

Transport for NSW,
Locked Bag 928,
NORTH SYDNEY NSW 2059

Via email: whtbl@transport.nsw.gov.au

28th August 2024

Dear Transport for NSW,

Re: Western Harbour Tunnel - Place, Design and Landscape Plan

Thank you for the opportunity to comment on Part 1 of the Place, Design and Landscape Plan (PDLP) for the Western Harbour Tunnel (WHT).

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. We advocate for new cycling routes 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.

This part of the WHT project offers little new infrastructure for people walking and cycling other than finishing the Ernest Street bridge that is being delivered by the Warringah Freeway Upgrade (WFU) project.

As a result, we will not submit lengthy feedback. Instead, we wish to reiterate some earlier comments made to Transport for NSW and the Transport Minister and ask these to be recorded in the submissions report for the WHT PDLP.

Active transport in the Warringah Freeway corridor

We have written extensively about the failure of the WFU project to improve the cycling infrastructure in and around North Sydney. This article, [Warringah Freeway Fails People and Environment](#) sets out our position and has links to detailed submissions for the [Active Travel Network Review](#) and the [WFU Place, Design and Landscape Plan](#).

Some elements of the former network are being replaced with shinier, wider versions - such as the bridges at Ridge Street, Falcon St and Ernest Street. But these new scraps of infrastructure are isolated and disconnected. They don't expand the active transport network or fill critical missing links. Some important connections have even been removed or downgraded - such as the ramp up to Ridge St bridge, and the Falcon St underpass.

The widened motorway corridor is now an even bigger barrier to movement that it ever was. **It is appalling that no material improvements to the walking and cycling network were planned** - despite the clear need to create a safe regional cycling route between Naremburn and the Sydney Harbour Bridge.

New cycling infrastructure along the corridor should be constructed in accordance with the established 'Providing for Walking and Cycling in Transport Projects Policy'. The argument that this policy was not in place when the contracts were signed does not hold weight given that statements about 'cycling infrastructure provision' have been included in NSW Government transport strategies at least as far back as

the Sydney's Cycling Future (2013). It was stated in this document that: 'The needs of people on bikes will be included throughout the planning of new and upgraded road, rail, bus and interchange projects, including corridor protection and the provision of infrastructure when projects are designed or constructed.' This is highlighted on Page 13 of the PDLP.

The failure to incorporate better walking and cycling outcomes can be placed on the shoulders of the previous NSW Government. **NSW Labor can now correct past mistakes.**

As you know, the development, approval and implementation of an Active Transport Network Review (ATNR) is a condition of consent of both projects. Both Bicycle NSW and Bike North contributed to the draft ATNR in 2023. It contains recommendations for 6 priority projects that we **strongly supported** (Figure 1). Frustratingly, this document still remains in draft form and has not been released to be actioned after more than a year. Some short-term proposals have been developed but these are unfunded and inadequate to make a dent in the problem. No long-term proposals have been considered at all.



Figure 1: The 6 priorities. Please refer to [Bicycle NSW's submission on the ATNR](#) for detailed comments. (Source: TfNSW)

We urge Transport for NSW to include priorities from the ATNR in the scope of the Western Harbour Tunnel project. Some of these projects interface very closely with the WHT footprint. 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.**

In particular, it is essential that a separated bicycle path along the Pacific Highway is planned, designed, funded and constructed as soon as possible. This path is the top priority identified by the ATNR. This gap in the network will be an even bigger problem when the Sydney Harbour Bridge Cycleway northern access ramp and the West Street cycleway are complete.

The Ernest Street active transport bridge

The WHT PDLP adds little new information about the Ernest St bridge. However, the separation of the WFU and WHT projects has created confusion about the final configuration of this important active transport infrastructure. Two very complex projects in a constrained environment with two separate project teams allow cracks to open for errors and confusion – both in the documentation and on site.

- The significant change in level between the new paths and the existing footpath on Ernest Street is a **major challenge**.

Apparently, the bridge paths are actually up to 3m above the road level. In both the WFU PDLP and WHT PDLP documents, the difference in level is shown to be approximately one metre in the sketchy cross sections (Figure 2). This level of inaccuracy fuels our concern about the potential for an almighty stuff up.

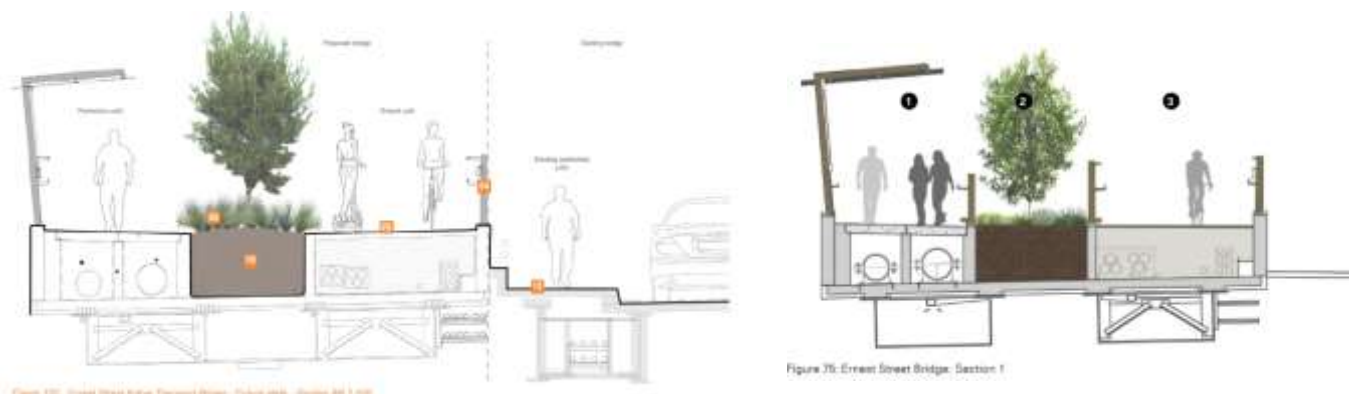


Figure 2: Cross sections of the Ernest Street active transport bridge from the PDLP for the WFU (Left) and the WHT (right) (Source: TfNSW)

Neither document is honest about the real level change – which is worst at the western end where the bridge needs to connect with Anzac Park, Cammeray Avenue and Jefferson Jackson Reserve.

Bicycle NSW and Bike North met with the WFU team in June to discuss this western end. We made [several recommendations and requests for further information](#).

It is hoped that the two teams are collaborating to resolve the connection of the bridge with Anzac Park.

- It is not clear if separate paths will be provided for bicycles and pedestrians. And if not, why not? It is best practice to separate users wherever possible.
- A safe crossing near the Jeaffreson Jackson Reserve that aligns with walking desire lines is required.

The connection from Jeaffreson Jackson Reserve to Anzac Park and Anzac Park PS has been neglected from the start of the WFU project. Pre-construction, there was a totally inadequate refuge and there appear to be no plans to upgrade this. It is clear that the safety of children has not been prioritised.

We highlighted this issue in [our submission to the PDLP](#).

The challenge of accommodating a crossing alongside the ramp leading down from the bridge into Anzac Park must be addressed by both teams urgently.

- A safe and accessible bicycle route linking Ernest Street to West Street should be delivered within the scope of the WHT project.

The new shared path along Ernest Street terminates at Anzac Park PS. This provides access for school students, staff and visitors from the eastern side of the school catchment. But it does nothing for those on the western side, which is a much larger catchment (Figure 3). To better cater to the west, a safe route from Anzac Park PS is required to connect to West Street, the main north-south regional route, for which a separated bicycle path design has been approved by North Sydney Council.



Figure 3: Anzac Park PS catchment. Most students live west of the school and have no safe cycling infrastructure for the trip to school (Source: [SchoolFinder NSW](#))

The bicycle route could continue along Anzac Ave and Rosalind Street to West Street, with a new safe crossing of Miller Street. Or it could stick to Ernest St as a shared path - or ideally a separated bicycle path using reallocated road space as proposed for West Street. Both options are shown on the North Sydney Active Transport Map, Figure 28 in the introduction to the PDLP (Figure 4).



Figure 4: An extract from the North Sydney Active Transport Map, Figure 28 in the introduction to the WHT PDLP. Two good routes west of Anzac Park are shown as future cycleways. (Source: TfNSW)

Please include these routes in the WHT PDLP and provide financial and technical assistance to North Sydney Council for delivery.

- A final point about the Ernest Street bridge. The size and scale of the stacks butting up against the Ernest St bridge are a shock (Figure 5). There was nothing in the glossy images in the WFU PDLP to indicate these huge stacks. This seems disingenuous.



dedicated cycleway between Miller and Falcon Streets at Cammeray to improve safety and journey times for cyclists'. This promise is no longer visible.

A path is indicated in North Sydney Active Transport Map in the WHT PDLP (Figure 4 above) as a green line (separated cycle path). However, it is not mentioned elsewhere in the PDLP, and there is no other indication that a cycleway will emerge from the rubble in this location.

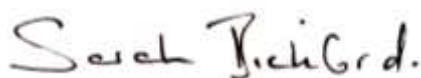
We look forward to genuine and early consultation on the designs for Cammeray Park.

In Conclusion

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.

Please do not hesitate to get in touch with Bicycle NSW if we can assist further at this stage.

Yours sincerely,



Sarah Bickford

Active Transport Planner
Bicycle NSW



Peter McLean

Chief Executive Officer
Bicycle NSW