M4 Widening: EIS Submission

This submission opposes the M4 Widening EIS and suggests the transport planning and funding strategy underpinning the project be fundamentally recast for the following reasons.

1. Transparency, Accountability and Good Governance

The M4 widening is the first stage of Australia's largest transport and urban revitalisation project which in broad terms is expected to cost between $11 billion-$13 billion. The M4 Widening is expected to cost approximately $3.5 billion. The state government has allocated $1.8 billion and the Federal Government has indicated it allocate $1.5 billion as a grant with a further $2 billion as a concessional loan. No details have been provided as to the terms and conditions of the concessional loan.

The WestConnex project in its entirety should be the subject of an overall cost benefit analysis before the project proceeds. At the national level the financing of the project avoids the analytical framework of being subject to a cost benefit by Infrastructure Australia (IA) before the project is approved is contrary to the previous practice of Infrastructure Australia. The recent debate about the national broadband network had as its centrepiece arguments about the lack of a cost benefit analysis and gold plating with the project subsequently undergoing substantial revision.

The State Government has shrouded the project in secrecy avoiding parliamentary scrutiny and wherever possible the release of information under the cover of alleged "commercial in confidence".

This submission argues the Federal and State Government's should as a priority conduct a cost benefit analysis of the entire WestConnex project with all details being made available to the public.

Australia's leading research organisation the Productivity Commission in its paper on Public Infrastructure[1] said "good governance requires disclosure of the evidence base that supports decisions. This provides transparency on how and why projects are planned and prioritised and in doing so, greater confidence to taxpayers that government's (and the community's scarce resources are being well spent…moreover claims for commercial sensitivity are often overstated…international practice in countries such as the United States suggests a trend towards increasing transparency rather the a suppression of cost benefit analysis"[2].

The Productivity Commission Report recommendation 2.3 called for all public infrastructure investment above $50m be subject to rigorous cost benefit analysis and be publicly released.

In a sobering analysis the Productivity Commission as part of its Inquiry commissioned work about project costs and found that "ex ante estimates of costs and benefits being often inaccurate." An international survey showed "that 90% of projects experience cost overruns and the cost overruns in the order of 50% are common."[3]

2. Failure to Consider Other Transport Options.

[1] Productivity Commission: Public Infrastructure Inquiry Report 14th July 2014
[2] Ibid. Volume 1 page 284
[3] Ibid. Volume 1 page 101

The EIS is a transport planning failure. The framework for transport planning has undergone dramatic changes over the last decade. This is represented at the national level by the Living Cites documents, the develop of Infrastructure Australia and a national infrastructure plan; the establishment of infrastructure NSW and the production of a range of planning documents particularly the NSW long term transport master plan.

A key ingredient of these developments has been long term transport planning and integration between the various modes of transport and the promises of new forms of technology being applied to transport solutions. The NSW Long Term Transport Master Plan (NSWLTTMP) indicates integrating roads, public transport and freight to better meet customer needs across transport modes is the required solution.

A standout feature and shortcoming of the EIS is that it only explored individual transport solutions in isolation rather than considering blended transport alternatives in any meaningful detail. Using this method, the EIS goes on to recommend road based transport solutions and excludes any consideration of public transport while also arguing in general terms that complementary modal solutions will be addressed in the WestConnex rollout.

The Parramatta CBD transport corridor of which the M4 widening is an important component is a multi-modal transport corridor. The NSW LTTMP details the multi-modal nature of the Parramatta to the CBD via Strathfield transport corridor. It has the highest number of transit passengers of any corridor in Sydney, concluding that even a modest increase in demand will cause the line to reach capacity in twenty years and that it is often more difficult to travel by rail at peak times.

The construction of the scenarios used in the EIS ensure that a suite of transport measures are not recommended in the EIS. It is argued that the scenarios presented have two major shortcomings.

Firstly, in relation to the road based scenario, only the 'do nothing/minimum alterative' or the 'M4 widening /full WestConnex package' are addressed. No monetary figures are given for the 'do nothing/minimum' or for 'further road based measure improvement' programs.

The EIS notes that smart road technology will not be included in the M4 widening project. It argues against maximising the performance of the existing M4 by the use of a smart motorways system. This system allows the creation of a fully managed road environment which requires the instillation of various technologies. This is a serious omission .The EIS argues that a smart motorway solution alone would not meet the WestConnex/M4 widening objectives.

Secondly, the alterative transport scenarios fail to present options which combine aspects of various alternatives which include investment in public transport, rail freight improvements and demand management.

The brief analysis in the EIS of alternatives of investments in public transport suffered a similar fate in that public transport is not the most effective way of servicing the majority of passenger trips. This submission suggests that a package of public transport measures could equally effectively address the projected increase in demand for transport associated with population growth and demographic change and increase public transport share overall. The EIS indicates public transport improvements are being separately addressed by the state government and that no public transport enhancements are proposed as part of the M4 widening project. This is a major shortcoming.

A symbol of the singularity of the one sided focus of the EIS is that the existing shortcomings of lack of provision for cycle ways evident on the M4 and adjacent road networks will not be improved as

part of the M4 widening project. This runs counter to the NSW LTMTP which calls for a considerable expansion of the bicycle network and doubling of the ridership by 2016.

An extensive submission was made by the NSW Government to IA for funding of a Sydney, inner west bicycle network.

This submission recommends that an alternative scenario be modelled that combines aspects of the various alternatives rather than the all or nothing road transport approach taken in the EIS.

3. Benefits of the M4 Widening/WestConnex.

The EIS argues that the WestConnex project benefits result from the sum of the parts of the project and the M4 Widening can't be seen in isolation. However detailed data is only presented for the M4 widening stage and only generalised information is presented about the overall WestConnex project.

A. Travel Time Savings

The EIS indicates that the savings between Church Street and Homebush Drive would be 9 minutes in the eastbound direction in the AM peak and 1 minute saving in the westbound peak. Further savings with the complete WestConnex are outlined. The major impact on travel time savings is the diversion of traffic from the M4 to Parramatta Rd.

B. Road Safety

A major factor behind freeway building is the benefits that flow from improvements in road safety. However, the improvement to road safety from the M4 widening is very modest. There will be no reduction in the number persons killed. Table 7.37 indicates that the combined M4 and Parramatta Rd road corridor with M4 widening will result in 4% less crashes with casualties and 11% without casualties in the period to 2021. No monetary estimates have made for these very small improvements in road safety.

C. Costs of Congestion

There are numerous reports on the costs and effects of congestion in Sydney from both Federal and State governments. The NSW LTTMP characterise congestion as "An integrated problem that requires integrated solutions. Investment in Sydney's motor network will have a negligible impact unless we simultaneously address wider problems underlying congestion.[4] It estimates road congestion costs the economy $5.1 billion and will rise to $8.8 billion a year by 2020.

The EIS findings on the impacts of the M4 widening/WestConnex project on congestion reinforce the point about investment in Sydney's motorway network.

D. Greenhouse Gas Emissions (GGE)

A range of documents produced by Federal and State governments note Australia's commitment to reduce GGE by 5% by 2020 and the importance of transport as the second highest source contributing 14% of Australia's total GGE, that the transport sector emissions overwhelmingly come from road transport and that transport GGE have not declined. Reducing transport emissions is a major challenge. The NSW LTTMP noted that "providing people with opportunities to use public transport instead of private vehicles will help to

[4] NSW Long Term Transport Master Plan page 105. The Plan observes that congestion will grow at 6.8% per annum over the decade which is double the growth rate of the previous decade and nearly triple the rate of economic growth. This will adversely impact on national productivity and national, state and local economies.

reduce the environmental impact of transport in NSW and that increased walking and cycling, particularly for short local trips will contribute to improved environmental outcomes."[5]

The EIS indicates that while the M4 widening project in 2017 would lead to a reduction in emissions in 2017, emissions over the WestConnex route would increase by 3% in 2027. The question that needs to be answered is where are the reductions in transport GGE going to come from given the current transport policy framework is working to increase emissions?

E. Urban Revitalisation

The WestConnex Business Case noted that that the project is the largest transport and urban revitalisation project in Australia. This submission argues that the transport and urban renewal of the Parramatta Rd corridor should be addressed simultaneously. Urban revitalisation is being coordinated by Urban Growth NSW and a paper is timetabled to be released at the end of the year.

This submission argues these two projects need to be integrated.

The EIS notes that the introduction of tolling on the M4 will cause a major diversion of traffic to Parramatta Rd. The EIS notes the difficulties of predicting the response by road users to tolling and given the history of the campaign to remove the tolls and their re-emergence on a brownfields site and probably underestimates their impact.

The urban revitalisation will add considerable traffic increases in the Parramatta Rd corridor. The EIS will need to be revised to take into account the forthcoming urban revitalisation program.

F. Impacts of the Second Airport at Badgery's Creek

The major reasons for the WestConnex are to link the western suburbs to the international gateways represented by the Sydney Airport and Port Botany. Considerable attention was paid to the projected growth in passenger and freight numbers at Sydney Airport.

The Federal Government earlier this year announced support for fast tracking development of Sydney's second airport located at Badgerys Creek. The Federal Budget announced a $3.5 billion roads upgrade package for Western Sydney, a substantial proportion of which will be allocated to road infrastructure for the second airport.

This submission argues that the EIS should be reconfigured to take into account the traffic, land use and job implications of the second airport for the periods up to 2031 and 2050. A report by Deloittes, though needing to be treated cautiously, argues that an airport operating from 2027 will generate close to an additional 30,000 jobs and $9 billion in economic output for Western Sydney by 2050.

4. Sydney as a Globally Competitive City.

The EIS refers to the need for Sydney to compete with other major Asian cities and refers specifically to Hong Kong, Shanghai and Singapore. What the EIS doesn't do is to examine the transport policies which have enabled these cities to become the benchmarks for globally competitive cities. The difference between the current and prosed transport pan for Sydney as represented by the

[5] Ibid page 35.

WestConnex is a sharp focus on road transport solutions as the first priority. This is in sharp contrast to the transport and land use policies of these cities.

This submission recommends that the EIS be amended to include a comparison of the transport planning, funding and land use policies of these three global cities.