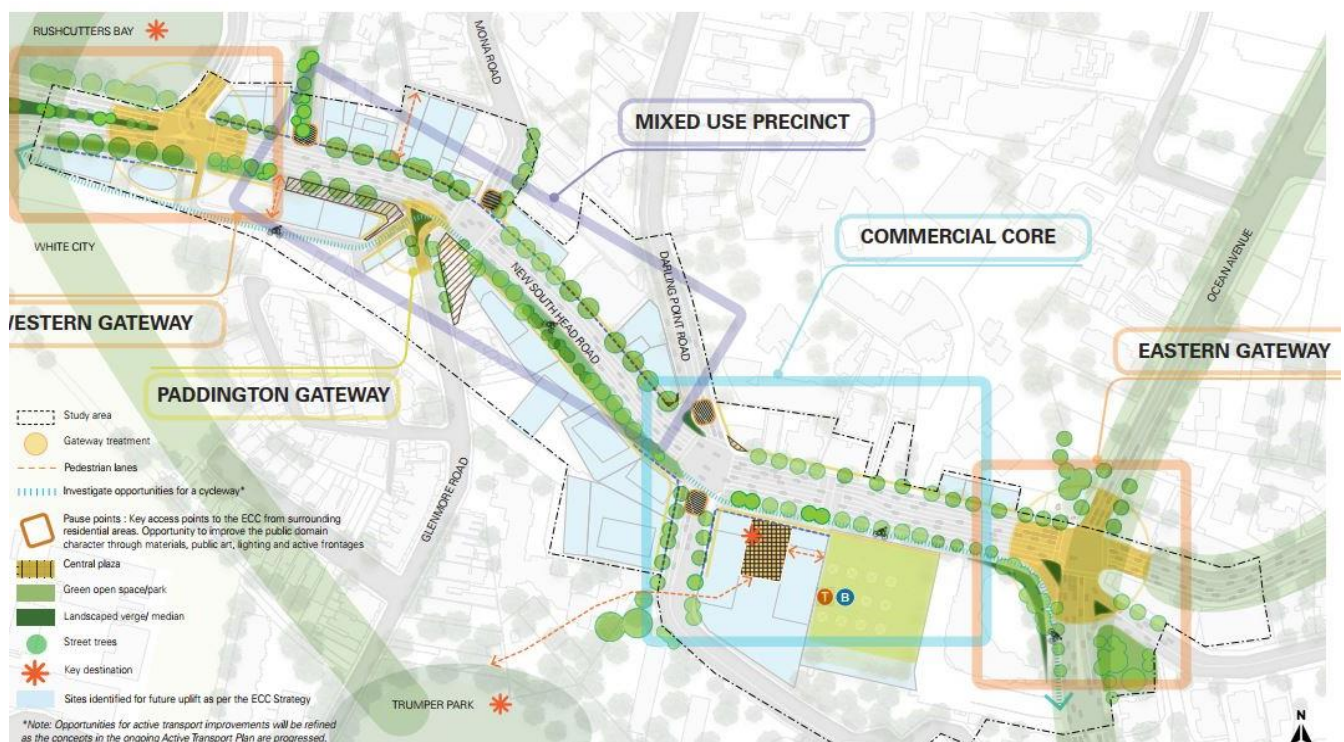


Figure 6:  
Structure Plan from the Draft Edgecliff Commercial Centre Public Domain Plan (Source: Woollahra Council)



Shared paths are not suitable infrastructure for areas with high pedestrian and cycling activity and will not lead to an acceptable level of amenity and safety for either walkers or riders.

The status quo of walking and cycling activity in the area is likely to change rapidly. The density of walkers will increase when new housing and retail is delivered as proposed. An upswing in travel by bikes has occurred recently due to Covid, individual reactions to climate change, a surge in local delivery services and the growing popularity of e-bikes. In addition, State policies to address climate change and urban liveability will add to pressures on councils to secure a much bigger travel share for walking and cycling.

The need to separate people walking and cycling on major commuter routes cannot simply be ignored and the provision of properly separated infrastructure with space to accommodate future demand must be a key policy position of Woollahra Council.

The Draft ECC Planning and Urban Design Strategy indicates a passive acceptance of the existing traffic volumes and speeds on New South Head Road. There is no attempt to reduce the dominance of 6-8 lanes of fast traffic with associated narrow footpaths. Although new landscaping will provide visual amenity and future tree canopy, contain and clarify parking bays and assist with stormwater management, cosmetic upgrades won't improve the real or apparent safety of people walking and cycling.

There is inadequate consideration of how cyclists can access Edgecliff Station and no discussion of the importance of linking the numerous schools in the vicinity of the New South Head Road corridor with active transport.

## Opportunities:

In 2016, Woollahra recorded a population of 58,533. This figure is estimated to increase by 38 per cent to 80,626 by 2056. Edgecliff and Double Bay are expected to experience the largest population growth<sup>viii</sup>.

Private car use currently accounts for 50% of daily trips. Only 12% of daily trips are made via walking and cycling. Cycling trips have scope for significant growth as the two major destinations for work trips (Eastern Suburbs and Sydney CBD) are within cycling distance for many people. Improving active and public transport infrastructure and increasing the take up of people walking, cycling and catching public transport, will ultimately reduce the number of people choosing to drive<sup>ix</sup>.

Census data (2016) shows that the mode share of cycling amongst Woollahra residents cycling to work is very low at only 1%. Woollahra is out of step with neighbouring council areas, including City of Sydney, Inner West, Waverley and Randwick, which have invested more strongly than Woollahra Council in cycling infrastructure and network improvements over the last decade.

There has never been a better time to build for bike riding and active transport, as evidenced in the new Transport for NSW policies that require State projects to prioritize road space for active transport:

- Providing for Walking and Cycling in Transport Projects Policy CP21001<sup>x</sup>
- Road User Space Allocation Policy CP21000<sup>xi</sup>

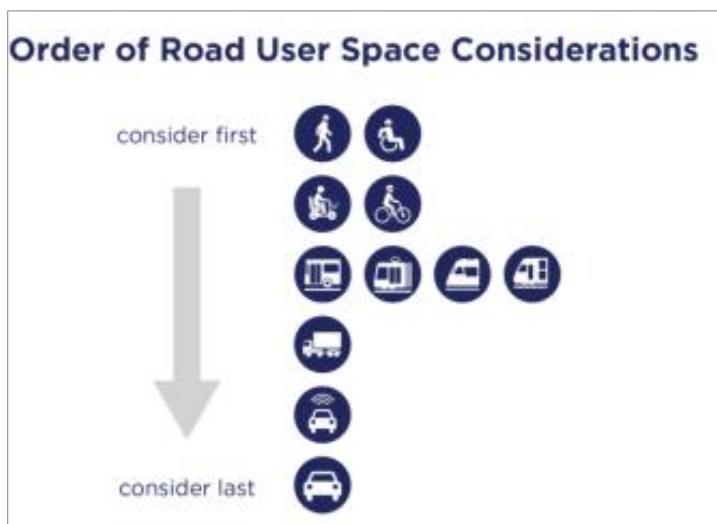


Figure 7:  
Diagram expressing Transport for NSW's  
road user priority.  
(Source: Transport for NSW)

NSW Government has committed to provide a regional cycle network in Greater Sydney, as outlined in the Future Transport 2056 Plan<sup>xii</sup>. The Principle Bike Network (PBN) will be published at some point in the future but will include New South Head Road as a key east-west route linking the Eastern Suburbs with the CBD (Route A2). This is also highlighted by the City of Sydney as a priority route in the Regional Bike Network<sup>xiii</sup>.

Woollahra Council has a once in a generation opportunity to work with Transport for NSW to reallocate road space in favour of dedicated lanes for public transport, walking and cycling. The Woollahra Draft Integrated Transport Strategy explains the additional traffic that could be accommodated on New South Head Road if lanes are reallocated from private vehicle traffic (figure 8).

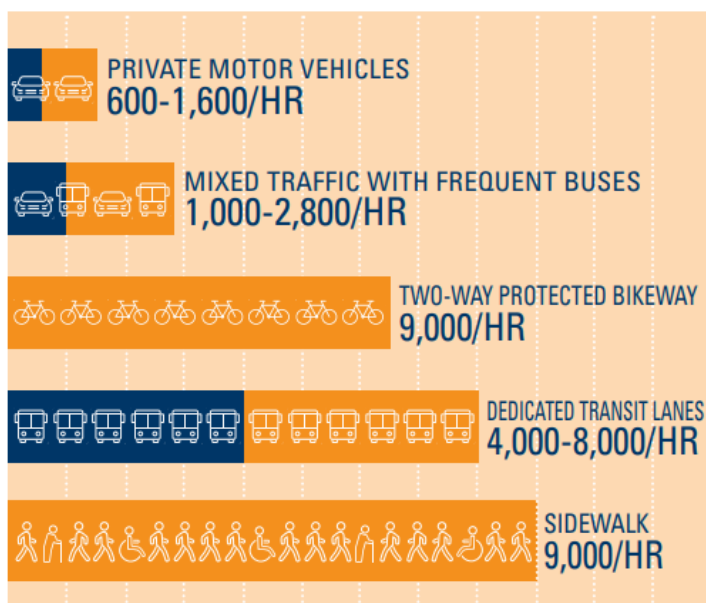


Figure 8:  
The relative space efficiency of modes from the Draft Integrated  
Transport Strategy  
(Source: Woollahra Council / NACTO)

The area has some steep inclines but the increasing use of e-bikes and other micromobility devices will ensure that active transport options are accessible to residents of all ages and abilities.

Our preferred infrastructure is always completely separated paths that cater for all riders of all ages and abilities. According to the best practice 'cycling segmentation' model, developed in Portland USA to identify the type and needs of existing and potential bike riders<sup>xiv</sup>, such cycle paths will allow 70% of local residents to consider journeys by bike (figure 9).

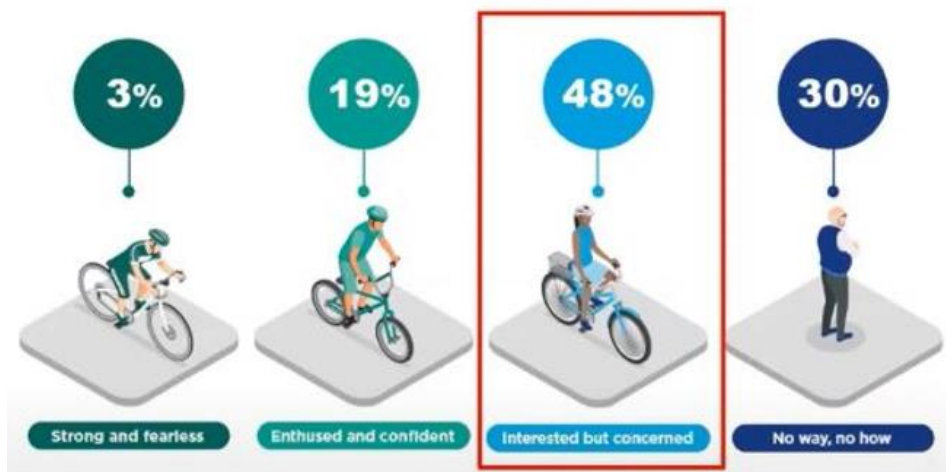


Figure 9:  
Four general categories of comfort  
levels for cycling as transportation.  
Source: North Sydney Council

## Recommendations:

Woollahra Council has a once-in-a-lifetime opportunity to re-imagine Edgecliff as a thriving, liveable, mixed-used sustainable residential quarter on the edge of Sydney's CBD.

It is very disappointing that the Draft Edgecliff Commercial Centre Planning and Urban Design Strategy does not incorporate game-changing upgrades to the active transport network. A shared path is not desirable and can only be considered as a short-term solution while pursuing the long-term goal of a completely separated cycle path.

Woollahra Council needs to show courage and ensure the final ECC Planning and Urban Design Strategy reflects long-term policies of Woollahra Council and the State Government to increase the uptake of active and public transport. Now is the time to develop an inspirational vision for allocating road space and integrating transport modes based on desired future outcomes. By defining the vision, negotiations with residents, businesses and the State Government can proceed with a clear goal in mind. City of Sydney have demonstrated the possibilities with a steadfast commitment over two decades to improving the public realm, reducing the impact of traffic and providing equitable access to public and active transport.

### Key recommendations:

1. Provide a separated cycle path along New South Head Road in place of an existing road lane. This is a priority route for the Principle Bike Network and needs to be incorporated into all plans for the corridor.
2. Provide high-quality, safe conditions for walking and cycling to Edgecliff Station to encourage residents to use public transport. The seamless integration of the cycle route with the station is essential to ensure easy access by bike. If safe cycling is facilitated, the catchment for the train station increases, solving the first/last mile barrier which can inhibit take-up of public transport.
3. Carefully consider connections with schools. There are 13 schools in the vicinity of the corridor and very few students are able to cycle safely to school. Cycling infrastructure must be safe to increase the mode share of cycling and reduce congestion associated with school journeys.
4. Commit to the completion of the Paddington Greenway, including interim measures where necessary – such as a route around the edge of the playing fields to connect Maloney Lane with Walker Avenue.



## Detail design considerations

Moving from east to west, please consider the following during the detailed design of the public domain in the ECC:

### Around the BP garage and Crystal Car Wash

The new footpath (figure 10) needs to have a marked shared path in the short term, as is found further east where the City of Sydney cycle routes begin. However, the wide entrance and exit from the garage forecourt will create point of conflict as cars will turn at speed across the shared path.



Figure 10:  
The new unmarked footpath  
in front on the BP garage  
and Crystal Car Wash

A dedicated cycle path has indicatively been shown to run behind the garage and car wash buildings from Mahoney Lane. This would provide a safer alternative route for people walking and cycling. It could link up with the Paddington Greenway where Rushcutters Creek meets New South Head Road and connect with Rushcutters Bay Park. However, it does not appear that any allowance for a wide bi-directional shared path was made during the recent reconstruction of the garage and the car wash (figure 11).



Figure 11:  
The route of the possible new  
path appears to be blocked by  
the new car wash and garage  
buildings. On the right is the  
junction of the currently-fenced  
Rushcutters Creek and New  
South Head Road

### Maloney Lane to South Street

A path along the south side of the raised railway line links South Street to Mahoney Lane. In the absence of the Paddington Greenway, this path provides a useful connection to Rushcutters Bay from Trumper Oval and Paddington. However, it is narrow and very steep (figure 12). Measures should be taken to make this path more suitable for bicycles.



Figure 12:  
The Mahoney Lane to South Street path is narrow and very steep

### Reddy Street shared zone

We support the proposal to create a landscaped 10km/h shared zone along Reddy Street and Mahoney Lane. Ideally, this will form part of the continuous cycle path that runs behind the BP garage, as shown on the structure plan in figure 6. We do not consider it necessary to remove parking from one side of the lane to create space for a separated path. Bike and cars will be able to share the carriageway once adequate traffic calming has been installed. Landscaping should clarify the parking bays, screen the substation and add visual amenity to this neglected space. However, this route is only useful as a local connection and for access to the rear of new developments. Its grade and indirectness makes this unsuitable as a Principal Bike Network route.



Figure 13:  
Mahoney Lane and Reddy Street, heading east.

### New South Head Road from Mahoney Lane to Ocean Street

The footpath to the south side of New South Head Road is generally wide and landscaped. It will be important to ensure that new developments are set back to maintain the linear park that has begun to be established (figure 14).



Figure 14:  
Widened pavement with tree canopy.

However, the quality of the paving, lighting is poor, the planter boxes are unkempt and there is limited street furniture (figure 15). We support the upgrades proposed to the paving, lighting and street furniture.



Figure 15:  
The poor quality of the paving and landscaping details on the southern side of New South Head Road.

The north side has a very narrow pavement and the future vision for the road should reallocate road space to a wider footpath. In the short term, we support the recommendation by BIKEast to create arcades through a requirement to set the ground floors back approximately 3m. The extra space will provide space for outdoor dining that is protected from the road and the elements and allow street life to develop.

## Conclusion:

We are excited about the possibilities created for walking and cycling by future upgrades to Edgecliff Commercial Centre and look forward to working with Woollahra Council to ensure that the optimal outcome is achieved. Safe infrastructure to support active transport will benefit everyone in the community, reducing congestion and pollution while improving public health and providing more equitable access to employment, services and public transport.

In addition, we are aware that Council is creating a new Active Transport Plan for Woollahra and hope to contribute to the draft plan before it is placed on public exhibition later in 2021. We enthusiastically support efforts to increase the share of journeys taken by bike or on foot, and the provision of infrastructure and lower speeds to make this safe.

Yours faithfully,

***Sarah Bickford***

Bike Planner  
BicycleNSW

<sup>i</sup> Edgecliff Commercial Centre Public Domain Plan, Woollahra Council, May 2021.  
<https://yoursay.woollahra.nsw.gov.au/54579/widgets/283767/documents/204093>

<sup>ii</sup> Sydney Green Grid, Central District. Tyrrell Studio, 2017.  
<https://www.governmentarchitect.nsw.gov.au/resources/ga/media/files/ga/plans/sydney-green-grid-plan-4-central-district-2017.pdf>

<sup>iii</sup> Draft Integrated Transport Strategy. Woollahra Council, 2021.  
<https://yoursay.woollahra.nsw.gov.au/49010/widgets/259007/documents/199125>

<sup>iv</sup> Woollahra – 2030 Our community, our place, our plan. Community Strategic Plan.  
[https://www.woollahra.nsw.gov.au/\\_data/assets/pdf\\_file/0018/190404/WC\\_CPS\\_290618\\_final.pdf](https://www.woollahra.nsw.gov.au/_data/assets/pdf_file/0018/190404/WC_CPS_290618_final.pdf)

<sup>v</sup> Woollahra Bicycle Strategy 2009. [https://www.woollahra.nsw.gov.au/\\_data/assets/pdf\\_file/0003/48144/090831rep-GS11920\\_Woollahra\\_Bike\\_Strategy\\_exhibition\\_draft.pdf](https://www.woollahra.nsw.gov.au/_data/assets/pdf_file/0003/48144/090831rep-GS11920_Woollahra_Bike_Strategy_exhibition_draft.pdf)

<sup>vi</sup> Woollahra Bicycle Strategy 2009. [https://www.woollahra.nsw.gov.au/\\_data/assets/pdf\\_file/0003/48144/090831rep-GS11920\\_Woollahra\\_Bike\\_Strategy\\_exhibition\\_draft.pdf](https://www.woollahra.nsw.gov.au/_data/assets/pdf_file/0003/48144/090831rep-GS11920_Woollahra_Bike_Strategy_exhibition_draft.pdf)

<sup>vii</sup> Bicycle NSW, Policy Framework. [Online as at 19/7/2021] <https://bicyclensw.org.au/our-policy/>

<sup>viii</sup> Draft Integrated Transport Strategy. Woollahra Council, 2021.  
<https://yoursay.woollahra.nsw.gov.au/49010/widgets/259007/documents/199125>

<sup>ix</sup> Draft Integrated Transport Strategy. Woollahra Council, 2021.  
<https://yoursay.woollahra.nsw.gov.au/49010/widgets/259007/documents/199125>

<sup>x</sup> NSW Government, Providing for Walking and Cycling in Transport Projects Policy CP21001, [Online as at 19/2/2021] [www.transport.nsw.gov.au/system/files/media/documents/2021/providing-for-walking-and-cycling-in-transport-projects-policy.pdf](http://www.transport.nsw.gov.au/system/files/media/documents/2021/providing-for-walking-and-cycling-in-transport-projects-policy.pdf)

<sup>xi</sup> NSW Government, Road User Space Allocation Policy CP21000, [Online as at 19/2/2021] [www.transport.nsw.gov.au/system/files/media/documents/2021/road-user-space-allocation-policy.pdf](http://www.transport.nsw.gov.au/system/files/media/documents/2021/road-user-space-allocation-policy.pdf)

<sup>xii</sup> NSW Government, Future Transport 2056 [Online 1/4/2020] <https://future.transport.nsw.gov.au/plans/future-transport-strategy/future-transport-greater-sydney>, Points 3-5

<sup>xiii</sup> City of Sydney, Cycling Strategy and Action Plan 2018-2030 [Online as at 16/7/2021] <https://www.cityofsydney.nsw.gov.au/strategies-action-plans/cycling-strategy-and-action-plan>