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Transport for NSW  
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Dear Transport for NSW,

**Re: Pymont-Ultimo Transport Plan**

Thank you for the opportunity to comment on the draft transport plan for Pymont and Ultimo.

Bicycle NSW has been the peak bicycle advocacy group in NSW for forty-eight 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. 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.

**Bicycle NSW supports the general intent of the draft Pymont-Ultimo Transport Plan (PUTP) and the many initiatives which aim to prioritise walking and cycling as the preferred mode for trips to, from and within the precinct.**

For example, the PUTP (Figure 1) stresses the importance of pedestrian connections to public transport and a high-quality pedestrian realm around the future Pymont Metro station. There are encouraging actions to reallocate road space to improve the safety and attractiveness of active transport. Most elements of the City of Sydney cycleway network (Figure 2) are included in the Plan, including the extension of the Goods Line to Central, a permanent separated cycleway on Bridge Road and the completion of the Darling Drive cycleway.

We are delighted that Connecting with Country sits at the heart of the PUTP. Local Elders and Knowledge Holders co-developed a framework that should help ensure that pathways and gathering spaces reflect local culture and provide continuing and inclusive access to water and green spaces.

But you can't connect with country by driving on it. You need to walk, cycle or be on country. You need to breathe fresh air and you need to hear the birds sing.

**And this sits at the heart of the problem with transport planning for Pymont and Ultimo. All attempts to improve place and make active and public transport safer and more attractive are countered by continuing NSW Government efforts to provide *more* space for vehicle traffic in Pymont to meet the predicted demand of an entrenched motorway traffic model.**



Figure 1: The Pymont-Ultimo Transport Plan initiatives summarised on one page (Source: Transport for NSW)

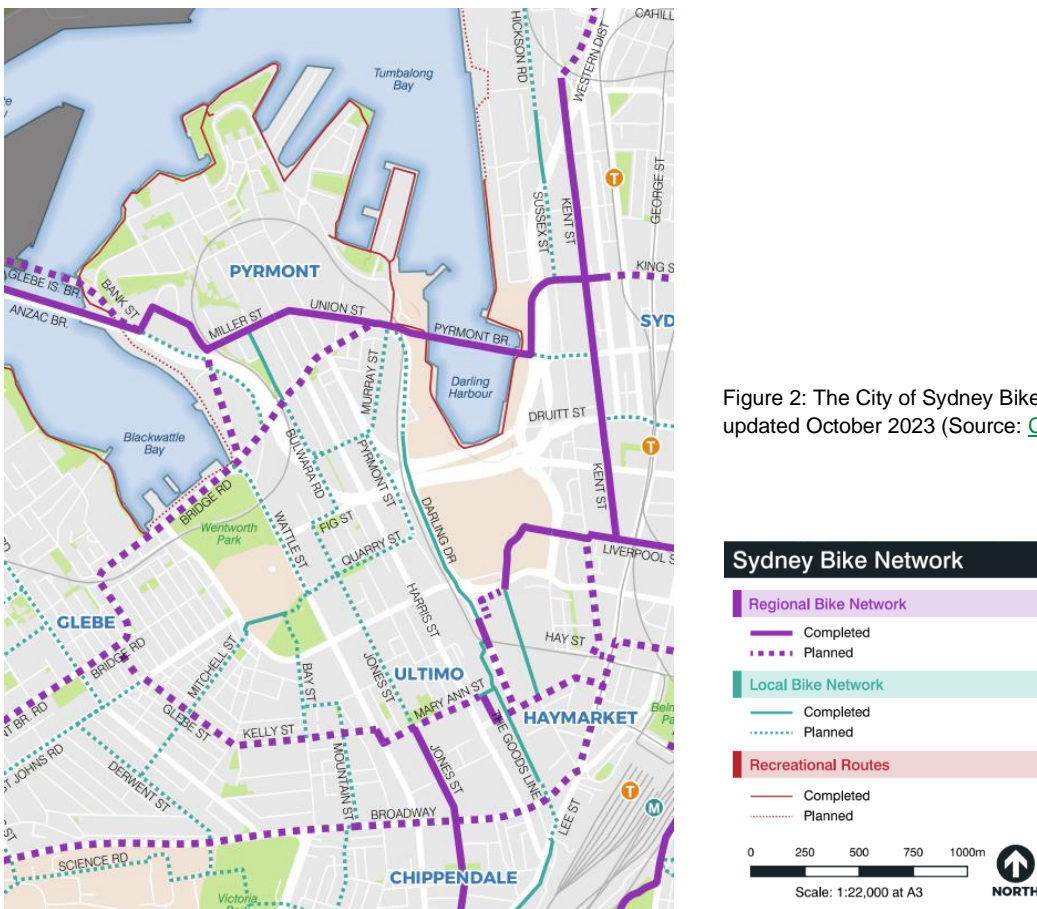


Figure 2: The City of Sydney Bike Network plan, updated October 2023 (Source: City of Sydney)

## Some key concerns:

### Concern 1: Undoing decades of improvement to liveability by increasing traffic capacity

Pymont and Ultimo have been subject to intense, multi-agency planning processes over several years. The 2020 Pymont Peninsula Place Strategy (PPPS) and the Pymont Peninsula Place-Based Transport Strategy, developed by Department of Planning in close collaboration with the City of Sydney, were great examples of planning for a better Sydney. The spotlight was strictly on place outcomes

But Transport for NSW relaunched the transport planning for the peninsula with an unspoken but obvious focus on the level of service for the tangle of motorways. The PUTP supports the expansion of the road network capacity to absorb the impact of induced demand caused by Westconnex and move more vehicles through Pymont.

The good work undertaken by the NSW Government and City of Sydney has been undermined and disregarded.

### Concern 2: PTUP doesn't consider the harm caused by the motorway or the most obvious remedy

The draft PUTP recognises the detrimental impact of high traffic volumes and the challenge of "large infrastructure corridors, such as motorways and light rail which cause severance and land sterilisation effects", to enabling economic activity.

So why does the PUTP not have a central ambition to unravel any of the mess created by the motorway network? Why is there minimal discussion of the Western Distributor, its expansion and its future role?

Although the Plan has an objective to *Balance movement and place on key corridors*, people are still clearly subservient to movement of cars. Spaces identified for better place outcomes are outside of the influence of the motorway projects.

For example, changes to improve amenity of Harris Street are only suggested for the section north of Allen Street. This is despite several directions in the PPPS that relate to reinforcing Harris Street as the peninsula's historic main street.

### Concern 3: PTUP and the Western Distributor 'improvements' are at cross purposes

The Western Distributor Road Network Improvements will hinder the aim of the PUTP to *Encourage travel by sustainable transport modes*. The changes to the motorway off-ramps increase the ability of local streets to act as pressure valves for a congested motorway system. Space for private vehicles will be prioritised and traffic volumes will increase in Pymont and Ultimo.

Bicycle NSW remains strongly opposed to this project.

As set out in our [submission](#) to the 2022 REF, 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 Pymont 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.

In line with this, access to and from the motorway must be reduced not expanded. Pyrmont has more motorway access ramps per square kilometre in Pyrmont than any other location in Australia. The PUTP moots the future removal of the Pyrmont Street on-ramp. We support this and ask all stakeholders to also plan for the removal of the Allen Street off-ramp.

#### **Concern 4: Some good intentions but zero funding or timeframe to get there**

The PUTP has no tangible commitment to the implementation of the majority of initiatives. There is not a clear timeframe for the delivery of place outcomes. The timeline for each initiative is too long. Which is not surprising when the PUTP sets out that: 'The draft Transport Plan considers a staged 10-year horizon, while remaining cognisant of the 20-year vision for the Precinct.'

19 short-term projects are planned for the next 5 years. But these are mostly unfunded and delivery will stretch into the Never Never. 16 medium- to long-term proposals are 'regarded as initiatives subject to further detailed investigation, scoping and business case development and investment decision'. This translates to ***not in scope***.

31 out of the 55 initiatives are marked 'for future investigation', including 7 out of 19 in the short-term category. That includes reducing speed limits and improving pedestrian priority at intersections. Why wait? We know what is needed, do it now. Metro will open by 2030. Upgrades for walking and cycling must be complete before then to ensure safe access and maximise mode shift.

Key projects are pushed into the distant future. The southern extension of the Goods Line to Central is slated for delivery in 10-20 years. And the Goods Line north extension and improvements to cross-corridor permeability will not even be investigated until the 10-20 years window. Is there any chance of delivery before 2100?

#### **Concern 5: Lukewarm approach to road safety**

The PUTP contains an initiative (S23) to reduce the speed limit to 40km/h in the majority of the precinct. However, any action to implement 30km/h speed limits on local roads with high pedestrian activity and place function, in line with the NSW Speed Zoning Standard Review, is added to the list of items 'for investigation'

This lukewarm approach is a barrier to reducing road trauma and improving streets for people, walking and riding bikes.

There is no good reason to delay. There is evidence from across the world that 30km/h speed limits save lives. As an example, the [British Medical Journal](#) found that the use of 20mph (32km/h) over a twenty-year period from 1986–2006 significantly improved road safety for users of all transport modes and ages. The rate of children under 15 being killed and seriously injured dropped by 50% in areas where the speed limit is reduced to 20mph (32km/h).

Bicycle NSW aligns with City of Sydney and urge a rapid roll out of 30km/h limits across the Pyrmont and Ultimo in line with global best practice and the [UN resolution of August 2020](#)

The PUTP must require that all changes to streets in Pyrmont and Ultimo are designed using a maximum 30km/h design speed. It should contain data on collisions and road trauma and set targets for driving this down to zero.

## Concern 6: Essential projects to support active and public transport and placemaking are ignored

There are currently so many barriers to movement across Pyrmont and Ultimo for those outside a car. Many barriers will be strengthened and expanded by the Western Distributor project. Long-planned and much-needed active and public transport initiatives are excluded from the PUTP.

For example:

- No real attempt is made to create clear walking and cycling routes across the tangle of motorway off-ramps. At a minimum there must be a direct, safe and attractive north-south route to connect Pyrmont Metro to Central and east-west routes from the Fish Market and Wentworth Park to Darling Harbour and Haymarket.
- A separated cycleway on Pyrmont Bridge Road is completely absent from the plans. This is key future route in the City of Sydney bike network because Pyrmont Bridge Road is the most efficient way into CBD for traffic from the west.
- There's no separated cycleway in front of the Fish Market. Just a shared path (S5) which is not appropriate for a major regional link. It would be wasteful and nonsensical to review the operation after the Fish Market opens (S12). Why not now?
- Public transport upgrades – such as new rapid bus routes, increased light rail frequency, new ferry stops – are all in the distant future. And whilst the can of public good is being kicked down the road, the private motorway project is progressing.
- The initiatives for Broadway do not mention [current City of Sydney plans](#) for a green boulevard. Vehicles lanes will be reallocated for wider footpaths, landscaping, a cycleway, and light rail.
- The PUTP fails to include a kerbside strategy to make better use of parking space and declutter footpaths.

Useful precedents: Lambeth Council in London has an ambitious [Kerbside Strategy](#) outlining four priorities that will be applied to every street in the borough to enable accessible and active travel, create social spaces, increase climate resilience, and reduce traffic and emissions. In 2020, WSP Australia published a report, [Future Ready Kerbside](#), with numerous inspiring ideas for reassessing our relationship with the kerb to prioritise people and sustainable transport. In Victoria, advocacy group Streets Alive Yarra suggests that inner city councils establish a [Mobility and Access Zone](#) within 150 metres of every household. Each zone would occupy the space of five car parking bays on residential streets, and include: a disabled car parking bay, a 15-minute loading bay, a car sharing bay, a covered hanger for bike parking and a corral for shared e-scooters and e-bikes.

### In conclusion:

Bicycle NSW hopes to see a much braver and bolder final PUTP. We fully align with City of Sydney's requests for a changed ethos to future transport planning in Pyrmont and Ultimo – and beyond.

Transurban, the company responsible for delivering the Western Distributor Improvements, boasted a congestion and inflated road toll [bonanza](#) for FYI 2021-2022. The project is a **public to private wealth transfer** resulting in a loss of amenity and safety. It is a movement-only initiative with no funding for place will drive more cars in and more wealth out of Pyrmont.

We urge Transport for NSW to press 'pause' on the Western Distributor project. We support [City of Sydney's advocacy](#) to **wait and see** how traffic responds to the new Rozelle interchange before inflicting long-term damage on neighbourhood streets in Pyrmont and Ultimo.

A similar approach was agreed for the Alexandra to Moore Park (A2MP) project, which proposed widening long stretches of inner-city roads to absorb increases in traffic from the WestConnex St Peters Interchange. It was soon clear that carnageddon failed to materialise. The project was cancelled, saving trees, parking spaces and urban amenity, liveability and walkability.

It is time to truly prioritise people and make strong and future-ready decisions about reducing vehicle use – not just within the precinct but through it.

**The PUTP must aim to stabilise and then reduce traffic in Pyrmont, and include a strategy to dismantle elements of the Western Distributor to reduce severance.**

It is very clear that a disconnect exists between branches of Transport for NSW dedicated to achieving place outcomes and enabling more active transport, and old-school traffic engineers operating at the highest level who are authorised to continue facilitating easier, faster car travel. Transport for NSW governance arrangements for Greater Sydney provide an effective power of veto to divisions with a short-term focus on traffic operations.

The PUTP should focus on elements of the transport system under NSW Government control, including: traffic volumes on the state road network, speed limits in the precinct, and major road and public transport network changes. Road space reallocation for walking and cycling projects should be easy for TfNSW to achieve, distanced from the political tensions faced by local councils. But projects are languishing.

Bicycle NSW will continue to ask the Transport and Roads ministers to deliver projects that contribute to the mode shift and net zero targets set out in the Future Transport and Active Transport strategies. It is essential to upend the status quo of prioritising access by car and initiate a true paradigm shift.

Yours faithfully,



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