

27th October 2022

Western Distributor Network Improvements
Transport for NSW
PO Box K659
HAYMARKET NSW 1240

Submitted via project portal
westerndistributor@transport.nsw.gov.au

To whom it may concern,

Re: Western Distributor Road Network Improvements

Thank you for the opportunity to comment on the proposed changes to the Western Distributor between Anzac Bridge and Sydney Harbour Bridge.

Bicycle NSW has studied the Review of Environmental Factors (REF)ⁱ and attended a webinarⁱⁱ at which the project team clarified Transport for NSW's rationale for the changes and discussed each aspect of the proposal in detail. The project involves:

- constructing a new on-ramp from Fig Street to the Western Distributor
- increasing the number of traffic lanes on Allen Street from 3 to 4 lanes and removing parking
- removing a signalised pedestrian crossing leg at the intersection of Allen and Harris streets
- widening the Pyrmont Bridge Road off-ramp from one to two lanes
- converting a zebra crossing to a signalised pedestrian crossing at the Pyrmont Bridge Road off-ramp
- installing 3 new electronic variable speed gantries on the Anzac Bridge to help manage traffic flows

The map in Figure 1 shows the project footprint.

Bicycle NSW objects to all elements of the Western Distributor Road Network Improvements.

We respectfully submit that this is one of the few major infrastructure projects for which we make a **sole recommendation** – for Transport for NSW to abandon any future attempts to create more capacity for vehicles on the Western Distributor and instead redirect funds into sustainable projects that support active transport and urban liveability.

Upgrading an above-ground motorway that dumps traffic in the heart of Sydney's CBD is completely at odds with Transport for NSW's Future Transport Strategy, the Movement and Place framework and a raft of excellent associated policies. It undermines ambitions outlined in the Pyrmont Precinct Place Strategy (PPPS) and compromises Sustainable Sydney 2050's vision for a liveable, decongested, decarbonised city.

This submission outlines our key concerns about the project as advocates of sustainable mobility, active transport and better place-focused city making.

Bicycle NSW would like to acknowledge City of Sydney for its excellent and detailed submissionⁱⁱⁱ. The City's commitment to evidence-based best practice has enabled Sydney to make great progress as a walkable, liveable city. We also thank Walk Sydney^{iv} and 30Please.org for their feedback and research which has informed this document.

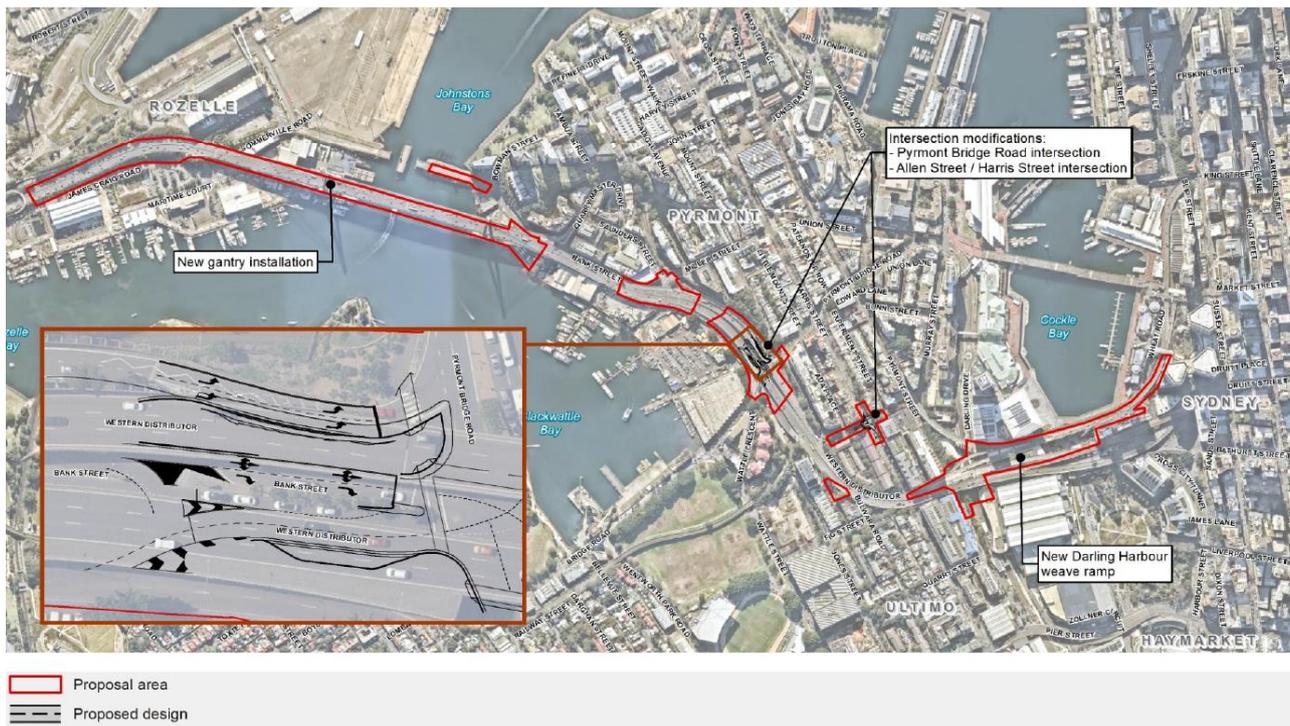


Figure 1: The footprint for the project to ‘improve’ the Western Distributor between Anzac Bride and the Sydney Harbour Bridge (Source: TfNSW REF)

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.

Major concerns:

Our issues with the project are summarised as followed:

- **Increased vehicle capacity is never a congestion solution**

The proposal appears to be the last gasp from a fossilised section of Transport for NSW that prioritises Level of Service for vehicles and still hasn’t grasped the concept of induced demand. It is clear that the project proponents are applying ‘predict and provide’ modelling rather than the ‘vision and validate’ approach now embedded in forward-thinking transport planning processes.

When you build for more cars, you get more cars. Induced demand - the dynamic in behavioural economics proven repeatedly and universally since the 1960s^v - means that additional traffic lanes increase traffic congestion.

The new Future Transport Strategy^{vi} states that ‘building our way out of congestion is not a sustainable solution and we must get more from existing assets. Planning for a dynamic network that improves customer choices and options is key to the sustainability and resilience of our future network’. Better public and active transport is key to nudging people away from private car use.

Vehicle counts have been fairly stable in Pyrmont for over a decade^{vii}. All transport planning for an important inner-city area must aim to further decrease vehicle use to reduce the impact and dominance of cars, vans and trucks on the public realm. However, the proposal to remove pedestrian crossings and parking spaces to reduce delays at intersections will induce **more surface traffic** in the peninsula.

- **Through traffic is not welcome in a 21st Century CBD**

An important rationale for the huge NSW Government investment in WestConnex was to divert through traffic away from the CBD. From the Rozelle Interchange, vehicles heading south will go to St Peters to connect with the Gateway, the M5/M8 and the M6. Those going north will use the Western Harbour Tunnel to reach the M1. An inner bypass using the streets of Pyrmont would no longer be needed. The demand for a route to the Sydney Harbour Bridge via the Western Distributor would be greatly reduced.

WestConnex should allow the Western Distributor to be deprioritised as a transport corridor. The hideous tangle of concrete that scars the heart of Sydney should be rationalised and gradually dismantled. The huge swathe of land it occupies should be put to better use. The WestConnex website clearly states that the project aims to *'move traffic and heavy vehicles to the underground motorway, reducing traffic on local streets and creating opportunities for urban renewal'*^{viii}. Urban renewal should deliver walkable, liveable cities not corridors for more cars.

Alarming, WestConnex is only mentioned very briefly in the 300-page REF, despite its obvious connection to the proposals for increasing capacity of the Western Distributor. Are Transurban and TfNSW concerned that WestConnex will fail to reduce local traffic, as predicted by many transport planners? Will it instead drag more traffic towards the CBD, choking up the shiny showpiece Rozelle Interchange before the construction dust has settled? Will inner Sydney be plagued by toll-avoiders who will still use surface roads and the Western Distributor? Are the changes to the Pyrmont off-ramps an attempt to send the pinch point further east so Rozelle performs well for a little longer?

- **All movement and no place – misalignment with adopted NSW Government policies**

A project that expands the capacity of a city centre motorway contradicts overarching TfNSW policies and plans, **seriously eroding confidence in the value of strategic planning.**

Since 2019, there has been a seismic shift in NSW policy direction, framed by innovative thinking around 'place' after 70 years of car-centric planning that focused on movement to the detriment of community, urban amenity, walkability, public health and air quality. The Movement and Place Framework takes an integrated cross-governmental approach to infrastructure projects and land use design. It is bolstered by two policies published by Transport for NSW in early 2021 that require State projects to prioritise road space for active transport: *Road User Space Allocation Policy*^x and *Providing for Walking and Cycling in Transport Projects Policy*^x. The former establishes a road user hierarchy that considers pedestrians first and private cars last and allocates road space according to need.

The new Future Transport Strategy^{xi} further embeds movement-and-place thinking and promises to support car-free mobility and urban vitality by delivering 'connected walking and cycling networks which integrate with public transport and green infrastructure'. Public transport into the heart of the city will be transformed by Sydney Metro West. Metro as a mode must be reinforced by more attractive walking and cycling in precincts such as Pyrmont where new stations are located.

However, during the webinar^{xii} the project team were explicit in clarifying that the proposals will only benefit vehicle movement. Active transport improvements are NOT part of the project. Any upgrades to active transport, bus priority or placemaking will come later. This directly contravenes the *Providing for Walking and Cycling in Transport Projects Policy*^{xiii}.

- **It is unacceptable to prioritise cars over people walking in the inner city**

The majority of customers within Pyrmont and the CBD are pedestrians but they are not considered by this project. The REF acknowledges that walking to work in Pyrmont accounts for 36.8% of mode share (page 74), possibly the highest percentage for any Sydney suburb. Pedestrian comfort and safety must be a key planning priority, requiring widened footpaths, reduced traffic lanes, slower traffic speeds, increased tree canopy and separated bicycle infrastructure.

Instead, pedestrians are faced with the proposal to remove a signalised pedestrian crossing at the intersection of Allen Street and Harris Street and convert the zebra crossing on Bank Street at Pyrmont Bridge Road to a signalised crossing, making walking journeys less convenient. The additional on-ramp at Fig Street, expanded off-ramps to Pyrmont Bridge Road and Allen Street and the removal of parking on Allen Street give space to cars that ought to be allocated to pedestrians and cyclists. Traffic volumes will increase, degrading amenity and safety for the **majority** of road users.

There is nothing in this project to enhance human accessibility in and around Pyrmont. It is exclusively for motor vehicles even though marginal improvements in network efficiency will quickly be swallowed up by induced demand. Back in 2018, Future Transport 2056 stated *'it is essential to ensure that transport projects contribute positively to society, the environment and the economy. An accessible public and active transport network will mean more choice for people with mobility constraints and will make travel easier for everyone, whatever their age, ability or personal circumstances'*. How did this project miss the memo?

- **The proposal offers nothing for bike riders**

The Providing for Walking and Cycling in Transport Projects Policy^{xiv} requires transport infrastructure projects to deliver improvements to cycling facilities. The Western Distributor upgrades offer absolutely nothing to bike riders – in fact, additional traffic on Harris Street and other local roads will impact cyclist safety and comfort.

Major missing links could be repaired. For example, there used to be a shared path over Darling Harbour attached to the south side of the Western Distributor, from foot of Bathurst Street to the west side of Harris Street, above all the traffic (Figure 2). Only a part of this still exists, with lift access from west side of Darling Harbour. Crossing Darling Harbour by bike now involves negotiating a very busy pedestrian precinct. The shared path should be reinstated, taking advantage of the huge disruption needed to build the on-ramp to deliver a beneficial outcome for walking and cycling. There is a narrow footpath on the north side of the Western Distributor, but only steps at either end. Ramps could be provided and the path widened to shared path standards, creating another active transport link over Darling Harbour from Murray St at Allen St to Druiitt St.



Figure 2:
The south side of the Western Distributor where there used to be a shared, access by a ramp from Bathurst Street. (Source: Inner West Bicycle Coalition / Google Maps)

Sometimes small changes to the public realm can make an enormous difference to access by bike. This project could address the section of Bridge Rd from Wattle St to Bulwara Road and Harris Street, where it is difficult to ride. The shared path past the Fish Market needs repair and widening, and better kerb ramps. The refuges and islands under the flyovers need more space so several bikes can wait to cross at the same time. A raised crossing on the exit ramp off the Anzac Bridge could replace the traffic lights.

We ask that local Bicycle User Groups (BUGs) and Bicycle NSW are consulted to identify all the issues that could be resolved by this project, if it goes ahead.

- **Safety will NOT be improved in a meaningful way**

Bicycle NSW supports WalkSydney's view that this project is about traffic efficiency not safety^{xv}.

The crash statistics quoted in the REF have been massaged to support the investment case. The REF claim of 100 crashes occurring eastbound on the Western Distributor is inaccurate and includes 'near misses'. Based on publicly available road safety data, between 2007 and 2020 there was one fatality, and an average of 2.7 serious injury crashes per year. The total number of crashes during this 13-year period was less than 40^{xvi}.

TfNSW shows a serious lack of commitment to Vision Zero by choosing to invest in a small section of a motorway rather than evidence-based road safety interventions that would reduce vehicle trauma more effectively, such as implementing a 40km/h speed limit across Sydney.

Between 2007 and 2020 more than 30 people were killed crossing streets in the CBD. TfNSW's own economic investment guide requires road safety investments to be targeted where the impact will be greatest. There are five times as many people walking in the Sydney streets as driving cars on motorways and interventions to improve pedestrian safety should be prioritised.

Note that no analysis of how road safety along Harris Street may be worsened has been undertaken as part of the REF. We are extremely concerned about the risk of future fatalities on Harris St as a result of the changes to the off-ramps that increase vehicle volumes and speeds along the street.

- **NSW Government and City of Sydney strategies will be undermined**

Pymont and Ultimo have been subject to intense, multi-agency planning processes over several years. The Pymont Peninsula Place Strategy (PPPS) and the Pymont Ultimo Transport Plan (PUTP) are critical documents developed by DPE in collaboration with City of Sydney to guide development of the area.

The PPPS has several directions that relate to reinforcing Harris Street as the peninsula's historic main street. It notes that heavy vehicle traffic along Harris Street hinders the pedestrian or cyclist experience. The traffic function of the street will be reduced. Space will be reallocated from vehicle and parking lanes to accommodate wider footpaths, new landscaping, additional pedestrian crossing points and a potential street-based rapid transit service, with hubs of activity at each stop (Figure 3). Harris Street will be transformed into 'a diverse, affordable, eclectic place of enterprise and economy - linking the peninsula to the broader Innovation Corridor'.

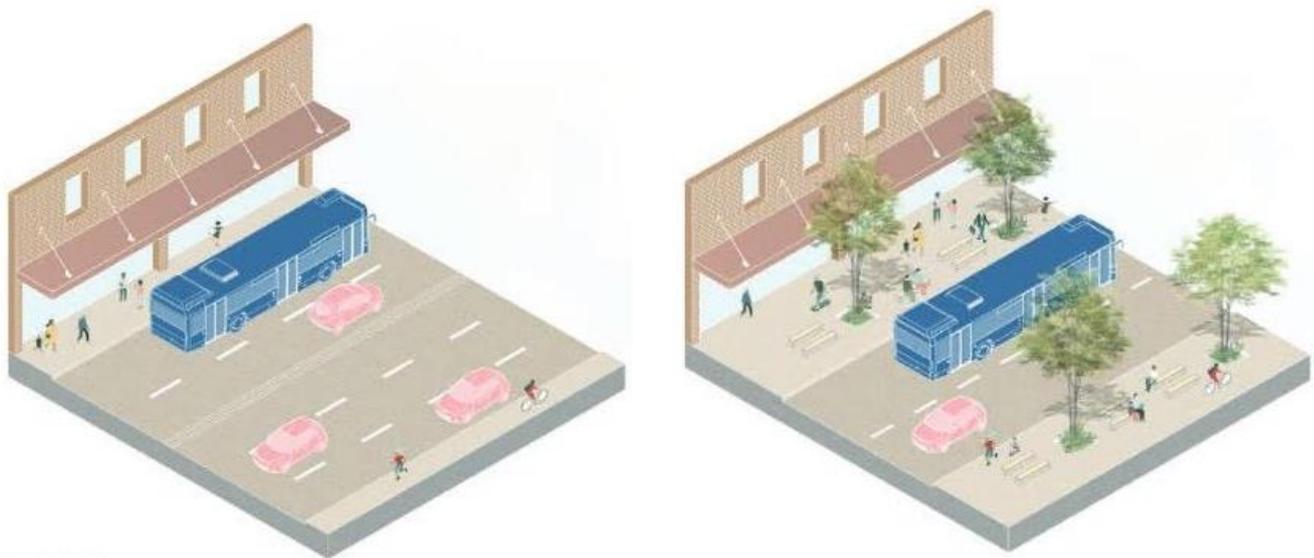


Figure 3: The agreed vision for a future Harris Street involve reducing traffic lanes, widening footpaths, increasing the tree canopy. The street will once again be Pymont's high street. (Source: DPE/Hassell)

The REF claims that the project will be 'delivering desired place-based community and social outcome benefits' (page 6). By reinforcing the traffic function of the Western Distributor, local streets will be less congested, allowing placemaking projects 'in the future'. But this is followed by an acknowledgement that motorists will be re-routed through Harris Street as part of the proposed movement restrictions at Pymont Bridge Road and Bank Street intersection. This will include concrete trucks that will need to use Harris Street to reach their plant due to the removal of the u-turn at Bank Street. There is no way Harris Street can evolve into the pedestrian-friendly spine of the community under such conditions.

This begs the question: How does a motorway upgrade that only addresses traffic efficiency possibly square with established visions for a walkable, liveable city? Future Transport 2056^{xvii} is quoted in the REF under *2.1.1 NSW Policy Context* as justification for the motorway's upgrade. The REF claims the proposal aligns with the goals of Future Transport 2056, listed as 'a customer focus, successful places, a strong economy, safety and performance, accessible services, and sustainability'. But as Future Transport 2056 and the newly-released Future Transport Strategy make very clear, all these future-proofing goals necessitate a mode shift away from private car use towards active and public transport.

The REF stated that ‘active transport amenity upgrades and revitalisation of underused spaces were not captured within the scope of the proposal as they require wider network and land use consideration’. **It is unacceptable to push ahead with this project without determining optimal future outcomes for placemaking and active transport.** Opportunities for achieving place and sustainable transport goals may be literally concreted over by this project, locking out change for decades.

- **Inappropriate and selective traffic modelling has been applied to justify the proposal**

Although we lack the skills to investigate all the modelling presented, we concur with the City of Sydney that the methods used are flawed, with figures manipulated to augment the case for the project.

Bicycle NSW would like to highlight City of Sydney’s analysis^{xviii} of data presented in the REF that shows that the existing off-ramps will accommodate the modelled demand without the additional lane proposed. From the intersection with Pyrmont Bridge Road to the merge point, the off-ramp is over 500m long. The REF cites modelling outputs that show that in 2033, without the proposal and with the assumed growth in traffic, the queues only reach 174m in the AM peak and 108m in the PM peak (page 83) – far shorter than the existing 520m of ramp. As such, **the need for additional off-ramp lanes is unfounded.**

- **Construction will create major impacts for active and public transport modes**

Approximately two years of major construction works will impact thousands of residents and visitors, as well as the L1 light rail and 501 bus services. Operational impacts to bus services may be permanent.

The REF downplays significant impacts on Darling Harbour open space during the construction of the weave ramp from Fig Street. The work zones and site compounds will interrupt movement along the main north-south pedestrian corridor in Darling Harbour that connects the Chinese Gardens and Tumbalong Park to Harbourside and Pyrmont Bridge. Continuous access is assured but a constricted pedestrian thoroughfare will be very unpleasant in such a high-activity area.

The REF admits (Section 6.1.3) that there will be disruption to pedestrians and cyclists using existing shared paths, pedestrian paths and street crossings, but promises that changes to routes would be localised to work areas. However, what appears to be a small detour can create major barriers to movement, particularly for children, elderly and the less-able. It is essential to consider the wider network when designing detours to minimise inconvenience for pedestrians and cyclists of all ages and abilities.

We ask that Bicycle NSW is closely consulted on all detours and changes to pedestrian and cycling facilities so that we can help deliver optimal routes that are accessible to all road users.

- **The project is not sustainable in any way, shape or form**

The Western Distributor upgrade fails to meet criteria for environmental, economic, and social sustainability and should not receive ministerial approval or public funding.

Environmental sustainability:

The transport sector contributes between 25-30% of Australia’s CO₂ emissions^{xix}. There are over two million car trips every day in Sydney that are less than 2km in length^{xx}. Bringing more vehicles into the CBD at the expense of active transport will increase unnecessary car use and harmful tailpipe emissions. This does not meet Sustainable Sydney’s aspirations to be ‘2. a leading environmental performer^{xxi}’

In addition, the removal of 71 mature trees in Darling Harbour and at the intersection of Allen St and Harris Street (Appendix C, page. 43) will contribute to the dangerous heat sinks of the tree-depleted Eastern Harbour foreshores. At a time when 40 degree-plus days are on the rise, mature trees are essential for liveability and walkability. We are in a climate emergency. **Loss of tree canopy is not acceptable for construction projects that encourage car travel.**

Economic sustainability:

Congestion currently costs the Australian economy over \$19.1 billion annually and predicted to rise to \$39.8 billion by 2031^{xxii}. By 2030, the cost of traffic congestion to Greater Sydney will be \$12.6 billion per year^{xxiii} without a rapid mode shift to public and active transport. As discussed, building for cars will bring more cars and only contribute to the problem, while urban renewal projects that improve streetscapes, provide for walking and cycling and calm (or exclude) traffic improve economic activity. This is because human-paced traffic stimulates street commerce. High streets come to life, property prices appreciate and international talent is attracted^{xxiv}. An upgraded above-ground motorway carving through the Pymont Peninsula has no place in an emerging innovation corridor.

Whilst traffic induced congestion is a dead weight upon the economy, investment in bicycle infrastructure has been measured by Queensland Government's department of Transport and Main Roads to return a net social benefit of \$5 for every dollar spent^{xxv}. This is a conservative acknowledgement of the health, safety and decongestion benefits of active transport. In the current economic climate, it is inconceivable for the NSW Government to default to economic damage when there is the opportunity for a 500% social investment return.

The REF does not disclose the cost of the project. Once published, it is certain that the figure will never include costs related to wasted pedestrian time, inactivity-related health issues due to less walkable streets, or pollution impacts.

Social Sustainability:

As clearly stated in the Future Transport Strategy, *'investment in walking, cycling and micromobility programs will give people more choice in how they move. The benefits of more people choosing these options include improved air quality and urban amenity, reduced car use and traffic congestion, and a general improvement in the health of communities'*. It is particularly important to provide a full range of mobility options to those unable to drive, ensuring equal access to economic and social opportunities.

An enhanced Western Distributor erodes the vision of car-free mobility by investing public funds in a project that prioritise car use. This is fundamentally unsustainable and inappropriate in the 21st century.

- **Stakeholder and community consultation has been inadequate**

City of Sydney has been blind-sided by the exhibition of proposals for the Western Distributor. The City was not consulted about any aspect of the project while TfNSW was busy writing a 300-page REF, despite years of close collaboration on seven related strategies, including the transport plan (PUTP) to support and implement the Pymont Peninsula Place Strategy. This is unacceptable and will set back productive relationships between key stakeholders.

By seeking 'to minimise consultation fatigue' (REF page 67), the project appears to have gone to significant lengths to minimise feedback and limit community input. Insufficient time has been provided to respond. The consultation period spans a school holiday when many are away from their jobs and computers. The official online submission form does not allow a document to be attached, offering a single paragraph box for comments. This does not engender public trust or allay community concerns that the process is being railroaded.

Concluding thoughts

As stated in our introduction, **Bicycle NSW has one main recommendation: Cancel this and other projects which increase the capacity of roads funnelling traffic into the CBD.**

The proposals for the Western Distributor will not improve the safety, amenity or sustainability of Sydney's future transport network and impose substantial place impacts on Pyrmont, Ultimo and Darling Harbour.

We endorse City of Sydney's requests for more information about the traffic modelling, the business case and road safety data. We agree that it is essential to align any future proposals for the Western Distributor with the Pyrmont Ultimo Transport Plan and pause any motorway projects in central Sydney until the Metro and road projects under construction are complete.

The voters of NSW expect transparent and robust planning processes to guide land use changes and transport investment. Proposing a project that contradicts the visions endorsed by the community, and elucidated in documents such as the Pyrmont Peninsula Place Strategy, undermines public trust in Government to make good decisions.

Previous proposals to direct more traffic from the Anzac Bridge into Pyrmont have been rejected due to lack of strategic merit and unreasonable impacts. Once again, we are faced with a project that takes completely the wrong approach to solving a stated problem (ie traffic will increase as population grows and cause congestion) and aims to make driving easier. The focus must be on reducing motorway access and through traffic, and making walking, cycling and public transport the most attractive and easiest modal choice.

We look forward to hearing how the project team will address the serious concerns outlined in this submission.

Yours sincerely,



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- ⁱⁱⁱ City of Sydney. 2022, October 25. Submission to Western Distributor Network Improvements proposal. <https://www.cityofsydney.nsw.gov.au/-/media/corporate/files/projects/nsw-government-projects/city-of-sydney-submission-to-western-distributor-network-improvements-proposal.docx?download=true>
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- ^v Mann, A. 2014, Jun 17. Wired. What's Up With That: Building Bigger Roads Actually Makes Traffic Worse <https://www.wired.com/2014/06/wuw-traffic-induced-demand/>
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