Sarah Tasic
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Newtown NSW 2042

Monday 2 November 2015

Secretary
DP&E Project No. SSI 6307
NSW Dept of Planning & Environment
GPO Box 39
Sydney NSW 2001

Dear Sir/Madam,

RE: WestConnex Project

I make this submission in relation to the Environmental Impact Statement (EIS) for the WestConnex M4 East Tunnel project. I strongly object to this project and the entire WestConnex of which this is a part and request a response to the following concerns.

Inadequate Traffic & Transport Assessment

The approach employed to model levels of travel demand induced by the project is inadequate. The key failure lies in the decision to employ a Fixed Trip Matrix (FTM), which effectively imposes a limit on potential modelled increases in traffic and focuses on redistribution of trips, rather than a Variable Trip Matrix (VTM) which would allow modelled increases taking account of latent demand for travel.

The New Zealand Transport Agency Economic Evaluation Manual (EEM) referenced in the EIS includes methodologies for both approaches. The reason for relying solely on a FTM approach is not explained in the EIS and is not supported by good practice.

The transport modelling profession has long been aware that in congested urban environments like Sydney with significant latent demand for travel (as a result of congestion discouraging people from undertaking trips), upgrades to transport infrastructure can result in demand for travel becoming so great that congestion re-occurs and increases throughout the transport network. Research indicates that this isn't the case in all circumstances. Where there is limited latent demand for travel, congestion is less likely to be exacerbated by improvements. However, recognising current conditions on Parramatta Road, it is difficult to imagine an absence of significant latent demand. Given these conditions, it is argued that a VTM would provide a more realistic approach to modelling the potential for induced travel associated with the WestConnex project.

It is not unreasonable for there to be different views on the suitability of a FTM versus a VTM approach to modelling induced travel for this project. However good practice requires that both are employed to enable an analysis of the sensitivity of the traffic forecasts to a VTM to be examined. In the absence of this sensitivity testing it is not possible to have confidence in the findings of the transport modelling conducted.

As the transport modelling is the critical analysis underpinning virtually all of the benefits espoused for the project, if it cannot be trusted then the benefits espouse also cannot be trusted including the travel times savings, air quality improvements, noise reductions, improvements in amenity along Parramatta Road, reductions in greenhouse gas emissions etc.

The failure to properly consider induced travel demand on road upgrade projects is a common one internationally. Research indicates that there are relatively few models that properly account for this, however the implications are significant resulting in a systematic overestimation of benefits and an underestimation of negative impacts.

It is acknowledged that the project creates the ability for more traffic to flow through the network. What I argue here is that the costs of providing this increased capacity are underestimated in the EIS and the benefits exaggerated. This is a major issue.

Action: Revisit the traffic and transport assessment and conduct a sensitivity analysis of the induced travel demand using a Variable Trip Matrix to property examine the potential for reduced benefits from the project due to increased future trip numbers.

Inadequate consideration of alternatives

Insufficient consideration has been given to the role of public transport and rail freight in managing demand for current and future vehicle trips along this corridor and more broadly as a reasonable alternative to the WestConnex project.

The EIS highlights that WestConnex is referenced in the key strategic planning documents for NSW, including the *NSW Long Term Transport Master Plan*, *The State Infrastructure Strategy*, and *A Plan for Growing Sydney*. While this is true, it is not evident from any of these documents that reasonable alternatives to the project were considered.

The tendency within government for road, freight and passenger rail networks to be planned independently of each other means that necessary non-modal processes of problem identification, solution development, evaluation and project selection are not being carried out as they should. While the formation of Transport for NSW (TfNSW) represents a considerable improvement on past administrative structures, on-going segregation of planning activities within TfNSW means that a proper analysis of alternatives to WestConnex is yet to be undertaken.

The community of NSW deserves a more considered approach, particularly in light of the costs, both in terms of the State budget but also in terms of liveability arising from proceeding with another major road upgrade project.

Action: Conduct a more comprehensive analysis of alternatives to WestConnex, particularly examining the upgrades that would be required to Rail Freight and public transport services to achieve the improvements in conditions along Parramatta Road that the city as a whole aspires to.

Rapid Bus Transit - Parramatta Road vs The Tunnel

The EIS suggests that a significant driver for delivering WestConnex is to repurpose Parramatta Road and facilitate urban renewal in precincts adjoining the Parramatta Road corridor by improving local amenity with less traffic noise and less vehicle emissions from congested traffic. The EIS indicates that the proposed changes will facilitate more localised trips as well increased north south movements across Parramatta Road. All of these features point towards reduced speeds and creation of a more localised transport network. This seems contrary to the notion of accommodating a future Rapid Bus Transit service on Parramatta Road, particularly one that is intended to carry large numbers of commuters from Sydney's western suburbs into Sydney's inner suburbs and CBD.

If anything, a Rapid Bus Transit system serving Western Sydney should be directed to dedicated lanes in the proposed tunnel where travel speeds should facilitate rapid transit. Such an approach

would be consistent with Brisbane's very successful Rapid Bus Transit system which allows local buses to pick up passengers in surrounding suburbs and then transport them quickly to the city centre on dedicated routes without the need for interchange.

The current proposal for Rapid Bus Transit on Parramatta Road makes little sense in the context of a solution for commuters from Western Sydney. For those living in the new urban renewal areas along Parramatta Road, this is a different story, a surface bus service makes a lot of sense. However the two propositions are quite different and warrant different approaches. The subtlety of this distinction doesn't come across in the EIS and requires further consideration.

Action: Revisit proposals for Rapid Bus Transit services on Parramatta Road with a view to incorporating dedicated bus lanes in the tunnel to transport commuters from Western Sydney into Sydney's inner suburbs and the CBD. Incorporate proposals for the Rapid Bus Transit services on Parramatta Road in so far as these are intended to service those living in precincts alongside the road.

Sydney's new economic geography is increasingly nodal

Dispersed patterns of employment are a legacy of traditional manufacturing industries which are in decline in Sydney (and elsewhere) and in the process of being replaced by increasingly nodal employment land uses centred around locations with good public transport services, and often associated with Universities. Wise investment of public money is urgently required to help Sydney maintain its global competitiveness – this includes recognising that public transport will be at the centre of our future economic development and that wherever possible investment in public transport infrastructure should be given the highest priority.

Action: Revisit the land use assumptions which underpin the traffic and transport assessment for the project to ensure that these recognise the increasingly nodal pattern of development in Sydney. Further analysis of alternatives to the project should also be shaped by an awareness of Sydney's changing land use pattern.

Sustainability needs to be given a higher priority

The EIS highlights that 6% of energy for the project is slated to come from renewable sources. This low level of commitment to sustainability is surprising, particularly when compared with emerging proposals for significant commitments to sourcing renewable energy for the State's newest rail projects. In light of the poor standing the project has amongst community members concerned about greenhouse gas emissions and contributions to climate change, the commitment should be to source 100% of energy from renewable sources, or rather to buy renewable energy offsets to meet 100% of the project's operational energy demand.

Action: Commit to buying renewable energy offsets to meet 100% of the project's operational energy demand.

I trust that the issues I have raised in this submission will be given serious consideration and will be properly addressed through revisiting the fundamental drivers shaping this project.

If you have any questions or would like to discuss the points I have raised in more detail I would be more than happy to talk further. I can be contacted on 0405 52 517 or at milanandsarah@hotmail.com.

Yours sincerely,

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Sarah Tasic