Northconnex EIS Submission – Traffic and Transport - SSI 13_6136

Introduction

This submission is made against the background including –

- the Northconnex pre-EIS promotional activity
- the true nature of the Northconnex proposal
- the government pre-occupation with construction activity and new roads
- the conduct of government business through 'unsolicited proposals' and 'alliance' agreements.

The pre-EIS Northconnex promotional activity has centred on "***up to 5000 trucks per day off Pennant Hills Road"*** as the key to other promises such as the *"return local streets to local communities, providing opportunities for improved public transport, better and more reliable trips* and "*delivering improvements to local air quality"*.

Northconnex is simply a Pennant Hills Road bypass.

It will increase the volume of traffic through the area. It will deliver traffic faster between two motorways that are already stressed. It will have an eventual capacity that will be unsupportable in these two motorways. It is not the traffic congestion buster that wishful governments might think. It is a private toll road operator proposal with no pretence of being a part of any regional traffic management plan.

Government, more specifically **Roads and Marine Services** (the RMS), is now the Northconnex proponent with Transurban's 'unsolicited proposal' having been transformed into a 'State Significant Infrastructure'. This change would normally require a cost benefit analysis, but none is provided. Is this omission related to the projects 'unsolicited proposal' origins, which have also led to 'government by announcement' and will lead 'alliance' agreements and arrangements and an ill-informed public?

This submission seeks to understand the reasoning within the EIS that has led Government and the RMS to this point and covers the analysis of :

- Section 3. **Existing** Traffic and Transport Conditions
- Section 6. **Future** Conditions without the project
- Section 8. **Resulting** Operational Traffic Impact Assessment
- Roadway and Intersection Performance
- Associated Roads
- Local Streets
- Mitigation Measures and
- Truck Enforcement Legislation.

With RMS being the proponent we understand that the Department, the Minister and the Government accept responsibility for the EIS and they will be addressing all the matters raised in this submission.

Northconnex EIS Submission – Traffic and Transport

Section 3. Existing Traffic and Transport Environment

Table 3.7 refers to –
- 2013 AWDT traffic flow (Source Austraffic 2013)
  - Pennant Hills Road, north of M2 79050 Heavy Vehicle % 14.4 (= 11383 HV)
  - it is assumed that this is the source of the often quoted 80000 daily traffic flow
  - the exact count station, although important, is not identified

- why weren't the counts for the mid-points shown as throughout the EIS?

Table 3.8 refers to –
- 2013 Intersection traffic counts not mid-point counts (Source Austraffic 2013)
  - counts for 6 intersections between the M1 and M2
  - peak hour counts only
  - combined am/pm HV% ranged from 7.0 to 9.6 %
  - Table 3.7 peak hour HV% 12.3 % am – 10.3%

- what explains the extraordinary 14.4% heavy vehicle figure in Table 3.7?
- where does this level of detail come from when no mid-block daily traffic counts (incl. HV) have been shown? If this is the 'existing' or known section, where is data?
- what has happened to the former RTA regular AADT and AWDT processes?

Table 3.10 refers to –
- 2013 AWDT traffic volumes on the M2 (Source Austraffic 2013)
  - west of Pennant Hills Road 87150
  - east of Pennant Hills Road 76100
  - exited to Pennant Hills Road 11050
  - Pennant Hills Road south of M2 47650 - see Table 3.7
    59700
  - Pennant Hills Road north of M2 79050 – see Table 3.7

- what explains the variance? 19350

Table 3.11 refers to
- 2013 AWDT traffic volumes on the M1 (Source Austraffic 2013)
  - north of the Pacific Highway interchange – 72400
  - 2002 AADT as per SKM Link Study 71200

- what explains the 11 years increase of 1200 only?

Table 4.3 refers to
- 2013 ADT traffic volumes for 4 sections of Pennant Hills Road (Source AECOM)
  - Comenarra to Beecroft Rd 73100 vs 75600 SKM Link Study AADT 2002
  - Beecroft ro Castle Hill Rd 66700 vs 69000 SKM Link Study AADT 2002

- what explains these 11 year decreases in traffic volumes?
- why wasn't this mid-block traffic flow data included in Table 3.7?

Tables 4.9 refers to

- the 7 key mid-blocks not previously mentioned, with detailed 2013 data covering
    - light and heavy vehicles
    - northbound and south bound
    - at the peak hours – am & pm, and
    - level of service assessments
    - there is no mention as to the source
- **where does this information come from?**
- **where is the daily traffic counts for these mid-blocks?**

Table 4.10 refers to

- 2013 traffic numbers for 13 intersections, with detailed data covering
    - light and heavy vehicles
    - at peak hours – am & pm
    - level of service assessments
- **where does this information come from?**
- **why expand the intersections from Table 3.8?**

Conclusion – if this section purports to establish the existing (known) base on which to base future traffic modelling it is far from convincing. Without a convincing, consistent and visible base point the proposal should be refused.

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Section 6. Future Conditions without the Project

This section suggests that a meaningful base has been established, but

Table 6.1 refers to
- 11 intersections instead of starting with the key mid-block daily traffic numbers
    - it predicts 2019 and 2029 heavy vehicles numbers without showing the 2013 base
    - the 2013 heavy vehicle numbers include 2 variances with Table 3.8
    - the growth rates used are not reported or explained
- **if a meaningful base is claimed, why isn't it displayed in full detail?**

Table 6.2 refers to
- the 7 key mid-blocks
    - it predicts 2019 and 2029 total daily traffic counts
    - with northbound and southbound detail
    - it fails to show the 2013 base numbers – total and heavy vehicle
    - the Comenarra Parkway to Pacific Highway mid-block numbers differ significant from Figure 8.1 – see Section 8. Operational Traffic Impact Assessment following.

- what explains the above Figure 8.1 variance?
- if a meaningful base is claimed, where are the 2013 numbers?

Table 6.3 and 6.4 refer to
- the 7 key mid-blocks level of service assessments
    - it predicts 2019 and 2029 peak hour traffic numbers, northbound and southbound
    - presumably based on Table 4.9 previously questioned
    - the growth rates used are not reported or explained

- what is the value of these assessments if the base is well established?

Table 6.5 refers to
- the 13 intersections level of service assessments
    - it predicts 2019 and 2029 peak hour traffic numbers
    - presumably based on Table 4.10
    - the growth rates used are not reported or explained

- again, what is the value of these assessments if the base is not well established?

Tables 6.18 and 6.19 refers to
- 21 surrounding roads
    - with 2013 (existing/known) counts (Source Strategic Transport Model 2014)
    - predicting 2019 and 2029 two-way traffic numbers
    - for total and heavy traffic
- **why has this level of detail not shown for the key mid-blocks?**

Conclusion – this section not only works off a base position that has not been convincingly established, but includes inconsistencies and adopts growth rates that are not reported or explained. Again, w**ithout a convincing, consistent and visible base point the proposal should be refused.**

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Section 8. Operational Traffic Impact Assessment

This sections assumes that the 2019 and 2029 traffic predictions are reasonable, irrespective of all the question posed above.

Tables 8.1 and 8.2 refers to
- 11 intersections 'with' and 'without' traffic predictions (Source Strategic Transport Model 2014)
  - for 2019 and 2029 in peak hours – am & pm
  - for light and heavy vehicles.

  and therefore the reductions as a result of the tunnel

Table 8.3 refers to
- the 'in-tunnel' traffic flows for 2019 and 2029 (Source Strategic Transport Model 2014)
  - for light and heavy vehicles
  - in peak hours – am & pm

- how, exactly, does this Table relate to Tables 8.1 and 8.2?
- how and where are these numbers converted to daily tunnel traffic predictions?

Table 8.4 refers to
- the 7 key mid-blocks 'with' and 'without' traffic predictions (Strategic Transport Model)
  - total vehicles per day
  - northbound and southbound detail
  - the Comenarra Parkway to Pacific Highway mid-block numbers differ significant from Figure 8.1 – see Section 8. Operational Traffic Impact Assessment following.

- what explains the above Figure 8.1 variance?

Table 8.5 refers to
- the 'in-tunnel' AWDT volumes for 2019 and 2029 (Source Strategic Transport Model 2014)
  - for total vehicles per day only

- how, exactly, does this table relate to table Table 8.4?
- why does this table not include light and heavy vehicle predictions, as Table 8.3 does?

Figure 8.1 is referenced twice above and deserves special attention
- see following pages.

Tables 8.6, 8.7 and 8.9
- perpetuate the issues raised with Tables 6.3, 6.4 and 6.5 above

Table 8.31and 8.32 refers to
- the effect of the tunnel on surrounding roads, such as Boundary Road, for example
  - a light vehicle eastbound reduction of 2400 in 2019
  - a heavy vehicle westbound increase of 300 in 2029

- what, exactly, explains these tunnel impacts on Boundary Road traffic?

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The table below has been extracted form **Figure 8.1 and Table 8.5** with the addition of-
- tunnel effect columns (T-Effect) for 2019 and 2029
- code letters to enable the questions following, and
- similarly Pearces Corner numbers.

EIS - AWDT - Figure 8.1 - Road Segments	2019 without	with		T-Effect		2029 without	with		T-Effect	
F3	92650	103150	A	10500		101700	116500		14800	
Pacific Hwy - North	40650	36400	B	-4250		44150	40300		-3850	
Pacific Hwy - South	68400	69500	C	1100		75100	76100		1000	
Pearces Cnr to Comenarra	81800	61900	D	-19900	E	78500	70500	F	-8000	
Comenarra to Beecroft Rd	96300	85550		-10800		107700	95250		-12450	
Beecroft to Castle Hills Rd	72200	63550		-8650		77550	69050		-8500	
Castle Hill Rd to M2	93550	78750		-14800	G	104500	86200		-18300	
M2 West	111000	116450	H	5450		124900	137050		12150	
M2 East	99750	95850	I	-3900		109200	106700		-2500	
Phills Rd - South of M2	59850	61700	J	1850		71150	73700		2550	
In + Out of Southern Portal - Table 8.5										
M2 - West				9991	K				14547	
M2 - East				2173	L				4013	
Phills Rd - South of M2				17791	M				21087	
- Total				29955					39647	
Pearce's Cnr Stats										
- on road north	133300	139550	N			145850	156800			
- on road south	150200	131400	O			153600	146600			
- variance	16900	-8150	P			7750	-10200	Q		

Questions and comments arising:

1. It would be good to have the base case traffic numbers, ie. 2013 AADT numbers, as previously raised, but they are not included in the EIS. Why not?

2. It would be good to have a heavy truck equivalent of the above Table, but the numbers have not been provided. SKM had separate truck numbers, why not the EIS?
   The EIS stresses the importance of this project especially for inter-regional freight traffic!

3. What are the 'anticipated land use changes and upgrades to the road network' included in the strategic transport model?

Questions and comments arising (continued):

4. What 'background' growth rates have been built into the modeling from 2013 onward for both truck and non-truck traffic? A question previously asked.

5. Reference above **Table item A**. what explains the 10500 vehicle increase in 2019 on the M1 (F3)? – *The EIS states - minimum changes in future traffic volumes is expected on the M1 (F3) as a result of the project. So why the 'immediate' 11.3% increase?*

6. Refer above **Table item B.** what explains the 4250 vehicle decrease in 2019 on the Pacific Highway north of Pearce's Corner? - *If this Pacific Hwy traffic is forecast to opt for the F3 is this a two way phenomena? and where would the switch be made?*

7. Refer above **Table item C**. what explains the 'with' number being a marginal increase over the 'without' number in both 2019 and 2029? - *If this is related to Pacific Highway traffic being attracted into the tunnel see Question 18 below?*

8. Refer above **Table item D**. which is correct, the above 'with' and 'without' numbers for both 2019 and 2029 or the equivalent numbers in Table 6.2 and 8.4? And, what flow on effect does the correction of this anomaly have?

10. Refer above **Table item E.** – the reduction of traffic on this segment of Pennant Hills Road (19900) is the simplest indicator of tunnel traffic. *So what explains the difference with the 29955 in EIS Table 8.5?*

11. Refer above **Table item F**. what explains the 'without' number for 2029 being less than the 2019 number?

12. Refer above Table - the 'Comenarra Pkwy to Beecroft Road' segment shows 'without' traffic in 2019 at 96300 and 'with' traffic in 2029 at 95250. *These numbers support the EIS conclusion that background growth the spare capacity provided by the tunnel!*

13. Refer above **Table item G**. given that the in-tunnel traffic is the same for all 4 of the Pennant Hills Road segments, the 'tunnel effect' should be shown as a percentage for the 4 segments of Pennant Hills Road, eg.
    - 2019 - 19900 (24.3%), 10800 (11.2%), 8650 (11.9), 14800 (15.8%)
    - 2029 - 8000 (10.2%), 12450 (11.6%), 8500 (11.0), 18300 (17.5%)

    With the following points arising:
    - why the variances in the first segment? (see point 10 anomaly above)
    - lower %s expected for the second segment due to 'intersecting' traffic component
    - third segment tunnel traffic numbers appear low – ? degree of difference to first segment
      - with no 'intersecting traffic' component %s should be higher than 2nd segment
    - regarding the fourth segment – why the variance in %s
      - with Castle Hills Road traffic component included the %s expected to be lower.

Questions and comments arising (continued):

14. Refer above **Table item H**. what explains the increase in 2019 and 2029 'with' numbers over the 'without' numbers when the only thing that has changed is the opening of the 'alternate route' tunnel?

    If the answer is 'a transfer of traffic' where from? And If it's from Pennant Hills Road (south) then it's not reflected in its forecasts (see point 15 below).

15. Refer above **Table item I.** what explains the decrease in 2019 and 2029 'with' numbers below the 'without' numbers when nothing has changed with regard to M2 (East) traffic?

16. Refer above **Table item J**. what explains the increase in traffic numbers as a result of the tunnel? *It should be noted that the Pennant Hills Road (south) traffic growth forecast 2019 to 2029 at 118.9 % 'without' and 119.4% 'with' is greater that any other road segment including the M2.*

17. Refer above **Table item K.** – if the primary purpose of the tunnel was to provide a seamless M7-M2-M1 motorway connection how is it that only 33% of tunnel users in 2017 connect with the M2 (or 37% in 2029)?

    What is the split of the 9991 and 14547 traffic forecasts between trucks and non- trucks? If Northconnex promotional material can refer to 'up to 5000 trucks per day' and in-tunnel traffic forecasts of 8400 heavy vehicles in 2019 and 9800 in 2029 why are these numbers not found in the EIS?

18. Refer above **Table items L+M** – 67% of tunnel users including trucks in 2019 (or 63% in 2029) will use single land ramps and tunnels to enter or exit the main tunnel at the southern interchange when connecting with the M2(East) and Pennant Hills Road (South).

    That is, no seamless connection for 67% of tunnel traffic with increased lane change and merging presenting increase risk but the project claims higher levels of road safety.

19. Refer above **Table items N+O** – this section of the above Table is taking a look at the Pearces Corner or Northern Interchange traffic numbers.

    In simple terms the 'without' traffic on the F3 and Pacific Highway to the north (A+B) should equal the traffic on Pennant Hills Road and the Pacific Highway to the south (C+D). *There is nowhere else for it to go.*

    - but the variances are shown as 16900 in 2019 and 7750 in 2029
    - if the explanation is traffic movements between Pennant Hills Road and Pacific Highway (South) – what explains item Q. being so much less than its 2019 equivalent?

    And – in the 'with' case although the comparative numbers are at least both positive
    - after adding the forecast tunnel traffic numbers of 29955 and 39647
    - the variance at item P. would be 21805 in 2019 and 29447 in 2029
    - but this translates to a 35% increase well above any other forecast increase
    - what explains this level of increase? (see question 20)

Questions and comments arising (continued):

20. If the 2019 to 2029 growth rates were included in the Table above they would show:

- 'without' average 111.1% - after adjusting for the Question 10 anomaly
  high 118.9% - Pennant Hills Road (south)
  low 107.4% - Beecroft Road to Castle Hill Road

- 'with' average 112.5%
  high 119.4% - Pennant Hills Road (south)
  low 108.7% - Beecroft Road to Castle Hills Road

- what explains the above variances around the averages?
- (ref. point 18 comments re the 3rd segment – Beecroft Road to Castle Hills Road).

Conclusion

With all he above matters arising from a limited examination of the Traffic and Transport section of the EIS one is left wondering whether it is in anyway relevant to the approval of the project.

However, in the interests of good process, we submit that without a justifiable set of numbers (traffic forecasts) this project should be refused.

Pennant Hills District Civic Trust Inc

Northconnex EIS Submission – Traffic and Transport

Roadway and Intersection Performance

- the following summaries the voluminous EIS content on this subject.

Extracts from EIS	Existing					2019 With					2029 With			
	AM Peak		PM Peak			AM Peak		PM Peak			AM Peak		PM Peak	
Roadway LoS	N/Bd-S/Bd		N/Bd-S/Bd		I	N/Bd-S/Bd		N/Bd-S/Bd		I	N/Bd-S/Bd		NBdSBd	
					I					I				
- M2 to CH Rd	D	E	E	E	I	D	D	E	D	I	D	E	E	E
- CH Rd to Bee Rd	D	D	D	D	I	D	C	C	C	I	D	D	C	D
- Bee Rd to Comen	E	E	E	E	I	E	E	E	D	I	E	E	E	D
- Comen to Pac Hwy	D	D	D	D	I	D	C	D	C	I	D	D	D	C

Comment:

- the above ratings are only as good as the traffic forecasts – ref. previous questions
- the Castle Hill Rd to Beecroft Road segment C ratings suspect – ref. previous point 13 and 20.
- the Beecroft Road to Comenarra segment ratings are essentially the same in 2013, 2019 and 2029
- AM Peak northbound ratings are the same in 2013, 2019 and 2029

Conclusion – these predictions are highly suspect.

Intersection Performance – Existing				2019			2029	
- Peak	AM	PM	I	AM	PM	I	AM	PM
			I			I		
- PHRd / Beecroft (s)	C	E	I	C	F	I	F	F
- PHRd / Boundary	D	C	I	E	C	I	E	C
- PHRd / Yarrara	D	C	I	C	C	I	E	E
- PHRd / Comen	E	F	I	D	D	I	F	F

Comment:

- the above ratings are only as good as the traffic forecasts – ref. previous questions
- what explains the Beecroft Road intersection being worse in 2019 compared to 2013?
- what explains the Boundary Road intersection being the same in 2019 and 2029?
- the above intersection performance ratings reflect the Pennant Hills Road performance
- why is there no assessment of the secondary roads at these intersections?

Conclusion – these predictions are highly suspect.

Conclusion – it seems that a massive effort has been put into the LoS areas and little into establishing and justifying total traffic and heavy traffic numbers.

In the interests of good process we submit that without a justifiable set of numbers (traffic forecasts and vehicle mix) this project should be refused.

Pennant Hills District Civic Trust Inc

Northconnex EIS Submission – Traffic and Transport

Associated Roads

The Traffic and Transport Executive Summary tells us that the existing and future traffic and transport conditions have been assessed on the road network surrounding the main alignment tunnels and Hills motorway integration works – but what roads?

M1 (F3) Pacific Motorway:

The EIS states that – 'the focus of the study *(EIS?)* has been the impact on the Pennant Hills Road corridor and the M2 Motorway corridor' - **but not the M1 (F3).**

- *the SKM study, confirmed by the MWT review, reported that the F3 capacity is likely to be exceeded in peak periods by 2021 (2 years after planned tunnel opening)*
- ***to proceed without focusing on this issue is surely poor government.***

The EIS states that – 'congestion and long queues on the southbound approaches to the Pennant Hills Road and Pacific Highway interchanges occur on peak periods' **now** and will be partially addressed by the tunnel

- ***but apparently the reverse situation occurring at the Central Coast interchanges on the M1 (F3) can be ignored.***

The EIS states that -'minimal change in future traffic volumes (both light and heavy vehicles) is expected on the M1 Pacific Motorway (F3) as a result of the project' – which in isolation this statement might be true **but**

- *this is no reason exclude the M1 (F3) from the traffic and transport study*

The EIS goes on to state that -' growth in background traffic on the M1(F3) results in a decreased level of roadway and intersection / interchange performance'

. – *making the point that background traffic growth is the issue on the long established F3 motorway.*

The Pacific Highway

The EIS states that **–** the 'Pacific Highway (South of the M1) experiences significant 'without' reduction in performance but it is not as significant as on Pennant Hills Road' **but**

- *surely it is the level of performance that should dictate whether the Pacific Highway should be included in the study of traffic and transport conditions, not the comparison to another road.*

The EIS also states that - 'the northern interchange alterations benefiting the local area'

- *with the 2029 'with' numbers exceeding the 2019 'without' numbers (see N+O in Figure 8.1 analysis) the likelihood of any lasting benefit is minimal.*

For Other Major Roads – the Comenarra Parkway, Boundary and Beecroft Roads

- see previous comments related to tables 8.31 and 8.32.

Conclusion

Northconnex is no more that a Pennant Hills Road bypass proposal devoid of any attention to the wider network and particularly in this case the Pacific Highway (south) and the M1 (F3), and as such it should be refused.

Northconnex EIS Submission – Traffic and Transport

Local Streets

NorthConnex community information sessions and promotional material have repeatedly claimed as a **benefit** –

"the return local streets to the local community"

- but an examination of the EIS has failed to find these words.

The main volume Executive Summary refers to –

- a project objective of "*assisting in a reduction in traffic congestion, particularly along Pennant Hills Road"* and
- a project benefit of "*improving local amenity and connectivity for people living, working and travelling along Pennant Hills Road*

- but there is no reference to the above '**benefit'** within the body of the EIS.

The traffic reality in Pennant Hills is such that there are a number of long established 'rat runs' though local streets, for example, the Bellamy Street / Stevens Street / Yarrara Road route (an RMS designated 'regional road'). Considering the above Northconnex activity it was reasonable for the local community it assume that these streets would cease being used as 3 hour AM and PM through traffic thoroughfares with a traffic count at the Bellamy Street / Laurence Street roundabout of 9915 in 2011.

Reference the **Mitigating Measures** section following.

Conclusion – the local community has been mislead by the Northconnex promise to 'return local streets to the local community' and on this basis the proposal should be refused.

Pennant Hills District Civic Trust Inc. – August 2014

Northconnex EIS Submission – Traffic and Transport

Mitigation Measures

The EIS states that –

- most of the key intersections along the Pennant Hills Road corridor will experience significant congestion during one or both of the AM and PM peak hours in 2029, irrespective of the project…the project would not resolve the existing congestion problems in the local area in the long term.

- the need to undertake additional works from time to time to address longer term congestion across the major network is a separate consideration by RMS in its road network planning and management role

- a separate study into Pennant Hills Road (separate to this project) would be undertaken by RMS and Transport for NSW to investigate public transport improvements and intersection treatments that could be delivered on Pennant Hills Road upon opening of the project.

If there are valid 'additional works' then they should be detailed in the EIS, otherwise the above mitigation remarks are just words.

The problems along the Pennant Hills Road corridor were the reasons behind the SKM Link Study completed in 2004. If there are 'minor work' solutions to these problems why haven't they been implemented over the past 10 years.

If the Government is serious about addressing the above '*significant congestion'* along Pennant Hills Road it should prohibit any significant developments northwest of Pennant Hills.

The 3000 dwelling South Dural proposal, for example, would add significantly to the traffic that accesses Pennant Hills Road and should not be approved until it is proven that the transport linkages can cope with the increased traffic volume.

Conclusion - the above EIS itigation measures statements demonstrate that the Government is happy to 'get what it pays for', that is, a cheap 'missing link' Pennant Hills Road bypass project. This is tunnel is in every sense a toll road operator proposal and as such it should be refused.

Pennant Hills District Civic Trust Inc.

Northconnex EIS Submission – Traffic and Transport

Truck Enforcement Legislation

Northconnex community information sessions and its promotional material when addressing the key objective of reducing the trucks on Pennant Hills Road have indicated that -

> *"Regulatory measures will be introduced – enforcement process and level of fines are still under development"*

The EIS states that –

> *"RMS and Transport for NSW may introduce regulatory measures on the surrounding road network, including introducing, or changing the operation of existing traffic control facilities, advisory and / or regulatory signage, route designations, notices, application of permits, or other traffic measures. Any regulatory measures would need to be consistent with the objectives of the National Heavy Vehicle Law, where applicable".*

The above depicts government to be less than committed on this subject.

But - the EIS also says that the tunnel usage traffic forecasts assumes that the **'regulatory measures are in place'**, although exactly what measures is not mentioned.

And - a Transurban spokesman has made that comment that –

> *"Transurban would walk away from the proposal if the regulatory measures were not implemented"*

And – the community is being told (Ref. Sydney Morning Herald August 26, 2014) that -

> *- "trucks are likely to face heavy fines if they continue to drive along Pennant Hills Road once the tunnel is completed by 2019"*

The **Pennant Hills Road community opinion** is that, if they are to suffer the disruption of the Northconnex construction program, then the proposal must be made to work to its optimum.

Conclusion - a strong enforcement measure (ie. heavy fines) must be part of the proposal approval or the proposal should be refused.