

Warringah Freeway Upgrade  
Transport for NSW  
Locked Bag 928,  
North Sydney NSW 2059

10<sup>th</sup> July 2023

Submitted via email [whtbl@transport.nsw.gov.au](mailto:whtbl@transport.nsw.gov.au)

Dear Transport for NSW,

**Re: Cycling and Walking in North Sydney and beyond**

Thank you for the opportunity to comment on the Active Transport Network Review (ATNR) for North Sydney and surrounds.

Bicycle NSW has been the peak bicycle advocacy group in NSW for forty-seven years, and has more than 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 [Active Transport Network Review](#) was prepared to meet Condition E195 of the approval for the Warringah Freeway Upgrade (WFU). It contains a detailed review of existing and potential active transport networks within 500m of the Warringah Freeway Upgrade footprint. The ATNR has recently been submitted to the Department of Planning and Environment.

**Bicycle NSW strongly supports the six priority links outlined in the ATNR, as shown in Figure 1.**



Figure 1:  
The walking and cycling priorities set out in the Active Transport Network Review (Source: TfNSW)

The ATNR is a dense and thorough document. Although too detailed for most community stakeholders, we appreciate the clear discussion of strategic context. The new [Future Transport Strategy](#) has a key ambition to reduce car reliance and prioritise active, public and multi-modal transport options. This was followed in December 2022 by the [Active Transport Strategy](#) which aims to double walking and cycling trips and deliver 100km of new cycleways by 2028. Transport for NSW's 2021 [Road User Space Allocation Policy](#) supports the reallocation of road space to ensure the efficient movement of people rather than vehicles, bringing environmental and health benefits. The [Eastern Harbour City Strategic Cycleway Corridors](#) program was released in 2022. The identification of the North Sydney Connections as an 'immediate opportunity' clearly provides new impetus to propose continuous bike infrastructure on the Lower North Shore.

A raft of other State and Local Government plans and policies are summarised, such as North Sydney Integrated Cycling Strategy, St Leonards and Crows Nest 2036 Plan and the Greater Sydney Green Grid. There is a comprehensive list of current and future infrastructure and development projects and their impacts on the area, as well as a look at active transport data and demand.

North Sydney is a very complex area with many moving parts. We recognise that is very difficult to plan for the future and ensure that each project optimal outcomes for active transport when the parameters are constantly shifting.

This submission provides feedback on each of the 6 priority opportunities, and highlights other links that need to be considered. We focus on the opportunities for bike riding within and through the study area. Although walking is at the top of the transport hierarchy, there is not space here to discuss specific infrastructure for walking. However, best-practice bike facilities will improve pedestrian amenity too, either by creating wide, smooth shared paths with safe, accessible, pedestrian/cycling-priority crossings, or – even better – separating pedestrians from bike riders with dedicated paths for both modes.

Bicycle NSW thanks the WFU project team and Transport for NSW's Active Transport team for listening closely to our priorities and concerns, spending time with us on site and hosting 4 workshops attended by a large group of stakeholders. **The six priorities closely reflect our key asks for the area.**

## Better walking and cycling connections are desperately needed in North Sydney

The Gore Hill cycleway, delivered by the Lane Cove Tunnel project in 2007, offered a tantalising vision of separated infrastructure that could one day be extended to the Harbour Bridge. In 2023, the possible routes south of Naremburn to the Harbour Bridge remain dangerous and involve the congested streets of North Sydney's CBD or a very hilly and convoluted trip through residential streets. All but the most confident bike riders are deterred from active transport.

The [Providing for Walking and Cycling in Transport Projects Policy](#), released in February 2021, States that "every transport project funded by Transport for NSW must include provision for walking and cycling within the core scope of the project". Walking and cycling components of a project must be incorporated from the outset and followed through to delivery and maintenance. Although the Warringah Freeway Upgrade was designed and approved prior to the implementation of this policy, delivering safe, continuous and integrated active transport paths as part of all transport projects was a key tenet of the 2013 [Sydney's Cycling Future](#).

It is therefore **a failure of planning and policy** that the Warringah Freeway Upgrade project does not include the game-changing upgrades to the active transport network that residents and commuters have advocated for over three decades.

Instead, widening this major transport corridor to accommodate yet more car traffic has removed [existing active transport infrastructure](#) such as the Falcon Street underpass, the direct ramp to the Ridge Street

bridge and access to the motorway shoulder along Cammeray Golf Course. Pedestrians and cyclists continue to be inconvenienced by very circuitous detours. We have lost precious [urban tree canopy](#) to widen road space with an enormous impact upon amenity.

Three new active transport bridges at Ridge Street, Falcon Street and Ernest Street and a new shared path on the High Street Bridge will replace removed assets and widen existing east-west links for walking and cycling. However, these new scraps of infrastructure are isolated and disconnected. **They fail to materially improve the experience of navigating through the corridor on bike or foot.**

The replacement active transport infrastructure is documented in the Place, Design and Landscape Plan (PDLP), primarily in [Chapter 5: Active Transport Bridges](#).

We will not make further comments on the detailed design of these elements here. Please refer to our July 2023 [submission](#) on the Place, Design and Landscape Plan.

## The six walking and cycling priorities

**Opportunity 1: Gore Hill Freeway** aims to fix a highly dangerous gap in the network. The Gore Hill cycleway will be extended south from Naremburn with a widened shared path protected by a barrier. A grade-separated crossing of the Brook Street on-ramp is required, ideally landing on Jenkins St to provide level access to the West St cycleway being delivered by North Sydney Council. There are benefits beyond the extension of the regional cycleway. This bridge would provide an excellent walking connection between the local villages and schools of Naremburn and Cammeray, currently linked only via steep paths through Flat Rock Gully.

Note that a signalised crossing of the on-ramp may be acceptable. This solution may be more feasible in future as the Brook St on-ramp will become less significant, allowing access only to the Cahill Expressway and the Western Harbour Tunnel. Merging will no longer be necessary so vehicles will not need to gain speed on approach to the mainline to cut across lanes.

**Opportunity 2: Falcon Street Interchange** ideally requires an extension of the new Falcon Street shared user bridge over Falcon Street and the motorway off-ramp to St Leonards Park. This is a difficult junction to navigate by bicycle and it is a huge lost opportunity not to improve the access as part of the huge NSW Government investment in replacing the bridge.

We have questioned why a 7m clearance over Falcon Street is specified – other active transport bridges such as the new bridges over Warringah Road in Frenches Forest and over Anzac Parade at Moore Park have a 5-5.5m clearance. We requested spot heights in the park to help assess the ramps required to reach the landing point but this information has not been supplied.

If a grade-separated crossing is deemed impossible, it is essential to completely upgrade the at-grade crossing. Reallocate a vehicle lane and create wider footpaths, enlarge the median, move poles out of the way, remove the fencing and ensure 'beg' buttons are in a convenient location. There are 6 vehicle lanes heading east - surely one could be sacrificed to facilitate safer walking and cycling.

Although not discussed in the PDLP or ATNR, an image on construction hoardings (Figure 2) shows some improvement made at this intersection by removing vegetation and realigning kerbs on the refuge island west of the heritage brick chimney. This is much better. However, the image also shows NO footpath on the south side of the Falcon St freeway bridge. The footpath has just been closed for 18 months and pedestrian detours extend a 230m trip from Merlin St (south) to the north-east corner of St Leonards Park to 750m (Figure 3). A permanent loss of the direct connection is not acceptable, especially as the underpass on the

east side of the freeway that once provided access to the Falcon Street shared user bridge has been demolished and will not be replaced. It is essential to clarify the plans for the Falcon Street freeway bridge.



Figure 2: An image from the construction hoardings around the Cammeray compound does not feature any other documents but indicates a permanent loss of pedestrian access on the south side of the Falcon Street freeway bridge. This is a major concern, as crossing to the north side of the intersection on the eastern side of the bridge involves a 500m detour (Source: TfNSW)



Figure 3: Without a shared path on the southern side of the freeway bridge, or an underpass or new signalised surface crossings on the eastern side, pedestrians must back track to Watsons Street to cross from Merlin St to St Leonards park, adding 500m to the walk. This is the current situation as indicated on the detour map but it is not acceptable in the long term. (Source: TfNSW)

Note that under Condition E200, a safe and convenient route across Falcon Street must be created. **This will not be achieved under current plans.**

Transport for NSW must consider a new east-west connection to the south of Falcon Street and a direct north-south crossing on the east side of the freeway. Both routes have been severely compromised by the removal of the underpass, the possible loss of the southern footpath and the non-compliant ramp proposed for the Ridge St active transport bridge which will limit access to all but the fittest of riders. We urge the project team to consider all possibilities for connecting each corner of the interchange, including more out-of-the-box ideas such as a grade-separated active transport ring (Figure 4).



Figure 4: The Hovenring provides safe, seamless and transformational active transport connections across a major road junction in Eindhoven, the Netherlands. It is a landmark structure that touches the ground lightly and celebrates walking and cycling (Source: <https://hovenring.com/>)



**Opportunity 3: McLaren Street** will provide upgraded public realm and safe walking and cycling access to Victoria Cross Metro Station, which is forecast to attract 15,000 passenger movements at peak hour by 2036. Widened footpaths and landscaping have been flagged to improve place and walkability. The proposed treatments need to be in place before the Metro opens. The works should be part of the Conditions of Consent for the Metro project.

**Opportunity 4: North Sydney CBD East** is a visionary project that could unlock safe access to the Harbour Bridge for people approaching from the north and east, although it needs to include additional linkages to the east. This route interfaces very closely with the WHT and WFU projects and must be designed to integrate with the current construction works before it is too late. The route should include a new cycleway around the eastern edge of the St Leonards Park to take bike riders away from the paths through the centre of the park which are busy with dogs and pedestrians. This may involve a slight realignment of the oval.

Note that we have learnt of Western Harbour Tunnel (WHT) plans to remove parking, kerb extensions and trees on Berry Street to create 4 clear vehicle lanes (Figure 5). This does not align with other proposals to reduce the current function of Berry St as a key access route to the freeway. A section of separated cycleway on Berry Street is required to deliver North Sydney CBD East route!

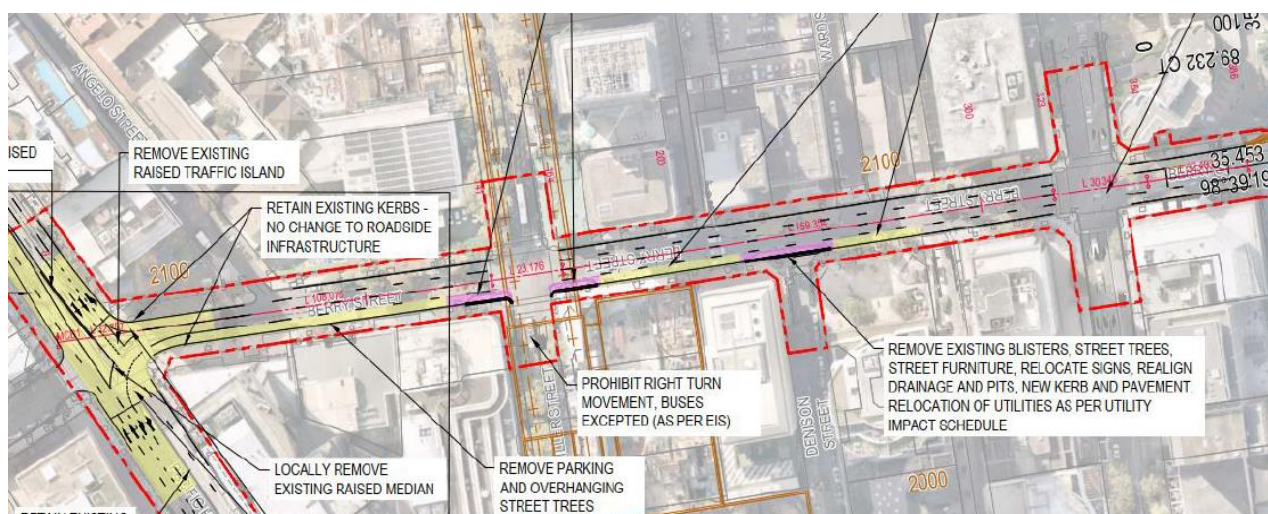


Figure 5: Alterations proposed to Berry St by the WHT project will prevent the improvements to walking, cycling and landscaping that are key to the successful operation of the Metro and other projects (Source: Acciona)

The separation of the WFU and WHT projects has created confusion about the final configuration of active transport infrastructure. Two very complex project in a constrained environment with two separated project teams will open up cracks for errors and confusion – in the documents if not on site.

Clarity is needed for all stakeholders on the impacts the final outcomes after both projects are complete. Is it currently very unclear what additional impacts the WHT project will have on walking and cycling routes, and if any additional infrastructure will be delivered for active transport.

**Opportunities 5. North Sydney CBD West and 6. Lavender Street to Blue Street are the highest priority** as they are the greatest barrier to people riding towards the Harbour Bridge from most directions. A vehicle lane on Pacific Highway must be reallocated to create a separated cycleway from Arthur St to West St. We do not believe that this option should be rated 'red' for technical difficulty/constructability. There is a wide swathe of tarmac ready to use! Apparently, the need to maintain vehicle lane widths mean kerbs will have to move and trees will be lost. But 40 (or 30) km/h speed limits would allow narrower lanes and a myriad of other place making benefits for North Sydney.

This excellent diagram (Figure 6) under *Direction E2: Optimise existing infrastructure* in [Future Transport Strategy](#) shows how reconfiguring vehicle and parking lanes to prioritise more efficient vehicles gets more from existing assets. Bicycle and bus lanes will reduce the number of private vehicle trips and improve the liveability and vibrancy of our communities.

Pacific Highway offers a perfect opportunity, alongside Victoria Road, Parramatta Road and Oxford Street, to set a benchmark for reimagining Sydney's unloved arterial roads.

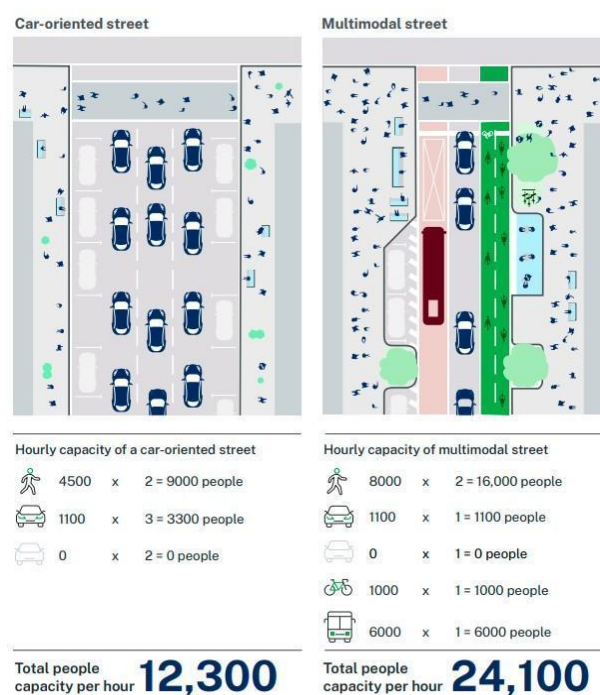


Figure 6: A key diagram from the new Future Transport Strategy that explicitly supports the reallocation of road space, comparing the total number of people moved per hour in the same amount of space on a car-oriented street and a multimodal street (Source: TfNSW)

As a minimum, the Pacific Highway in this location needs to be trimmed down by the time the Warringah Freeway Upgrade and Western Harbour Tunnel are complete, otherwise the traffic will simply increase to fill any spare capacity.

There is no workable alternative to a bicycle path on the Pacific Highway in the section south of Blue Street. Growing numbers of cyclists heading to the future Sydney Harbour Bridge ramp cannot be expected to negotiate the mature trees and high levels of pedestrian activity on the existing narrow shared path. The trees must be preserved and no one should be reduced to having to ride on the highway.

It is also essential to deliver the cycleway before Miller Street is converted to a pedestrian-priority plaza by North Sydney Council. Although bike riders will be able to use the plaza to access destinations in the vicinity of the plaza, riders traversing North Sydney from the Harbour Bridge urgently need a dedicated cycleway on Pacific Highway to connect with the West Street facility that is under construction.



## Other essential links to include in the ATNR

- The 6 priorities ignore the east-west strategic cycleway corridor that has been identified between Neutral Bay and St Leonards. Extend the separated cycleway on Ernest Street west beyond West Street and use local streets to reach St Leonards. There are several possible alignments for this route but Atchison St, Oxley St and Henry Lane provide a relatively flat option.
- There should also be a plan to extend the North Sydney CBD West route along Pacific Highway to St Leonards in the short term to complete the North Sydney-St Leonards strategic cycleway corridor. The population in Crows Nest and St Leonards is expected to grow sharply as Metro-aligned development gets underway and it is essential to connect these communities to the regional cycle network.
- A number of north-south links are essential to join up the priority routes. As discussed in our submission to the PDLP, safe at-grade or grade-separated crossings are needed to cross Ernest Street west of the freeway and Falcon Street east of the freeway.
- Note that there is another worrying example of conflicting documentation about a cycleway running along the eastern edge of the motorway corridor from Ernest St to Miller Street. The WHT documents include a plan of the Cammeray precinct with a cycleway running behind the motorway facilities and then along the edge of the freeway (Figure 7). The Active Transport Network Review map shows this route as a 'project in development'. Until the end of June, the map on the online WFU portal included the statement *'We are building a dedicated cycleway between Miller and Falcon Streets at Cammeray to improve safety and journey times for cyclists'*. This promise is no longer visible and there is no other no other indication that a cycleway will emerge from the rubble in this location. It is not mentioned at all in the PDLP.

This cycleway would provide important connectivity and replace the well-used shoulder lane removed to create the construction zone at Cammeray. It is vital for all stakeholders to clarify what is planned.

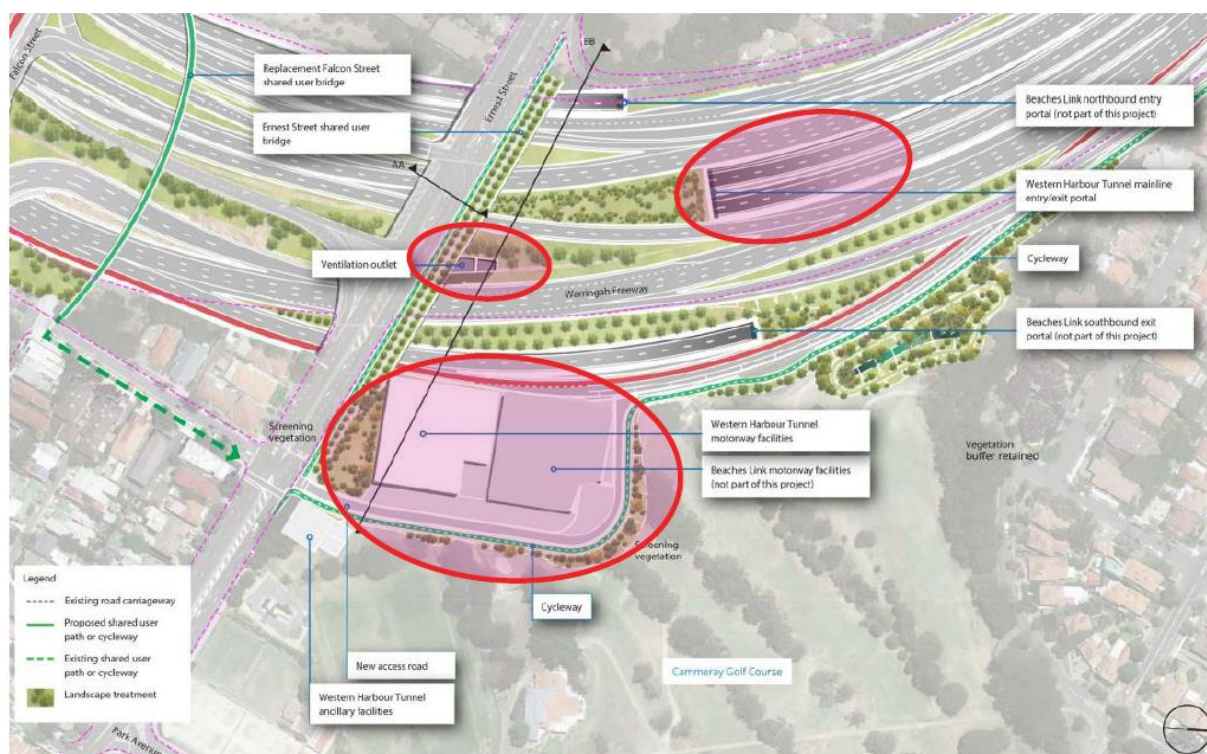


Figure 7: Plan of the Cammeray area once the WHT is complete. Is this an accurate representation of what is proposed? (Source: Acciona)

## Conclusion

Bicycle NSW thanks Transport for NSW for explicitly highlighting the 6 priority opportunities in and around the Warringah Freeway footprint. It is a huge step forward to put these on a map, alongside the strategic cycleway corridors and the active transport infrastructure current being planned or delivered by local and state government.

**However, we ask that these projects are designed, planned and delivered as part of the current works. They must not be sidelined as an aspiration for some time in the never never.**

It is a disgrace that the scope of works for the Warringah Freeway Upgrade did not include high-quality, continuous and safe strategic cycleways within or close to the freeway corridor to connect the Sydney Harbour Bridge with Naremburn, St Leonards and Neutral Bay. The current processes miss vital opportunities to improve cycling connectivity as part of the huge NSW Government investment.

But it is not too late to salvage real improvements to local and regional connectivity from the WFU and WHT projects.

The contractors are working to Conditions of Consent that were formulated in 2018. Over the last 5 years, the political and strategic context has shifted significantly in favour of active transport. TfNSW has a mandate to review the Conditions of Consent, pause construction work if necessary and develop detailed designs that maximise the future outcomes for walking and cycling. It is no longer reasonable to claim there is 'not enough space' for high-quality active transport infrastructure in an immensely wide motorway corridor.

Once the contractors have finished building the Warringah Freeway Upgrade and Western Harbour Tunnel, it will be decades before the freeway can be disturbed again. The time to act is now.

Yours faithfully,



Sarah Bickford

Active Transport Planner  
Bicycle NSW



Peter McLean

Chief Executive Officer  
Bicycle NSW