



Action for Public Transport (N.S.W.) Inc.

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23 September 2019

SSI 7485 M4-M5 Link (Rozelle Interchange) MOD 2

16516 The Crescent overpass

Submission on Environmental Impact Statement

Action for Public Transport (NSW) is a transport advocacy group active in Sydney since 1974. We promote the interests of beneficiaries of public transport - both of passengers and the wider community. We make this submission on the EIS for the proposed The Crescent overpass. We oppose the proposed modification of the approval relating to application number SSI 7485:

- The proposed modification has clearly been generated by a misconceived attempt to mitigate traffic congestion expected to be caused by the Western Harbour Tunnel/Beaches Link. Those projects have not been approved, and we contend that they should not be. There are many worthwhile and effective projects that should be progressed instead.
- The proposed modification runs directly counter to the needs of pedestrians and cyclists. Almost all public transport users are pedestrians at the beginning and end of their journeys. Some use bicycles to cover the "last mile" of their journeys.

"Walkable" environments that provide comfortable and direct pedestrian connections to public transport contribute to better health outcomes, as well as superior social, economic and environmental outcomes.

The proposal

The key component of the proposed modification is the construction of an elevated road that did not form part of the Approval granted by the former NSW Minister for Planning on 17 April 2018 (application number SSI 7485). All the other components of the proposal flow from this additional, above-ground structure ("The Crescent overpass").

In particular, the proposed downgrading of pedestrian and bicycle connections between the Rozelle Rail Yards and the eastern side of The Crescent flows directly from the proposed "Crescent Overpass". Table 4-2 makes this abundantly clear, saying that the Green Link that formed a critical element of the approved scheme:

would not allow the construction of The Crescent overpass as the two structures would conflict with each other due to their horizontal and vertical alignments.

The Assessment states that compliance with the project approval ("Option 1") was "*discounted as it would not allow The Crescent overpass to be constructed*" (p.4-7).

Justification

According to paragraph 4.1 of the Assessment,

The contractor or the proponent may offer an alternate design or construction methodology that has a beneficial project outcome in consideration of environmental and social impacts.

The construction of an entirely new elevated road and the serious downgrading of pedestrian and cyclist access to allow that to happen goes well beyond "*an alternate design or construction methodology*".

Moreover, the Assessment does not establish that the change would have "a beneficial project outcome in consideration of environmental and social impacts". It concedes in several instances that these impacts are likely to be worse, and on that basis suggests the extension of mitigation measures to more residents.

The aim of the proposed modification is said to be "*to improve intersection performance and optimise active transport connections*" (1.4.2). This is somewhat Orwellian, given that the modification proposes to downgrade the approved active transport connections.

The proposed modification has been sparked by traffic modelling that predicts that the proposed Western Harbour Tunnel project would worsen the performance of intersections on the roads approaching the Anzac Bridge. That is, it would worsen traffic congestion. This is apparent from Table 4-1, in which complying with the Minister's approval is described as "Option 1":

Updated traffic modelling has identified that the at-grade signalised intersection proposed by Option 1 would likely result in inferior intersection performance at the two key intersections (City West Link/The Crescent and The Crescent/Johnston Street) by comparison to the other options.

In addition, the EIS design would not provide sufficient capacity for additional traffic generation should other proposed projects, including the proposed Western Harbour Tunnel and Warringah Freeway Upgrade project ("Western Harbour Tunnel project"), receive planning approval. As a result, additional works would be required at the intersection in the future resulting in increased construction works over a longer timeframe around The Crescent/City West Link intersection.

Intersection performance is the only issue given genuine consideration in the Assessment. The performance of the transport system for pedestrians, cyclists and public transport users is given grudging attention - but deterioration is presented as "optimisation".

In truth, the proposed modification has nothing to do with securing "*a beneficial project outcome in consideration of environmental and social impacts*" and everything to do with removing an impediment to the Western Harbour Tunnel and Beaches Link, regardless of environmental and social impacts.

An exercise in futility

The problem at the root of the proposed modification is that a deluge of vehicles from a "Western Harbour Tunnel/Beaches Link" would overwhelm the road system in the vicinity of Victoria Rd Rozelle and the Anzac Bridge. Exactly the same thing should be anticipated at the other end - Northern Beaches roads overwhelmed by traffic from Westconnex.

The proposed response is to "provide additional network capacity" which means tacking still more road space onto an already massive spaghetti junction (this time above ground rather than in a tunnel, an option summarily dismissed in Table 4.1).

This is a conventional "predict and provide" approach, and it has been known for many years that it does not work. Continual increases in road space induce continual increases in the number and length of car trips. Any improvement quickly dissipates, as empirical evidence has established time and time again. The EIS for the "new" M5 for example recorded (p.9) that the "old" M5 was congested within just six months of its opening in 2011¹.

Sabotaging public transport

Relevant ATAP Guidelines (*T1 - Travel Demand Modelling*) contain the observation that a modal shift from public transport can account for up to half of the estimated induced traffic on a road corridor (2016, p.29). A practical example can be found in the case of the Westconnex EIS, which predicts that *45,000 journeys will switch from public transport to road trips on WestConnex on an average weekday by 2031* (Searle and Legacy, 2017, citing RMS)².

The B-line has greatly improved public transport services on the Northern Beaches. The effect of the Western Harbour Tunnel/Beaches Link would be to rob it of patronage and impede its effectiveness by encouraging more vehicles onto the Peninsula.

APTNSW suspects that many Government members know that the Western Harbour Tunnel and Beaches Link will not ease Sydney's road congestion. Transport planners certainly do.

The completion of the North-West Rail Link by contrast has achieved reductions in congestion levels. The most effective approach is better public transport coupled with demand management strategies.

We appreciate that after years of neglect, there has been significant investment in public transport services in recent years, and more improvements are on the drawing board. Future Transport 2056 and its companion documents (Greater Sydney Services and Infrastructure Plan, Regional NSW Services and Infrastructure Plan, Greater Newcastle Future Transport Plan) contain many worthwhile proposals³. The proposed network

for Sydney shown as Figure 56 in that Strategy is reproduced below.

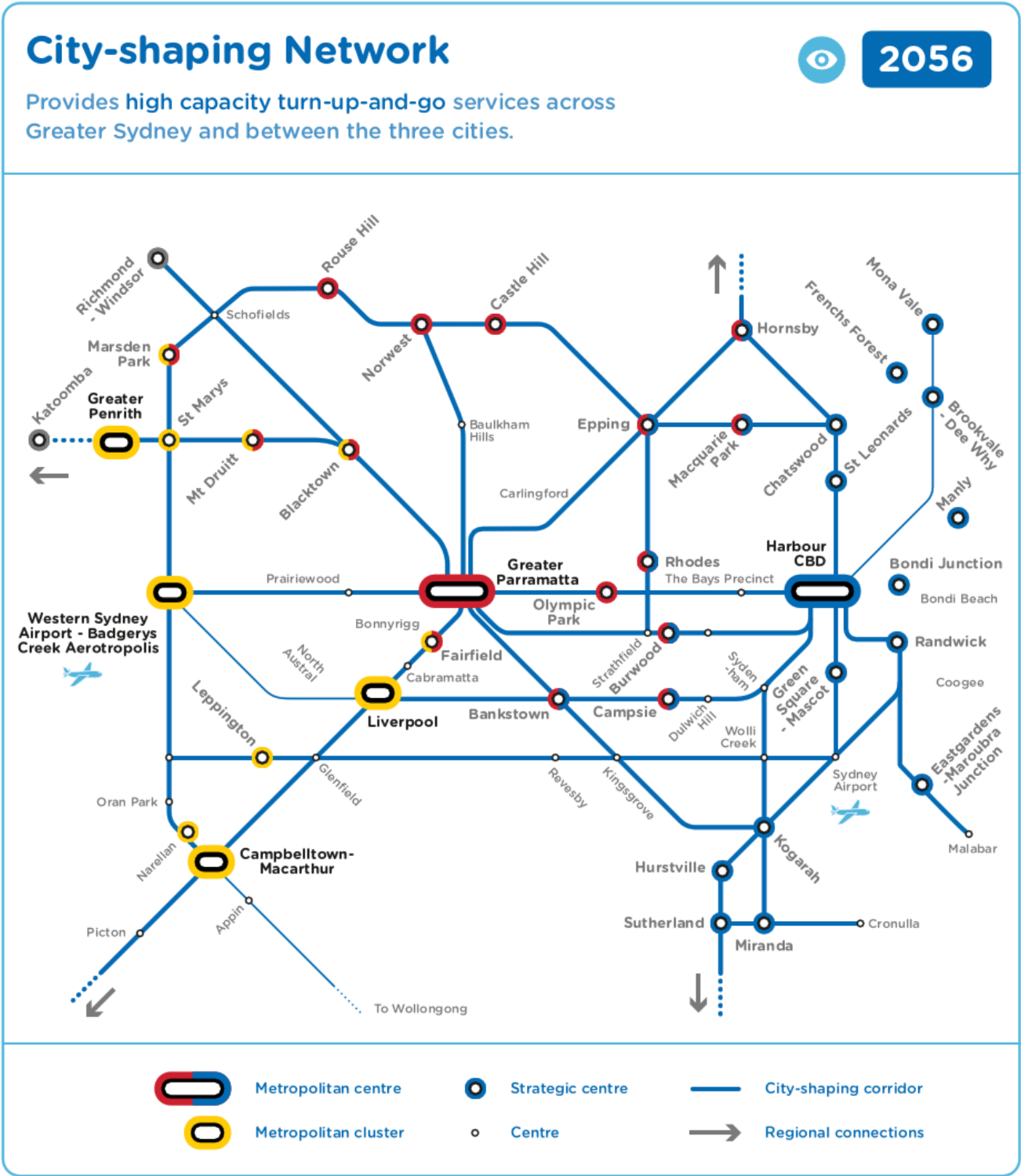


Figure 51: Greater Sydney Mass transit/train Network (visionary)

Inexplicably, while motorways feeding the Sydney CBD are fast-tracked, the bulk of the public transport improvement proposals are relegated to the medium to distant future. Regional public transport improvements (such as faster rail connections) remain in limbo.

Our view is that filling missing links in the public transport system and disentangling the passenger rail network from the rail freight network warrant much higher priority. In no particular order, APTNSW would nominate the recently resuscitated Metro West, a rail link (whether metro or light rail) between Parramatta and Epping, straightening the Newcastle rail line, and improving service on the Illawarra line by building the Maldon-Dombarton link.

In the case of the Northern Beaches, the new metro railway at Chatswood connects to the north-west and is being extended south to the Sydney CBD. Lasting benefit could be achieved by connecting the metro eastwards from Chatswood to create the long-overdue Warringah railway.

Escalating commitment to a failing strategy

APTNSW is concerned that approval of this modification would undermine proper consideration of the unapproved Western Harbour Tunnel and Beaches Link projects. There is a real risk that it will stymie consideration of other ways to give people access to jobs, services and educational opportunity.

The Assessment report is careful to attach the caveat "*should that project proceed in the future*" to its frequent references to the unapproved Western Harbour Tunnel and Beaches Link projects. It is difficult though to escape the conclusion that the proponent regards approval of the Western Harbour Tunnel/Beaches Link as a "done deal". The rationale for the proposed Crescent overpass is closely tied to the Western Harbour Tunnel/Beaches Link projects; yet construction of the overpass is proposed *without any such qualification*.

Approval of the modification would place the Minister for Planning and the Minister for Transport in a very difficult position. If the Crescent overpass is built, the Minister for Planning will be under enormous pressure to approve the Western Harbour Tunnel/Beaches Link projects and the Minister for Transport will be put under pressure to fund it all.

They will face an argument that the money already spent in an (ultimately futile) attempt to accommodate traffic generated by the Western Harbour Tunnel/Beaches Link projects would be wasted if the project is dropped.

This is a classic "sunk cost fallacy"⁴, an error in reasoning also captured in the saying "throwing good money after bad". All money spent on urban motorway projects is wasted if they consistently fail to achieve their stated aim (reducing congestion). Empirical evidence clearly shows that this is the case.

The argument is however superficially plausible, and often succeeds. Decision makers can find themselves "locked in" to a particular decision irrespective of the results of any proper assessment process. Whether this is an intended outcome in this case we cannot say.

Conclusion

The construction of an entirely new elevated road and the serious downgrading of pedestrian and cyclist access to allow that to happen goes well beyond "*an alternate design or construction methodology*". It will not secure a *beneficial project outcome in consideration of environmental and social impacts*. Quite the opposite.

Westconnex and its unapproved offshoots, the Western Harbour Tunnel and Beaches Link projects, are a juggernaut careering across Sydney, trying to mitigate the harm it is causing by doing more of it. This will neither reduce congestion nor connect communities. It is a colossal waste of money that could be directed to worthwhile projects.

APTNSW submits that this proposed modification should be rejected.

Footnotes

1. https://www.aptnsw.org.au/documents/new_m5_eis.html
 2. Glen Searle and Crystal Legacy 2017. Do the business cases for major Australian transport infrastructure adequately incorporate planning concerns? Paper presented at the State of Australian Cities conference, Adelaide, 2017
 3. https://www.aptnsw.org.au/documents/future_transp_strat_2056_submission.html
 4. Daniel Kahneman 2011 Thinking, Fast and Slow pp.343-346
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Secretary
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