

12 September 2014

**Submission to NorthConnex (unsolicited proposal) -
Environmental Impact Statement**

To Whom It May Concern,

Thank you for the opportunity to make a submission on the Environmental Impact Statement (EIS) of the NorthConnex tunnel project.

I am making this submission in my capacity as a Greens MP and spokesperson for Transport, Roads and Freight.

NorthConnex is a \$3 billion unsolicited proposal from the private toll-road company Transurban that purports to reduce congestion on Pennant Hills Rd by moving freight trucks and cars into 9 km of tollway tunnels linking the M1 (F3 Sydney-Newcastle) at Wahroonga and M2 at West Pennant Hills.

Constructing a road tunnel will not achieve the objectives of reducing congestion or improving transport in the future. Funding must be diverted to improving public transport and rail-freight as alternatives to unnecessary toll-roads such as NorthConnex.

Many communities connected by Pennant Hills Road have expressed concerns regarding the impacts of this project and the lack of meaningful community information and engagement.

Specific issues regarding the EIS and the broader project are highlighted in more detail below.

1.The justification for NorthConnex does not stack up

Travel times on Pennant Hills Rd will still increase if NorthConnex is built (source EIS). Drivers unable to pay the toll will still be forced to travel on congested roads even though a key objective of the NorthConnex project is to assist in the reduction of traffic congestion.

Toll roads with similar lack of justification (e.g. the Lane Cove Tunnel) have failed to meet traffic volumes to be economically viable, a trend repeated globally. Historical preferences for road infrastructure projects in Sydney have not reduced the rising cost of congestion, and NorthConnex is no different as it does not provide a solution to the predicted increases in congestion on West Pennant Hills Road. Alternatives to toll roads can provide the road

traffic reductions necessary to alleviate congestion. However, the EIS does not consider alternatives adequately.

The government's stated primary purpose for NorthConnex is to get freight trucks off West Pennant Hills Road and into the tunnel underneath. While the government has plans to use point-to-point camera systems to analyse the pace at which trucks use Pennant Hills Road and force the trucks that are not making deliveries in the region to pay, the ability of this system to be implemented efficiently in practice is questionable. For example, the EIS does not provide information about the details of this regulatory scheme or any information on what proportion of trucks and heavy vehicles may be exempt from using the tunnel.

2. NorthConnex increases local air pollution and does not work to reduce the greenhouse gas emissions of NSW:

Polluting emissions from trucks can be reduced inexpensively at the source and generate significant returns in community health. If the successfully trialled Diesel Retrofit Program were applied to 5,000 of the dirtiest trucks travelling on Pennant Hills Rd, pollution could be reduced for a fraction of the \$3 billion cost of NorthConnex.

The potentially devastating impact of the tunnels on local communities is perhaps being most strongly felt through the proposed locations of the unfiltered polluting exhaust stacks. Both the northern and southern stacks are located in a valley. The northern stack has been slated for the middle of a residential area in Wahroonga; it will require the demolition of one house, and will be installed just metres away from the homes of other residents and young families. Areas around the stacks also include many schools.

Deaths from air pollution have been rising in Australia. The cost of these pollution-related deaths was \$5.8 billion in 2010 and it was estimated that the effects of road-generated air pollution are far greater than previously thought.

Given this significant impact of air pollution and risks to human health, the EIS does not comprehensively address these impacts, consider mitigation measures or alternatives.

Finally, the project does not recognise or work to reduce the high levels of transport-related greenhouse gas (GHG) emissions in NSW.

3. Alternatives to NorthConnex have not been adequately considered:

Shift from road-freight to rail freight

Although, NSW has a plan to move freight off our roads and onto rail, but funding of road-freight projects is consistently prioritised over rail-freight projects and only 14% of the total freight moved in the Sydney to Newcastle corridor is moved by rail (SKM 2004).

Funding and approving the NorthConnex project conflicts with the government's commitment to increasing the proportion of freight carried by rail.

Further, two-thirds of the projects in the NSW Freight and Ports Strategy (Nov 2013) Infrastructure Program are road-freight projects, with 73% of the fully-funded projects being road freight. However, the benefits of these improvements or increased funding towards further improvements on the number of trucks using Pennant Hills Road have not been investigated in the EIS.

Upgrade public transport options especially Sydney-Newcastle passenger rail services

A small mode-shift to public transport can have large impacts on traffic congestion. NSW has a goal to increase the patronage, frequency and reliability of public transport (see NSW 2021 goals 7, 8, 20) yet public funds are being directed towards toll roads such as NorthConnex. Sixty per cent of the total daily traffic on the F3 is made of traffic to and from the Central Coast with rail currently only having a 43% share of all peak period trips between the Central Coast and Sydney (SMK 2004). This indicates that there are significant opportunities to encourage a mode-shift to passenger rail from private cars.

Upgrades of public transport should include:

- Improving express train services between Sydney and Newcastle
- Introducing tilt-train technology to speed up services, used in Queensland since 1998 (and upgraded in 2010 for \$190 million).
- Separating freight traffic from passenger traffic would improve reliability of services and thus increase patronage.
- Integrating timetables and fares of connecting passenger services in both the Central Coast and the Sydney Metro area. Also include connections for active transport.
- Grade separation of local bus services (bus lanes) along Pennant Hills Road could help to increase the reliability of services in the region, encouraging a mode shift and reducing congestion.
- Connecting the Central Coast to Parramatta by building the Parramatta to Epping Rail Link.

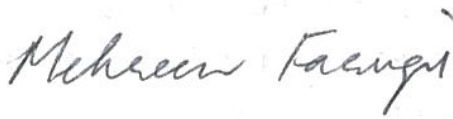
4. Conclusions

NorthConnex does not meet the principles of Ecologically Sustainable Development as its impacts (air pollution, greenhouse gas emissions, human health etc) on the environment and the community will have a long-term negative effect on our communities and the environment.

NorthConnex is not the solution to Sydney's traffic congestion and should be firmly opposed. The government needs to invest in real integrated public transport to promote a mode-shift from private cars and in necessary rail-freight infrastructure to reduce congestion and increase road safety in our communities.

Again, thank you for the opportunity to comment and outline the reasons for my opposition to this project. If you have any questions, do not hesitate to contact my office for further information.

Kind Regards

A handwritten signature in black ink that reads "Mehreen Faruqi". The signature is written in a cursive style with a small flourish at the end.

Dr Mehreen Faruqi MLC
Greens NSW Transport Spokesperson