

Redfern North Eveleigh Precinct team
Department of Planning, Industry and Environment

22nd August 2022

Submitted via [NSW Planning Portal](#)

To whom it may concern,

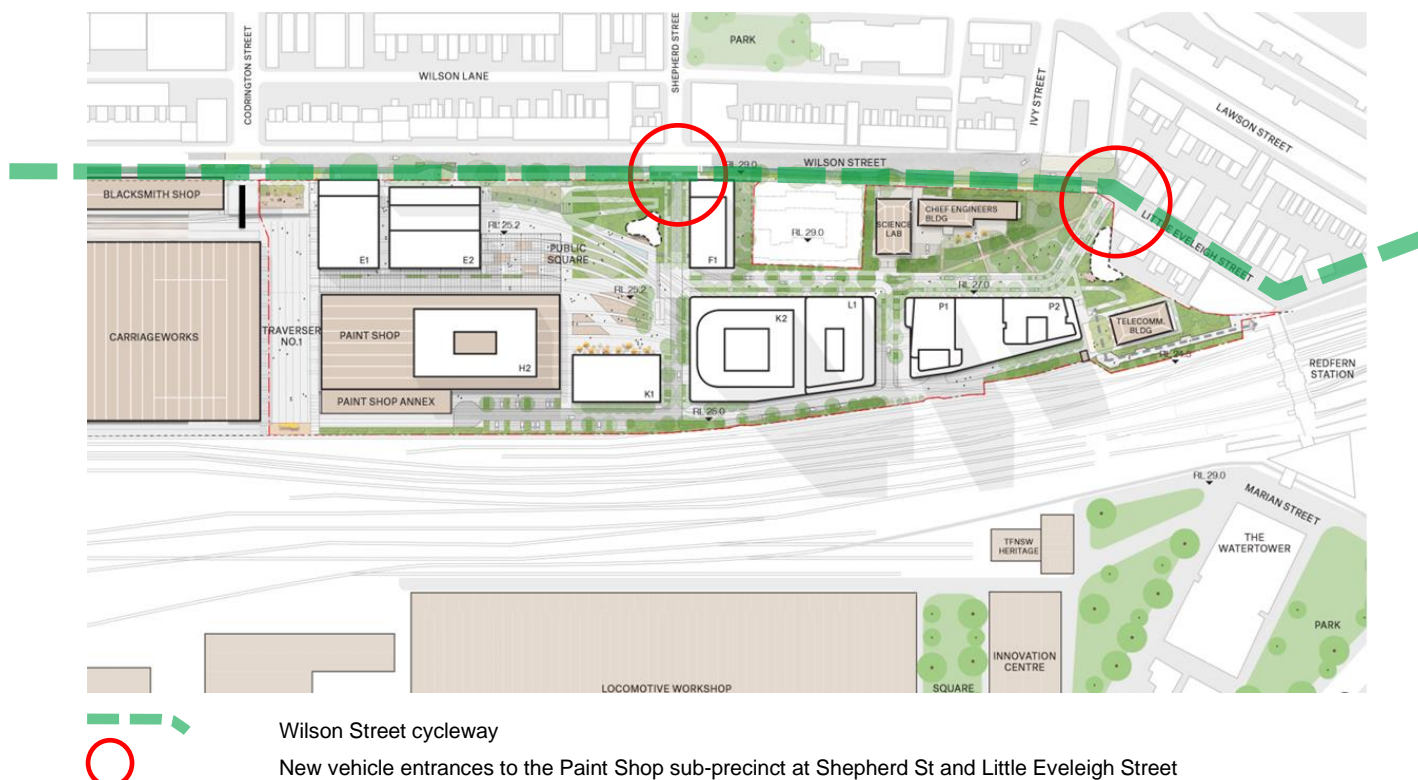
Re: Paint Shop sub-precinct rezoning proposal

Bicycle NSW welcomes the opportunity to discuss our concerns and recommendations regarding the North Eveleigh Paint Shop sub-precinct rezoning. Our submission focuses on the impacts to the Wilson Street cycleway during and after construction (Figure 1), the vehicle movements into and within the site and the lack of future active transport connections to South Eveleigh.

Since opening in 2019, the separated bicycle path on the south side of Wilson Street has provided a safe, comfortable, convenient, direct and beautiful strategic cycleway corridor for over 1200 bike riders per day who live in or travel through the Inner West of Sydney. Delivered by City of Sydney, the cycleway is part of the regional network and connects to Redfern, Surry Hills and CBD via Prince Alfred Park to the east, with Newtown, Macdonaldtown Station, Erskineville and the Inner West network located to the west.

It is recognised that the rezoning proposal does not include detailed engineering for the streets and public spaces of the Paint Shop sub-precinct. However, we respectfully ask that the future design development of the site prioritises walking and cycling over private car use, and maintains the integrity of one of Australia's busiest bicycle routes.

Figure 1: Illustrative master plan (Source: TfNSW/Bates Smart)



The Urban Design Guideⁱ contains high-level diagrams in Section 9.4 to indicate the proposed access and circulation for pedestrians, cyclists and vehicles entering and moving through the Paint Shop sub-precinct.

A shared and fully accessible street network is proposed within the sub-precinct. The project team promises urban design that prioritises walking and cycling, with a key east-west distributor linking Redfern Station with the Carriageworks sub-precinct (Figure 2). Separated cycleways will not be needed and we agree with this approach provided very low speed limits of 10km/hr are applied across the site.

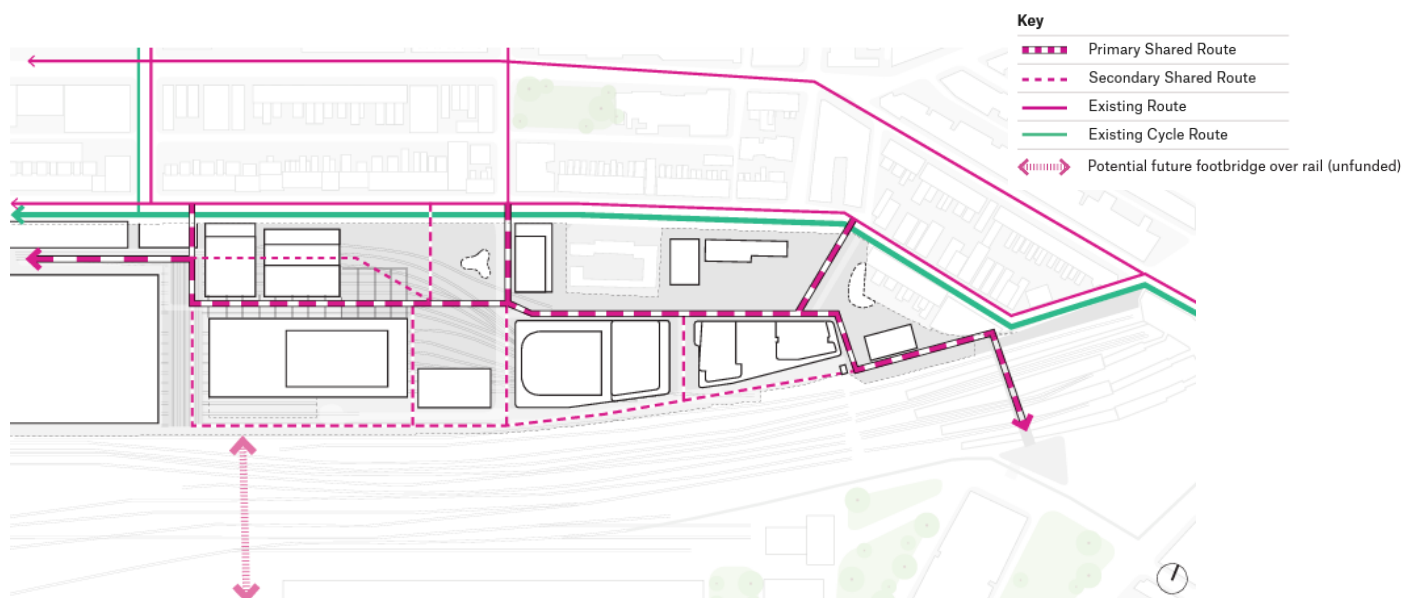


Figure 2: Pedestrian and cyclist movement network (Source: TfNSW/Bates Smart/Turf)

Vehicles entering the site will be concentrated on a new main north-south main road (Figure 3) created by extending Shepherd St south across Wilson St and its cycleway (Figure 4). The road will provide access to loading bays and basement car parks ensuring minimal vehicle movement across the rest of the precinct.

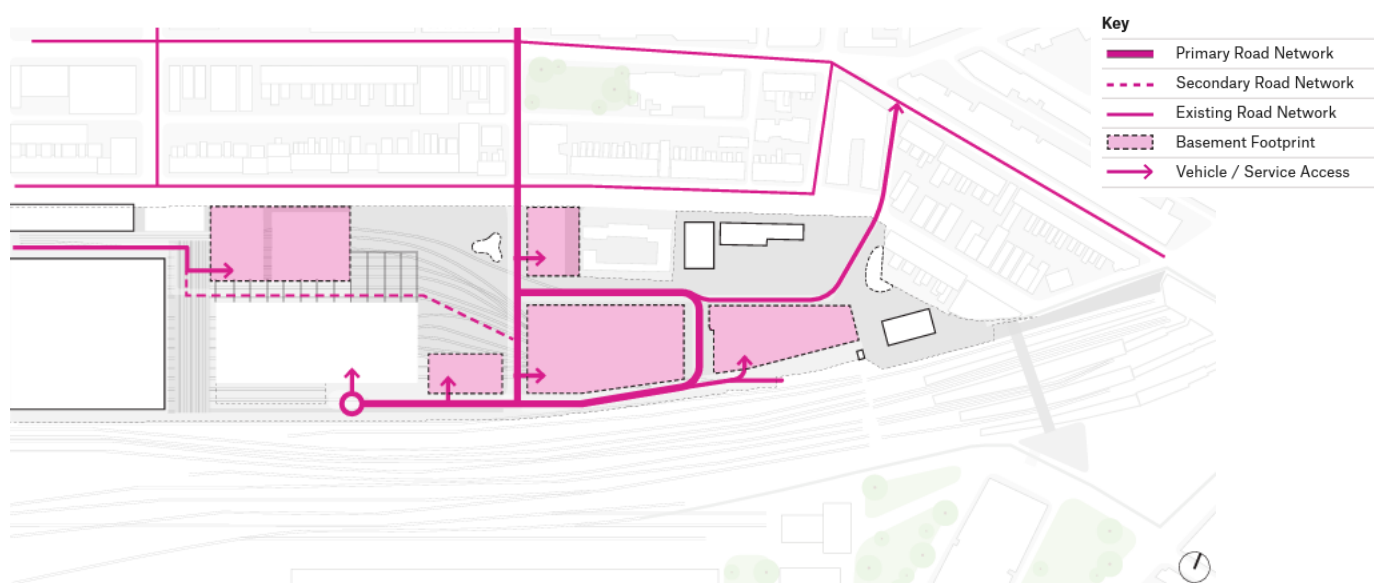


Figure 3: Vehicular movement network (Source: TfNSW/Bates Smart/Turf)

Vehicles will be able to leave the sub-precinct from the two-way Shepherd St entrance, or by looping through the one-way shared central spine up to the end of Wilson Street where it intersects with Little Eveleigh St (Figure 5). Cars would not be permitted to turn right, and will be directed straight ahead via Ivy Lane.



Figure 4: View of proposed vehicle entrance at Shepherd St, crossing the Wilson St cycleway (Source: Bicycle NSW)

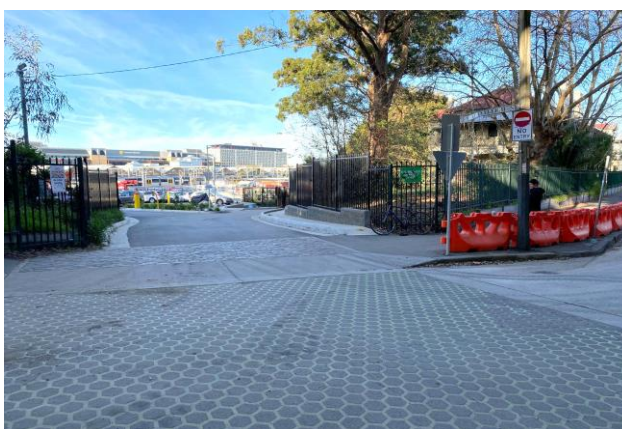


Figure 5: Proposed vehicle exit, corner Wilson St and Little Eveleigh St (Source: Bicycle NSW)

Concerns

1. Safety for cyclists on Wilson Street will be compromised during and after construction

The Wilson St bi-directional bicycle path is safe due to its separation from traffic. The development of the Paint Works sub-precinct as a dense, highly-activated, mixed-use urban centre will lead to high levels of vehicular movement across the protected cycleway via the two new road access points, at Shepherd St and the western end of Little Eveleigh St.

Adding busy road intersections to Wilson St cycleway will be an inconvenience for cyclists and reduce its attractiveness as a regional cycle route that encourages people of all ages and abilities to take to their bikes. Concerns have been raised that drivers crossing the cycleway may not be watching for cyclists to both left and right.

Detours, closures and interruptions to the cycleway during the multi-year development are a major concern, potentially inhibiting active travel for a lengthy period of time and impacting federal, state and council targets to increase walking and cycling mode share. Construction activities at Redfern Station have already led to Little Eveleigh St being blocked to cyclists for many months forcing them to detour and mix with pedestrians and cars on Lawson St. This is inconvenient, indirect and much less safe for cyclists, especially local children.

Another issue is the routing of construction traffic on to the site during construction. Indicative staging for the development shows that the Shepherd St entrance will not be delivered until Stage 4 but this is not reflected in the traffic study.

Recommendations:

- Great care must be taken control any risks for bike riders created by the increased traffic burden. Road furniture such as raised platforms, narrowed streets and extended curbs for pedestrians create a shared space that calms traffic and is safe for pedestrians and cyclists.

- Cars crossing the Wilson St cycleway must give way to bicycles at all times. This priority must be made clear through design elements that favour walking and cycling, enforced with signage and CCTV. If traffic signals are installed at either or both driveways, phasing must favour cyclists and pedestrians over private vehicles.
- In addition, the proposed 30km/h speed limit for the southern extension of Shepherd Street is too high and unacceptable. Vehicles should be subject to the same 10km/h limit that will apply to the shared spaces across the sub-precinct.
- Construction vehicles must be stored within the sub-precinct. It is very important that the Wilson St cycleway remains clear of obstructions, and continues through Little Eveleigh St to Redfern Station, throughout the years of construction.
- Ensure the impacts on the cycleway are minimised at all stages of the development, with access road delivery carefully planned to allow safe truck movements away from areas with high pedestrian and cyclist activity.

2. The change in level from Wilson St has not been resolved

There is a drop of 4m from Wilson Street into the Paint Shop sub-precinct. The Urban Design Report explains that a key move of the masterplan has been the mitigation of the level change to enable a smooth and accessible transition of the neighbourhood into the site. A series of stepped and ramped pedestrian connections to Wilson St are proposed (Figure 6). Section 10.6 includes a series of sections that show how the public spaces could be designed to navigate the height difference, with path gradients designed to meet accessible requirements.

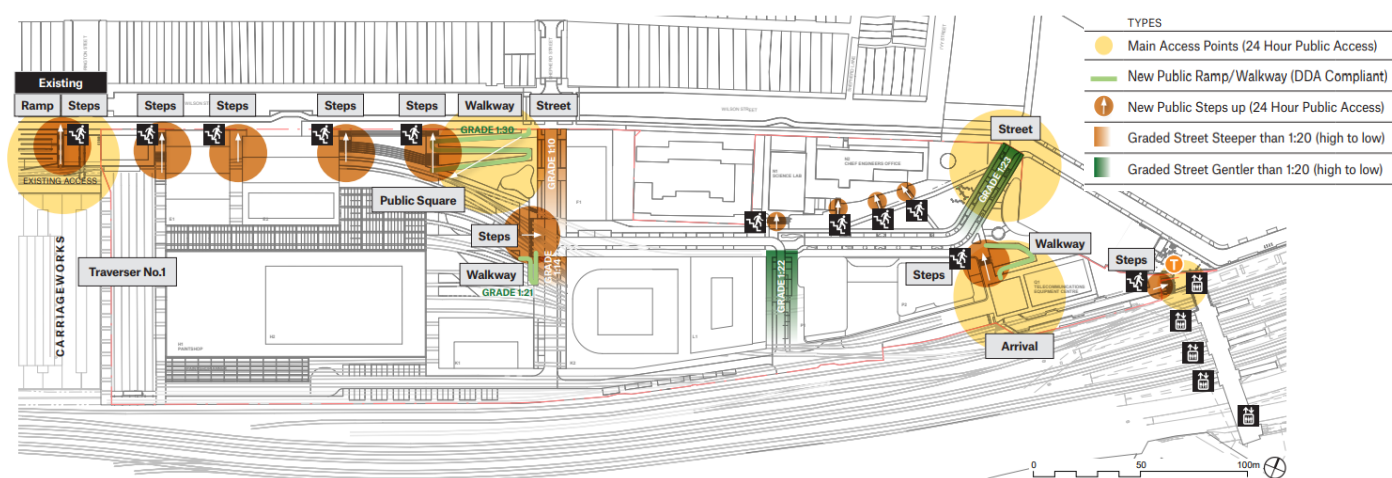


Figure 6: Plan showing access points to Wilson Street (Source: TfNSW/Bates Smart/Turf)

However, it is clearly stated in Section 9.2.7 (page 106) that main vehicular access point at the junction with Shepherd Street **does not meet accessibility standards**. The road gradient will be approximately 1:10.

According to Austroads Guide to Road Design Part 3: Geometric Design: Part 8.5 Gradesⁱⁱ, heavy vehicles will struggle going both up and down hill when gradients exceed 9% (Part 8.5.2). Grades of over 6% should be avoided for lengths over 300m (Part 8.5.4).

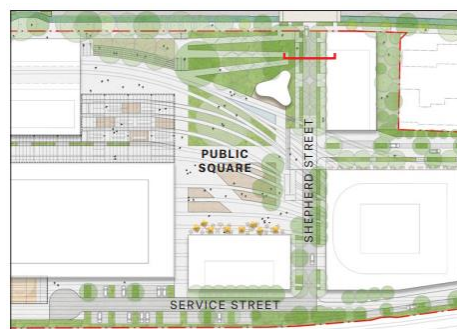
Vehicles leaving the sub-precinct via Shepherd St will need to accelerate to climb up to Wilson Street. Increased speeds will add to the danger of conflict with pedestrians, cyclists and other vehicles, particularly

at the intersection with the cycleway. Drivers facing uphill will have poor sightlines to people and vehicles at the crest of the hill.

In addition, there is a lack of information about how such a steep street will work alongside the park, footpaths and building frontages. There are no long sections showing how the road connects Wilson St to the level of the Fan of Tracks public square, and the only cross section (Figure 7, from Section 10.7.10) ignores the slope. Bicycle NSW is concerned the resulting street will have a canyon feel.



Figure 7: The misleading cross section of Shepherd Street which ignores the change in level (Source: TfNSW/Bates Smart/Turf)



Recommendation:

- Urgent studies must be instigated to clarify how the Shepherd St will work within the precinct to create a safe, accessible and attractive access road. It may be necessary to completely re-think the strategy for vehicular access to the site.

3. The public space outcomes are not guaranteed

Although a series of public spaces are described in the documents, the propose blanket mixed-use zoning will not protect these areas from development. It will be possible for developers to change the built form later without having to ask for a land use change.

Recommendation

- All public spaces must be protected by appropriate zoning to ensure that the open spaces shown in the indicative masterplan are reserved for recreation.

4. There is no commitment to a new north-south cycle and pedestrian connection to South Eveleigh

Eveleigh was torn apart by the rail line and the Eveleigh Railway Workshops. For a century, pedestrian bridges and tunnels connected across the rail corridor until the last bridge was removed in the 1980s. [Community groups](#) have long advocated for a new active transport bridge to be delivered.

The bridge would link South Eveleigh and North Eveleigh, and create a direct active transport connection for new and existing residents living along both sides of the railway corridor, currently forced to take substantial detours to cross the rail tracks.

A footbridge over the rail lines is indicated in the circulation diagram in Figure 2. However, it is not mentioned again in the document except for a page in the Appendix (Figure 8) where the project team states that *'detailed consideration is outside the project scope and does not have NSW Government funding'*.

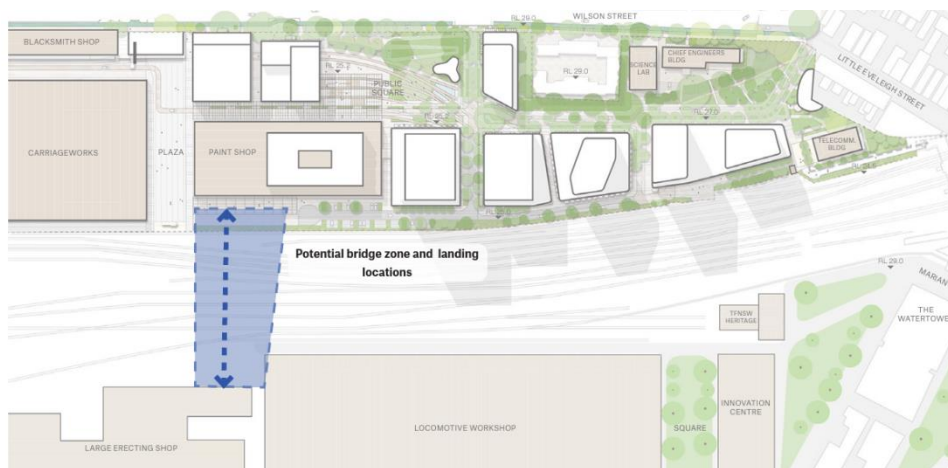


Figure 8: an extract from the Appendix to the Urban Design Report depicting potential landing zone for any future active bridge link (Source: TfNSW/Bates Smart/Turf)

Recommendations:

- Include a new bridge NOW so that it will be fully-integrated into the design, funding and strategic planning of the Paint Shop sub-precinct. The bridge is essential for future connectivity in the Inner West, reducing car dependence as population grows, and must not be excluded from plan for Redfern North Eveleigh.

5. Too many cars will be accommodated in the sub-precinct

The rezoning proposal includes around 500 car parking spaces, estimated using the parking maximums for Zone A under the Sydney LEP 2012 and the requirements set out in section 4.5.4.2 of the Paint Shop sub-precinct Design Guide (160 for employment and commercial floor area, 270 for 381 residential units, 66 for Sydney Trains staff and 20 for Little Eveleigh St residents).

All regional, district and local policy frameworks referenced in the Urban Design Report call for developments to limit car use and *'ensure walking and cycling are the most convenient option ... (and to) reduce congestion on our roads and public transport networks by delivering projects that encourage a shift to walking and cycling'*ⁱⁱⁱ.

All the elements are already in place for Paint Shop to be a car-free development (apart from carshare, service vehicles, and some accessible spaces). There are excellent active transport facilities. It's close to public transport, schools, shops and business hubs. Demand for cars in the inner city is shaped by how attractive and convenient developers choose to make driving relative to other modes. Making car use convenient induces more cars, limiting the potential of the site^{iv} to be a liveable and walkable community.

Recommendation

- Interrogate the car parking provision to further reduce parking and vehicle access requirements.

We look forward to working with Transport for NSW and its consultants to deliver the very best outcomes for active transport in and around the Redfern North Eveleigh precinct. The Wilson St cycleway is one of the busiest, safest fully-separated bike routes in the country and a key link in the Eastern Harbour Strategic Cycleway Corridors.^v The Paint Shop sub-precinct rezoning proposal must prioritise inclusive active transport in the area. In practical terms this means designing in favour of walking and cycling over private car use.

Yours sincerely,



Frances O'Neill

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Bicycle NSW



Peter McLean

Chief Executive Officer
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Bicycle NSW has been the peak bicycle advocacy group in NSW for forty-seven years, and has over 30 affiliated local Bicycle User Groups. Our mission is to 'create a better environment for all bicycle riders', from 8 to 80 years of age, and we support improvements to facilities for pedestrians and cyclists. We advocate for new cycling routes that provide connections to jobs, schools and services for daily transport and recreation trips. Bike riding provides a healthy, low-congestion, low-carbon, economical form of travel great for all ages.

ⁱ TfNSW/Bates Smart/Turf. 2022, July. Public Domain, Place and Urban Design: RNE Masterplan. https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Keelie+Drupal+Documents/Urban+Design+Framework.pdf

ⁱⁱ Austroads. 2021, February 26. Guide to Road Design Part 3. AGRD03-16. <https://austroads.com.au/publications/road-design/agrd03/vertical-alignment/grades>

ⁱⁱⁱ TfNSW Future Transport strategies 2056 <https://future.transport.nsw.gov.au/sites/default/files/media/documents/2021/FutureTransportStrategy2056.pdf>

^{iv} Duranton, G., & Turner, M. A. (2011). The fundamental law of road congestion: Evidence from US cities. *American Economic Review*, 101(6), 2616-52

^v TfNSW: <https://www.transport.nsw.gov.au/operations/walking-and-bike-riding/strategic-cycleway-corridors-for-eastern-harbour-city>