

Director Eastern Harbour City
Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

3rd October 2022

Dear Central Precinct Renewal team,

Re: Central State Significant Precinct rezoning proposal

Thank you for the opportunity to comment on proposals for the renewal of Sydney Central Precinct.

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', and we support improvements to facilities for pedestrians and cyclists. We advocate for new cycling routes that incorporate dedicated paths within both green corridors and the road environment, to provide connections to jobs, schools and services for daily transport and recreation trips. Bike riding provides a healthy, congestion-reducing, low-carbon form of travel that is quiet, efficient and attractive for all ages with the correct infrastructure design.

The renewal of Sydney Central Precinct is a state significant project that aims to transform a large underutilised segment of the CBD into a vibrant place for recreation, work, travel and habitation anchored by a world-class transport interchange and high quality public spaces.

The proposed site comprises approximately 24 hectares of land cut across the cardinal points by railway infrastructure and heritage assets both in and out of commission. The project area is bounded by Goulburn St to the north, Cleveland St to the south, Lee and Pitt Streets to the west, and Elizabeth and Chalmers Streets to the east. Much of the project footprint will sit over the railway lines (Figure 1).

Development at Central Precinct aligns with City of Sydney's strategic planning. The site was identified as suitable for the southern expansion of Central Sydney many years ago. It is ideally located to cater for jobs growth, in close proximity to knowledge—intensive employment clusters. More recently, the railway corridor from Central to Eveleigh has been earmarked for 'innovation' industries and re-branded as Tech Central.

The railyards have carved a large void in the urban landscape and still form a physical barrier to movement in all directionsⁱ. The redevelopment of the land adjacent to and over the rail tracks offers exciting opportunities to repair missing links in the walking and cycling networks. Three new bridges will cross the rail tracks to connect into the surrounding urban fabric.

The masterplan and associated rezoning is supported in principle by Bicycle NSW. However, we have serious concerns about several elements of the proposals in relation to walking and cycling. The key masterplan ambitions, to link Redfern to the Harbour and reconnect east and west, are NOT achieved with the proposed street and laneway layout and the reliance on vertical transportation to navigate level changes.

Bicycle NSW has reviewed the draft Explanation of Intended Effects (EIE), Design Guide, Planning Report, and supporting technical studies. It is clear that it is ambitious and technically challenging to build over active rail lines and there are still many issues to resolve.

This submission focuses on the opportunities for connectivity and active transport at Central Precinct and our concerns around the delivery of optimal infrastructure for cycling, before making a series of recommendations for the next steps of the masterplanning process.

Of course, there is much to be said about important issues such as built form, land use, social infrastructure, density, affordable housing, overshadowing and building heights but that is beyond the scope of our feedback at this stage. We note that City of Sydney has lodged an excellent submissionⁱⁱ and we align with its feedback on all broader planning issues.

The plans are in a fluid and conceptual form. We look forward to further consultation at every stage of the project's development and delivery.

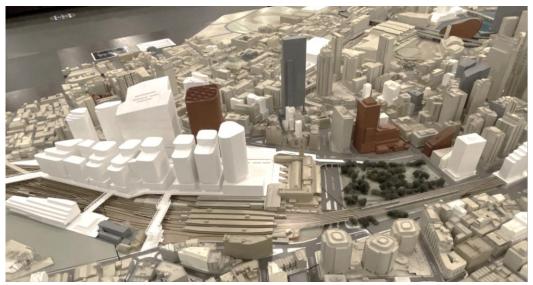


Figure 1: Sydney Central Precinct model, viewed from the east, showing 3 new bridge connections crossing the rail corridor: at Cleveland St, Prince Alfred Park and Devonshire St (Source: Bicycle NSW photograph of model by City of Sydney)





Figure 2: The reference masterplan (Source:TfNSW/Architectus)

The highlights for connectivity

The Place Strategy for Central Precinct establishes Five Big Moves (Figure 3), key city-shaping spatial ambitions that unlock the potential of the precinct and ensure it respond to context and connects to the existing fabric of the cityⁱⁱⁱ.

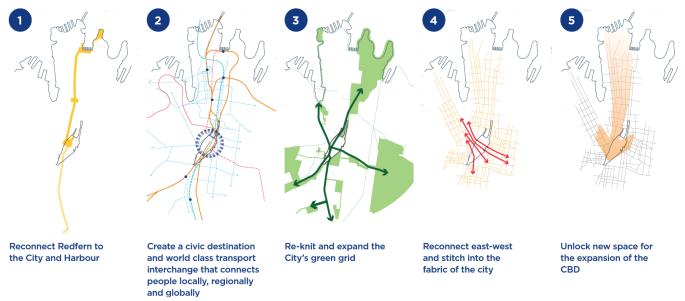
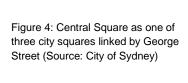


Figure 3: The Five Big Moves (Source: TfNSW)

Central Precinct will contribute to City of Sydney's long-term planning for three new public squares (Figure 4) by delivering deliver Central Square. The three squares are the signature project of Sustainable Sydney 2030-2050iv, developing the vision established in Sustainable Sydney 2030 and progressing well with the transformation of George St in the city's civic spine. Central Square will be a generous public gathering place. It is a much-supported element of the proposed redevelopment.





A series of Urban Design Principles respond to the Big Moves, including *Principle 3: Create a north-south spine*, and *Principle 4: Link east and west*. The diagram in Figure 5 indicates the clear intention to create a north-south spine that wraps around the north of Central Square to negotiate the level changes across the site.

The 2021 Strategic Framework sets out clear Design Principles grouped in to 5 themes. Several of these relate to the public domain, connections and mobility. The new precinct promises to deliver 'new and enhanced open spaces linked by green connections' and 'reconnect the precinct into its surrounds'.

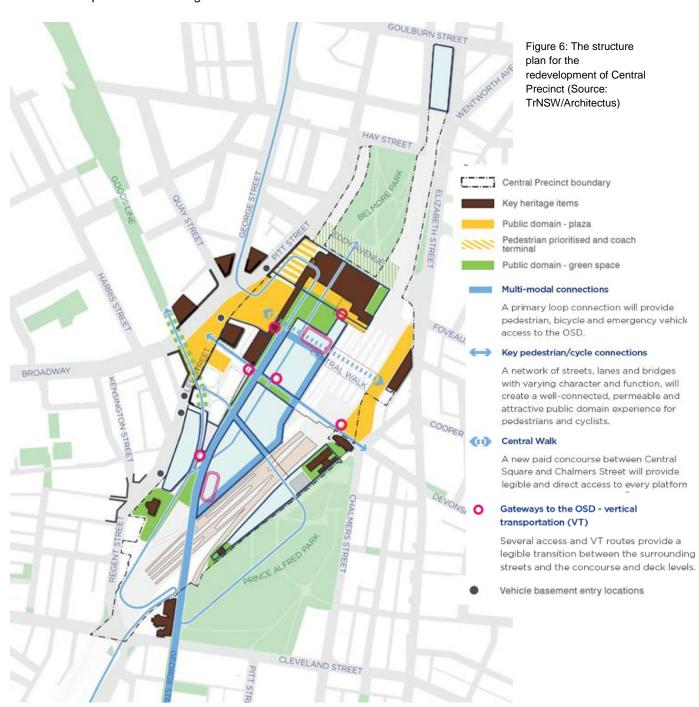


At first glance, the masterplan appears to include positive features for connectivity and the public domain:

- A compact, car-free and walkable precinct that puts people first.
- A modernised station and world-class transport interchange that prioritises sustainable mobility.
- A series of landscaped green and public spaces linked by activated laneways.
- Historic Mortuary Station will open to the community for the first time in a garden setting.
- Three new cross-rail walking and cycling bridges aligned with the surrounding street network to connect Central Station with Haymarket, Chippendale, Redfern and Surry Hills.
- A seamless and convenient pedestrian network with universal access for all.

- New cycling routes to improve north-south and east-west connections through the precinct, including a separated cycleway along Regent Street
- The extension of the Goods Line from Ultimo to the historic Mortuary Station, using currently inaccessible sections. The sandstone railway tunnel lies underneath Central Station and was originally used to transport goods from Darling Harbour.
- Generous end-of-trip facilities throughout the precinct including short-term bicycle parking in multiple hubs.

The structure plan is show in Figure 6.



By overlaying the structure plan with the City of Sydney Bike Network Plan (Figure 7), it is clear that the proposed cross-precinct connections would be of enormous benefit to people navigating the city by bicycle (Figure 8). The key east-west link over the tracks from Devonshire Street to Haymarket is a highlight.

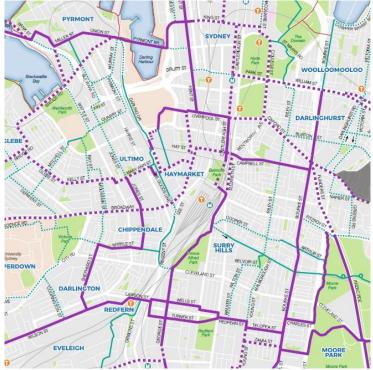


Figure 7: Central Station and the railway tracks currently present a major barrier to east-west active transport between Surry Hills and Chippendale/ Haymarket. A good north-south route has recently been completed to the east of the precinct but there is no direct option along the west side (Source: City of Sydney)

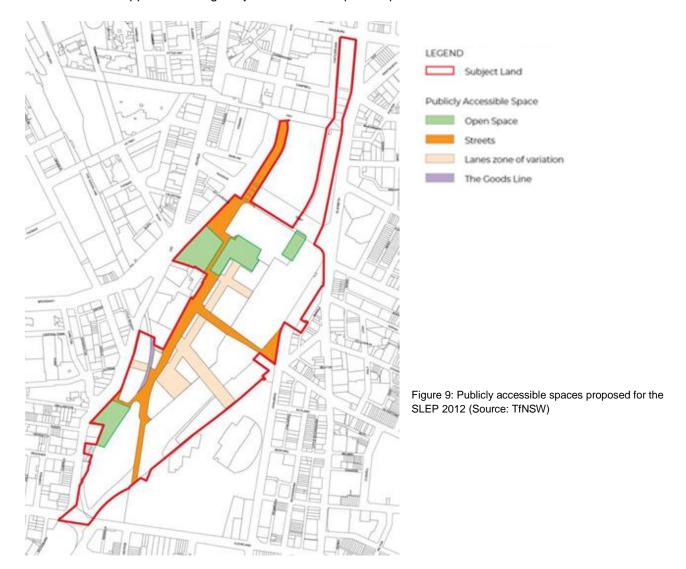




Figure 8: The structure plan overlaid with City of Sydney's 2022 Bike Network Plan shows how the new walking and cycling connections will link with existing and proposed cycling infrastructure in the surrounding streets (Source: TfNSW/Architectus/City of Sydney)

The proposed amendments to the Sydney LEP 2012 land zoning map feature a RE1 Public Recreation zone for open space areas with a predominant recreation function^{vi}, including Central Square, Central Green, Eddy Avenue Plaza and Mortuary Station Park. The allocation of this zone is supported by Bicycle NSW and shows a clear commitment to provide public open space for residents, workers and visitors. This is not the case for the Paint Shop sub-precinct, where a blanket mixed-use zoning is proposed, raising fears for commercial land uses encroaching on the open spaces indicated in the masterplan. Please refer to Bicycle NSW's recent submission.

Even better, the site-specific provisions for Central Precinct under the Sydney LEP 2012 include a publicly accessible spaces map (Figure 9) to define the location and extent of open spaces, laneways and streets, and controls to support the design objectives for each public space.



Our concerns

The conceptual moves for the precinct are very clear about the importance of 'cross-precinct pedestrian and bicycle connections that align with the surrounding street network to greatly improve the intuitiveness and connectivity to the precinct and surrounding suburbs'vii The Urban Design Frameworkviii promises a permeable network of clear access routes through the precinct for cyclists.

However, the cycling network plan (Figure 10) shows convoluted and indirect routes that do not traverse the precinct and meet dead ends. The fantastic links indicated on the structure plan (Figure 6) are cut off.

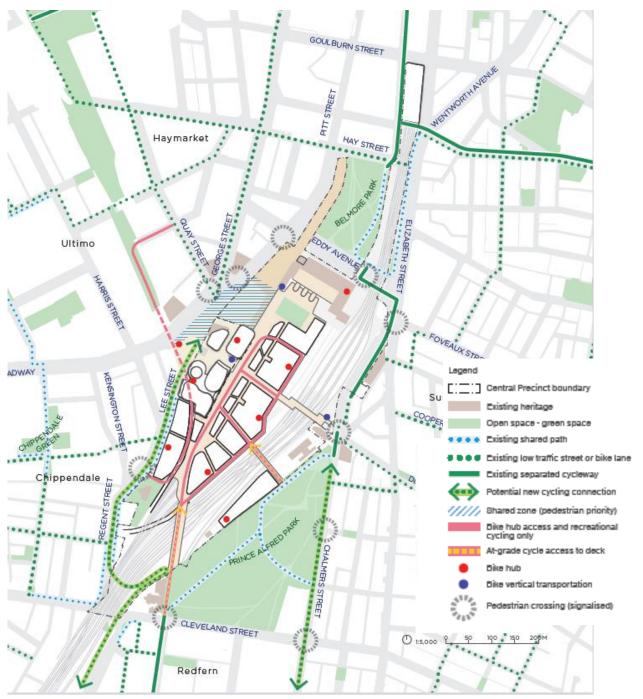


Figure 10: Central Precinct cycle network (Source: TfNSW)

Both the structure plan (Figure 6) and the conceptual spine diagram (Figure 5) show the how a new north-south cycleway from George Street could ramp up around the north side of Central Square to access Central Green, before heading north along Central Avenue to the George Street Bridge.

But this disappears from pedestrian and cycling network maps.

Ramped cycle access is only indicated at George Street bridge and Prince Alfred Park bridge. In all other locations, **vertical transport** to the over station development (OSD) will be in the form of lifts, escalators and

stairs. The critical east-west connection at Devonshire Street bridge requires a lift, as does any access from the west and north.

Bike riders will need to dismount to use lifts. This is extremely inconvenient, particularly for those with disabilities, and weakens an essential component of the masterplan.

There appears to be no way for bikes to enter the northern part of the precinct – including Central Green, Central Square, Western Forecourt and Railway Colonnade. The cycle routes do not go near the train platforms to provide easy access to trains. It is also worrying to note that there are no bike hubs close to the platforms, except at street level at the Eddy Avenue entrance.

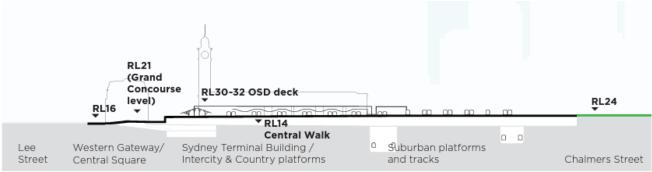
Mortuary Station is meant to provide a key interface between Chippendale and the Over Station Development (OSD) but cyclists wishing to connect to the Goods Line from George Street bridge must use a lift. Alternatively, a convoluted link is indicated from Cleveland Street to the Goods Line entrance via Regent Street.

We understand that level changes create a major challenge to realising the cross-precinct connections but it is **incredibly disappointing** to abandon the ambition to create rideable links through Central Precinct at such an early stage in the development process.



Figure 11: A view of Central Square from the east showing the 3 main levels (Source: TfNSW)

Figure 12: East-west cross sections indicating the key level changes across the precinct (Source: TfNSW)



The plan in Figure 13 shows the how much reliance is placed on vertical transportation to negotiate level changes. Bike access is not easy enough to support the ambitions of a car-free precinct.



Figure 13: Diagram showing different levels and locations of stairs and lifts (Source: TfNSW Urban Design Framework)

Another major concern is that access for bicycles to the heart of the precinct is downplayed at several points in the technical reports.

The structure plan (Figure 6) clearly shows that the through site links are for pedestrians <u>and</u> cyclists. The Urban Design Framework conveys an intention to enable both access and through site movement by bicycle in its opening chapters, benefitting both recreational and commuting cyclists. However, the Transport and Mobility section (from page 100) makes it clear that cyclists will not be welcomed on the OSD. Within the precinct, **only recreational cycling or access to the hubs** is permitted. Bike hubs will be located at the edges of the OSD to minimise cycling across the deck.

The Goods Line extension, the precinct's much-trumpeted offering for active transport, is also slated to be for recreational cycling and access only!

Through cyclists will be directed around the edges of the precinct, using the existing route from Castlereagh to George St, Redfern via Prince Alfred Park, and a 'potential' new separated bicycle path on Regent St and Lee St.

The streetscape diagrams in Figure 14 also suggest that cycling will not be encouraged on the OSD. Although a shared path with tiny cyclists is shown in the cross sections, the text for Central Avenue and the Devonshire Link refer to a 'walking zone for pedestrians and limited vehicles' and a 'pedestrian-only movement zone'. Eastern Colonnade has a 2.5m bicycle path for 'bike hub access and recreational cycling only'.

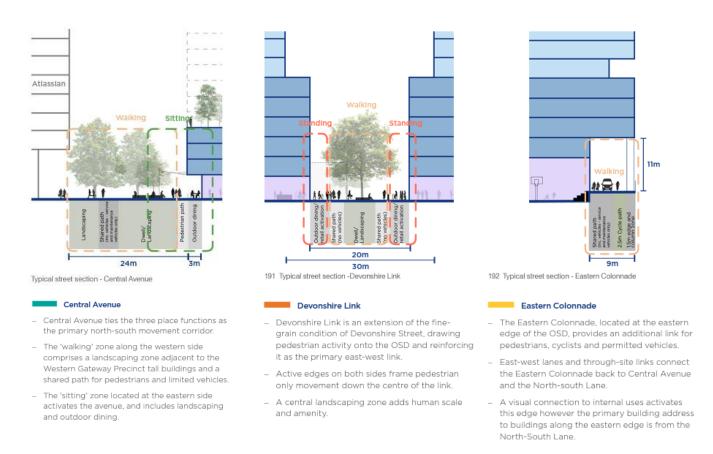


Figure 13: Extracts from the Urban Design Framework to show streetscape types and character diagrams (Source: TfNSW)

The **Railway Colonnade ramp** from Hay Street to the Western Forecourt (Figure 14) is barely mentioned in the masterplan report. This ramp will be retained and presumably has heritage value. It is flagged for use by taxis, coaches and emergency vehicles only. The ramp is very wide and has plenty of space for bicycles as well. Why is it not included in the cycling and pedestrian network to help negotiate the level changes?

The strategy for emergency vehicle access (Figure 15) hints that another ramp will be created as part of the Dexus Fraser development in the Western Gateway sub-precinct. This could also be used by bicycles but it is completely missing from the cycling strategy.

To reiterate, the key masterplan aims to link Redfern to the Harbour and reconnect east and west are NOT achieved with the proposed street and laneway layout and the reliance on vertical transportation to navigate level changes.



Figure 14: A view of Central Precinct from the north-east showing the Railway Colonnade ramp leading to the Wester Forecourt (Source: TfNSW)

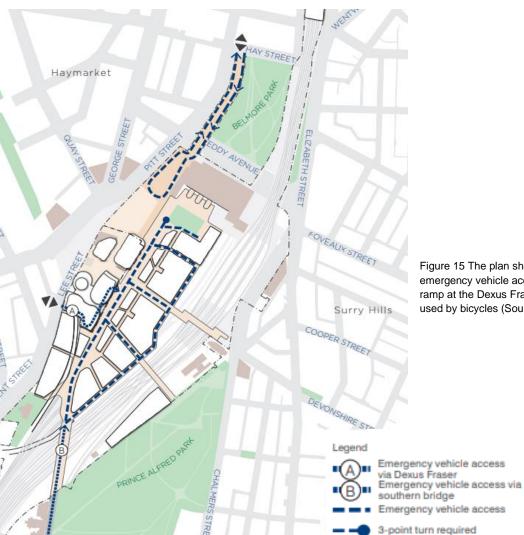


Figure 15 The plan showing the strategy for emergency vehicle access indicates another ramp at the Dexus Fraser site that could be used by bicycles (Source: TfNSW)

CLEVELAND STREET

Recommendations:

- Maintain the strategic ambition to create a precinct that is 'part of the city, and not apart from the city'ix
- Continuous cycleways should be conceived as the skeleton for new development. Regional
 active transport infrastructure cannot be delivered as an add-on 'nice to have' feature that is
 shoehorned into the urban fabric without sufficient space. Central Precinct is in an excellent position to
 design the new public realm to accommodate wide, future-proof cycleways. Developing detailed plans
 for the cycleways at the outset reduces the risk of building construction pushing ahead without
 considering the spatial needs of the routes.
- Aim for step- and lift-free access to the OSD from all directions so that bike riders do not need to dismount and use lifts. Bicycle NSW urges Transport for NSW to work with the design team to include ramped access to the OSD from the outset. Ramps take space and must be carefully integrated into the built form and public domain. It will be impossible to deliver attractive ramps that make a positive contribution to the streetscape without early planning in consultation with all stakeholders.
- Encourage through cycling at low speeds across the OSD. More people using the public space will improve activation. Central Avenue does not have the waterfront locational advantages of Barangaroo that draw people and life to the precinct despite less-than-ideal sun access and wind conditions.
- Clarify the key east-west cycle route from Central Square to Devonshire Street. Note that
 Broadway is to be reconfigured as a boulevard with new separated bicycle paths, wider footpaths and
 landscaping. It will become the major route for cyclists entering the city from the west. Arriving at
 Central Square, a coherent route following the desire line east is needed over Central Precinct to
 Devonshire Street and the Eastern Suburbs.
- **Provide a ramp to connect the OSD with Mortuary Park** at the northern end of George St Bridge to create direct access for bikes to the Goods Line and onto UTS, Darling Harbour and Ultimo.
- Include at least one direct route for pedestrians and cyclists from Redfern heading north that does not require using vertical transportation. This route could make use of the Railway Colonnade ramp or the proposed Dexus Fraser ramp.
- Provide more information about the Dexus Fraser ramp and clarify if access could be created for pedestrians and bike riders.
- Include the Railway Colonnade ramp in the cycle network. This ramp is wide, follows the desire line, navigates over half of the level change to the OSD and connects with the City of Sydney bike network. Its glaring omission from the masterplan at this stage does not make sense.
- The Goods Line should form part of a through cycling route with a generous shared path or separate zones for pedestrians and cyclists
- Confirm feasibility of using Devonshire Tunnel as a bike connection, and make it clear on the bike network map
- Amend the plans to show the walking and cycling routes clearly and consistently across all documents on exhibition. All maps should differentiate between local and regional cycling connections.

- Reconsider the walkway connecting Henry Dean Plaza with Western Forecourt. Bicycle NSW
 agrees with City of Sydney that this is unattractive and impedes the view of the heritage façade of the
 station. If it stays, allow bicycle access to the Western Forecourt and the ramp to Hay Street.
- All main streets on the OSD deck should be designed to accommodate people cycling. Refer to Austroads (6A) Design Standards for Walking and Cycling^x and the TfNSW Cycleway design Toolbox^{xi} for engineering and design recommendations.
- Do not preclude the City of Sydney's plans for changing neighbouring streets:
 - Reallocating space from vehicles to walking, cycling and landscaping on Broadway
 - Harris Street converted to two-way
 - Chalmers Street calmed and narrowed at crossings
 - Elizabeth Street south of Devonshire converted to two-way to calm traffic
 - Foveaux Street and Albion Street converted to two-way east of Mary Street to calm traffic
- Interrogate the parking maximums to see if they could be lowered. Unnecessary parking spaces will encourage car use by workers and residents. Developments in surrounding streets have been delivered with excessive basement garages. Consider sharing these for Central Precinct needs. Amend documents to be consistent regarding parking provision.
- Deliver bike hubs close to the train platforms to ensure easy access to the trains from secure bike
 parking. Include e-bike charging facilities at every hub. More information about the end-of-trip
 provisions and the exact locations of bike hubs, bike lockers, bike racks and chargers must be provided
 in due course.
- Ensure that new cycle infrastructure is inclusive and accommodates all types of bikes, including cargo bikes and tricycles. The width of the paths is critical and it is important to consider turning radius, dropped kerbs, ramps and the design of modal filters to ensure that non-standard bikes not excluded from the network. Cargo bikes will increasingly be used for deliveries and have huge potential to play a key role in a sustainable transport system. Non-standard bikes such as hand-cycles, recumbents and wheelchair bikes offer disabled people independent mobility but are a rare sight on urban streets due to barriers caused by poor urban design. Any measures enabling cycling by disabled people will support a growth in cycling by novice cyclists, children and older people, and improve conditions for those using mobility scooters^{xii}.
- Commit to reducing speed limit on all roads surrounding and within the Central Precinct to 30km/h. 30 km/h has been shown as an optimal speed limit to allow people driving and cycling to share the road safely*iii and is becoming a standard speed limit in many parts of the world. All single lane roads in Spain have been under a 30km/h limit since May 2021 and 30% of UK residents live in 20mph areas*iv. Lower speed limits are an important building block for Vision Zero, an approach to road safety that was launched in Sweden in 1994 with the simple premise that no loss of life is acceptable. The Vision Zero approach has been highly successful and has spread to many other countries. The key policies include prioritizing low urban speed limits, pedestrian zones, physical separation between bicycle and car traffic, data-based traffic enforcement and behaviour-change education*v.
- Prioritise pedestrians and cyclists at all intersections. Traffic light phasing and sensors must favour active modes to encourage more people to walk and cycle. In line with the Road User Space Allocation Policy and other State and Council strategies, small delays to vehicle traffic should never prevent the delivery of safer, more efficient and more attractive active transport infrastructure. Pedestrian and bicycle level of service should be optimised with the following features:

- Instant green on demand for pedestrians and bicycles at mid-block crossings, with induction loop detectors for bicycles/wheelchairs/mobility scooters and fully accessible push buttons.
- Longer crossing times so that pedestrians of all ages and abilities have time to cross safely and without stress.
- Automatic green for pedestrians/bicycles at all signalised intersections so there is no need to press a 'beg button'
- . Raised crossings at unsignalised intersections will slow cars and improve safety.
- Bicycle paths must continue across the raised and signalised crossings so people riding bikes are not required to dismount.
- Establish an active transport strategic reference group to help Transport for NSW and City of Sydney develop bike and pedestrian plans that have grass roots support, effective objectives and continued oversight by committed local advocates. Bicycle NSW and Bike Sydney would be delighted to find motivated cyclists and Walk Sydney could nominate pedestrian advocates. The group should include urban designers and place experts. It is important for all traffic, transport and streetscape projects to be reviewed by a committee with a range of skills to avoid a one-dimensional outcome. Engagement must be commensurate with the complexity and significance of Central Precinct. Representatives of First Nations communities would help ensure implementation of Connecting with Country principles.
- Provide roll—on facilities for bicycles on all local and regional trains, light rail, buses and intercity coaches as soon as possible. Bicycle NSW have advocated for bikes to be carried unboxed on regional train for many years now. Combining cycling with public transport allows longer and more complicated trips, expanding the reach of public transport, encouraging tourism and cutting deep into car dependency. Multi-modal options provide the 'secret sauce' for an integrated transport network!

Conclusion:

As City of Sydney wrote in its submission:

'Central Precinct is a once-in-a-lifetime opportunity to help grow a stronger and more competitive Sydney. If balanced with the need to conserve the unique heritage values of the precinct and maintain its current role as a vital transport interchange, the successful development of the Central Precinct could deliver flow-on benefits for Greater Sydney's global standing and contribute to its economic diversity and resilience'.

Bicycle NSW is very excited by the potential of the Central Precinct redevelopment to deliver game-changing upgrades to the active transport network. The masterplan reflects a genuine attempt to address the barriers to cycling to and through Central Station but, as discussed, the proposals are flawed and inconsistent. Safe infrastructure to support walking and cycling will benefit everyone in the community, reducing congestion, noise and pollution while improving public health and providing more equitable access to employment, businesses, services and public transport.

By Connecting to Country, the project shall contribute to spanning the cultural divide with stories linking people to the built and natural environment. Central is a place for people, not just a grey transit point. Platform 1, for instance, was a major staging post for the Stolen Generations whilst Prince Alfred Park was a popular campsite for Gadigal landowners of the Eora Nation dispossessed of their homes by burgeoning colonial infrastructure. The underlying narrative integrates these physical elements and adds to the character, beauty and legibility of the site.

Bicycle NSW looks forward to working with Transport for NSW and City of Sydney to progress the next stage of the masterplanning process. Please reach out with any questions or help needed. If requested, we would

be delighted to assist with advocating for optimal active transport infrastructure through our connections with politicians and decision maker at all levels of government.

Yours faithfully,

Sarah Bickford

Souch Richard.

Bike Planner Bicycle NSW Peter McLean

Chief Executive Officer Bicycle NSW

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https://www.cityofsydney.nsw.gov.au/-/media/corporate/files/publications/city-of-sydney-submissions/central-precinct-rezoning-proposal/city-of-sydney-submission---central-precinct-rezoning-proposal.pdf?download=true

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^{iv} City of Sydney. 2022. Sustainable Sydney 2030—2050 Continuing the Vision. https://www.cityofsydney.nsw.gov.au/-/media/corporate/files/projects/vision-setting/your-say-our-plan-sustainable-sydney-2030-2050/ss2030-2050_vision_draft-1.pdf?download=true

^v Transport for NSW. 2021, March. Central Precinct Strategic Framework. https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/Central-Strategic-Framework.pdf?la=en

vi Transport for NSW. 2022. Central State Significant Precinct Planning Study. https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Lisa+Drupal+Documents/0+Planning+Report.pdf

vii Transport for NSW. 2021, March. Central Precinct Strategic Framework. https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/Central-Strategic-Framework.pdf?la=en

viii Transport for NSW. 2022. Central Precinct Urban Design Framework. https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Lisa+Drupal+Documents/Attachment+03+Urban+Design+Framework.pdf ix City of Sydney. 2022, Sept 27. Submission to Central Precinct rezoning proposal.

^x Austroads (6A) Guide to Walking and Cycling Design, https://austroads.com.au/publications/road-design/agrd06a

 $^{^{}xi}\ https://www.transport.nsw.gov.au/system/files?file=media/documents/2022/Cycleway-Design-Toolbox-Web_0.pdf$

xii Wheel for Wellbeing. 2020. A Guide to inclusive cycling. https://wheelsforwellbeing.org.uk/wp-content/uploads/2020/12/FC_WfW-Inclusive-Guide_FINAL_V03.pdf

xiii City of Yarra - 30km/h speed limit: pre-trial final report, 2017.

xiv O'Sullivan, F. (2020, November). Why Europe is slowing down. Bloomberg CityLab. https://www.bloomberg.com/news/articles/2020-11-18/speed-limits-are-dropping-in-europe-and-the-u-k <a href="https://www.bloomberg.com/news/articles/2020-11-18/speed-limits-are-dropping-in-europe-and-the-u-k <a href="https://www.bloomberg.com/news/articles/2020-11-18/speed-limits-are-dropping-in-europe-are-dropping-in-europe-are-dropping-in-europe-are-dropping