25 October 2013

Sydney City Centre Access Strategy
Transport for NSW
GPO Box K659
Haymarket NSW 1240

Via email: access.strategy@transport.nsw.gov.au

Sydney City Centre Access Strategy Submission

Dear Sir/Madam

Thank you for the opportunity to provide comment on the draft Sydney City Centre Access Strategy (the Strategy). The Sydney Business Chamber (the Chamber) is a division of the NSW Business Chamber and represents Sydney’s leading organisations from the corporate, public and not-for-profit sectors. The Chamber advocates for Sydney to be a competitive and sustainable global city. The majority of Chamber members are based in the CBD and are all located within the Greater Sydney Basin.

The timing of the Strategy is significant as it is the essential first step to the reshaping of the Centre with the proposed introduction of light rail and the accompanying goal of creating a CBD known for its livability and with an image of the built environment as appealing as its natural setting. The Strategy provides a holistic and integrated blueprint for how Sydney’s CBD will enable access for competing modes of transport now and into the future. Importantly, the Strategy readies the CBD for light rail and the restriction of cars and buses on part of George St, which will provide enhanced access for commuters and visitors to key precincts in the CBD.

The Chamber acknowledges that the Strategy represents an attempt to provide an integrated transport solution to the competing demands of a busy CBD. Whilst the focus of the Strategy is necessarily on transport, the existing and future built environment should inform the Strategy to create a centre which is truly integrated and where the significant investment made by the private sector is considered as part of the Strategy, where appropriate. The Strategy needs to be a whole-of-government policy. All NSW government agencies need to sign up to the Strategy so that one does not have supremacy in any area, the Circular Quay/Rocks area is a case in point.

Not identified in the Strategy but important in managing transport in the centre is the extent to which streets are compromised by other activities. The decision in recent years to permit a street-market to operate on certain days at Jack Mundy Place in the Rocks, thus compromising access to the Overseas Passenger Terminal is a case in point. Responding to the Strategy requires all agencies to agree on the desired outcomes.

Recommendation: The Strategy needs to be a whole-of-government policy.
Prepare for Change within the city centre

Prioritisation of city centre street space

The Strategy identifies how each mode of transport will access the CBD in a way which maximises efficiency. By detailing preferred routes for car travel, completing the cycleway network, improving capacity and amenity for pedestrians and redesigning the bus network, the Strategy allocates and optimises limited city centre street space.

On-going and accurate communication will be a key to the success of the Strategy. The provision of real-time information about bus arrivals, congestion points and traffic or other incidents for CBD users via apps and digital signs across the Centre would encourage a sensible approach to travel by better informed drivers and passengers.

Linked to the provision of timely information is the importance of upgrading, harmonising and simplifying wayfinding signage around the city for the benefit of locals and visitors. One agency should have responsibility for signage and the starting point should be that they are provided to inform the public.

**Recommendation: One agency should have responsibility for signage and the starting point should be that they are provided to inform the public.**

Establish traffic bypass and priority routes to move traffic around and within the city centre

The encouragement of cars to utilise grade-separated roadways is sensible. The Cross-City tunnel (CCT) is a significant piece of Sydney infrastructure. It is clear though that the CCT is underutilised. It is now timely for the NSW Government to assess the costs and benefits of government action, such as pricing and improving access points, aimed to increase the patronage of the CCT.

During the construction phase of the light rail consideration should be given to reducing the toll to both encourage use of the CCT and as a compensation for surface disruption.

**Recommendation: During the construction phase of the light rail consideration should be given to reducing the toll to both encourage use of the CCT and as a compensation for surface disruption.**

More taxi ranks in better locations

The proposed strategy of the establishment of additional taxi ranks and the focus on designated drop-off and pick-up points for taxis, is supported provided it is accompanied by an on-going communications campaign.

Communications should make clear the benefits to both passengers and drivers. The NSW Government should investigate, in consultation with the taxi industry, how best to use GPS instruments or Apps to benefit both drivers and passengers about this new approach. The strategy will require a change in community behaviour.

Taxi ranks and set down/pick-up points will need to be clearly identified to ensure all users but in particular tourists and infrequent visitors to the CBD can understand the proposed system. The Chamber recommends marking with a yellow line painted on the
gutter any area where a taxi may stop. For part-time taxi ranks, this could be denoted with a painted broken yellow line on the gutter. This would help to de-clutter curb side signs and increase legibility for taxi users and drivers.

The NSW Government should also provide information on taxi rank locations to members of the hotel and restaurant industry so that staff can direct patrons to the location of the nearest taxi rank if one is not located adjacent to the hotel as is the case with the Travelodge on York Street for example.

The Strategy proposes an investigation of the use of mail-zones in the CBD as pick-up/set down points for taxis. Making use of underutilised spaces is a sensible proposal and is supported.

**Recommendation:** The Chamber recommends marking with a yellow line painted on the gutter any area where a taxi may stop. For part-time taxi ranks, this could be denoted with a painted broken yellow line on the gutter.

**Late Night Access**

The work undertaken by the City of Sydney to promote Sydney’s late night economy should inform the Strategy. Extending the hours of certain bus services, extending and modifying night-time secure taxi ranks and where feasible ensuring integration with key entertainment venue operating hours will ensure a more secure CBD.

A commitment to ongoing consultation by the proposed Dedicated City Centre Transport Taskforce with businesses that operate late at night must be part of the Strategy.

**Recommendation:** A commitment to ongoing consultation by the proposed Dedicated City Centre Transport Taskforce with businesses that operate late at night must be part of the Strategy.

**Efficient access for commercial and service vehicles**

The Strategy correctly recognises the importance of maintaining access for commercial vehicles, whilst minimising their impact on congestion. The Strategy proposes a range of options such as encouraging commercial vehicles to move to off-peak and off-street loading where possible, allowing ample space for on-street loading and encouraging the use of off-street break-freight facilities to consolidate freight. It is important that the NSW Government continues to work with industry and the City of Sydney to progress these initiatives.

**On-street and off-street parking reforms**

Given the impact on-street parking has on congestion, the proposal to identify on-street parking which can be removed, is supported.

The proposal to make better use of off-street parking for loading is a significant move and will require dialogue with building owners about access for adjoining businesses that may not be tenants. This may avoid the need for small business owners to be on the premises for out-of-hours deliveries or where a business has insufficient staff to undertake the task.
The Strategy does need to acknowledge that access to parking, off-street or otherwise, is an essential requirement of many businesses. The reference to reviewing the Parking Space Levy Act and reducing the rate of provision of parking spaces in areas of congestion, needs to be considered in the context that it may unfairly disadvantage such businesses. We recommend that the NSW Government undertakes further consultation with both parking operators and business before making any changes to the Parking Space Levy.

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**Complete Opal Card rollout**

The Opal Card is supported as it will promote a better customer experience for public transport users. However, the roll-out also provides an opportunity to better integrate the fare structure, not just the ticketing, to encourage greater take-up of public transport options. The proposal to allow free transfers between services of the same mode within an hour should be extended so that it also applies across modes within the hour. A passenger who is able to catch one or two buses into the city should be charged the same amount as someone who is travelling the same distance but is required to catch a bus and train or bus and ferry for example. This will make the prospect of mode-changing more acceptable.

**Recommendation:** The proposal to allow free transfers between services of the same mode within an hour should be extended so that it also applies across modes within the hour.

**Develop a midtown interchange precinct and other key hubs**

Developing interchange precincts will promote mode change which will encourage greater use of public transport into and within the CBD.

The Strategy should recognise that taxis are an important mode of transport for interchange; therefore taxis need to be incorporated into any interchange precinct.

**Recommendation:** Taxis need to be incorporated into any interchange precinct.

**An improved bus system in the city centre to reduce congestion**

Given that buses are a contributing factor to congestion a revision of the bus network through the CBD is long overdue. The proposed actions outlined in the draft Strategy are in general supported by the Chamber and we anticipate that these changes should improve bus operation through the Centre both before and after light rail has been installed in Sydney’s city centre.

The Chamber is aware of and supports proposed significant private sector investment in the Circular Quay and Young Street precincts. The Chamber believes that the investment will considerably enhance that part of the city as a major mixed use economy.
The Circular Quay precinct is a major commuter zone and a major precinct for visitors and as such the management of transport and the future light rail system to support the area as a major City gateway will require a careful balance of competing needs. The Chamber recommends extending the Pedestrian Priority Zone for the remainder of the Circular Quay block as it would give recognition to the impact of the new developments proposed in the precinct.

Clearly Circular Quay is a major transport hub but it is also a major centre of tourist activity, a site of significant heritage buildings and a strong commercial precinct. In the hierarchy of uses, managing buses and the use of the Young Street precinct as a bus layover seems to have an undue priority.

The Chamber urges a review of the Strategy to ensure that no additional buses be permitted to terminate at Circular Quay and ideally that the number of buses terminating at Circular Quay be reduced. In the same context reduce the quantum of buses using Young Street as a layover.

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**Improve safety, amenity and capacity for walking and cycling in the city centre**

Improving pedestrian access throughout the CBD will improve the experience of workers, residents, tourists, shoppers and other visitors to the CBD. It will enhance Sydney’s position as a global city and will take advantage of Sydney’s climate and natural and built aesthetics.

There is no denying that during the construction of the Wynyard Walk, light rail and Barangaroo the impact on the pedestrian experience needs to be considered. The Chamber acknowledges that Transport for NSW has embarked on an extensive consultation with major business operators close to George Street but it is evident that as the project proceeds a strong and wide consultation strategy will be required.

The implementation of the 40km/hour speed limit is supported as it will balance safety outcomes with the broader goals of City users.

The completion of the cycleway network will support promotion of Sydney as a sustainable city and will enhance the experiences of commuters who choose to cycle to work. The cycleway network will promote safety by increasing the capacity of separated cycleways which will also improve the experiences of drivers along these routes. The Barangaroo development provides an opportunity to extend the cycleway network from the CBD to the NW precinct of the CBD, thus providing future workers and visitors with access via bicycle.
New buildings planned for the CBD are incorporating significant storage for bicycles. Not all these buildings have immediate access to planned cycleways. The Strategy needs to acknowledge that in the future more bicycles will use streets that are not connected to the cycleway network.

**Recommendation:** The cycleway network should be extended from the CBD to the NW precinct of the CBD (Barangaroo), thus providing future workers and visitors with access via bicycle.

**Operational changes to increase capacity**

While recognising that Sydney will need increases in public transport infrastructure capacity in the future, it makes economic sense to first ensure that current infrastructure is being utilised to its full capacity. Implementing rail improvements, enhancing ferry patronage, extending clearways and redesigning the bus network are all sensible ways to achieve this outcome.

**Extend public transport access**

The Chamber has been supportive of light rail since its announcement. The CBD and South East light rail will remove 180 buses in peak times while providing a direct link to the precincts around Moore Park and Randwick. Importantly, the light rail system is being designed from a holistic approach so that it is not viewed as simply a mode of transport but also as a catalyst for urban renewal and increased amenity for both light rail users and pedestrians.

**A step change in future capacity for access to the city centre**

As discussed above, there will be a need to continue to increase the capacity of transport infrastructure to the city centre. Rail is undoubtedly the “heavy lifter” in providing access to the city and therefore requiring long term investment in rail, including building a second harbour crossing and new CBD rail line.

The Sydney Business Chamber appreciated the opportunity to make comment on this Strategy. Overall, the Strategy is a sensible, practical and thoughtful approach which sets out how each transport mode will access the CBD as well as outlining how these modes will interact.

If you wish to discuss any elements of this submission, please contact either myself on 9350 8101 or patricia.forsythe@thechamber.com.au or Larissa Cassidy on 9458 7359 or larissa.cassidy@nswbc.com.au.

Yours faithfully

THE HON PATRICIA FORSYTHE
Executive Director