

**Submission
No 98**

INQUIRY INTO ROAD TOLLING

Organisation: WestCONnex Action Group
Date received: 28 February 2017



Submission to the General Purpose Standing Committee No 2

Inquiry into road tolling

This document contains the formal submission made by WestCONnex Action Group Incorporated (WAG) to the aforementioned Inquiry.

WAG is a community group made up of residents from across western, inner and south-west Sydney. We are not affiliated with any political party.

For enquiries relating to this submission, please contact us at:

WestCONnex Action Group

PO Box 3249

Marrickville Metro NSW 2204

info@westconnexactiongroup.org.au

1.0 Terms of reference

We note that the terms of reference for the Inquiry are as follows:

1. a review of the tolling regimes in place on different roads and an explanation for the differences between each
2. the process for determining how tolls are set for all types of vehicles, the length of tolling concession periods, the rationale for extending these concession periods and opportunities to increase transparency for the public, particularly given the absence in some instances of any competitive process
3. how tolling contracts are negotiated and varied and opportunities to increase public scrutiny and accountability of the negotiations that take place between private tolling companies and the NSW Government
4. the rationale for allowing higher than CPI increases on certain tolls
5. the extent of any consultation undertaken with the trucking industry before changes are made to tolling regimes



westconnexactiongroup.org.au



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6. the appropriateness of involving the Independent Pricing and Regulatory Tribunal (IPART) in the determination of tolls and their escalation, given the involvement of IPART and other such independent regulators in setting public transport fares and other services such as electricity transmission and distribution charges
7. opportunities to increase the assurance to the public that tolling arrangements represent the fairest possible outcome
8. an examination of road tolling arrangements in overseas jurisdictions, and
9. any other related matter.

2.0 Overview of issues covered in this submission

WAG's submission addresses the following issues with road tolling in NSW:

1. Tolling regimes that deliver private profit rather than ongoing public benefit
2. Lack of transparency around tolling arrangements
3. New tolls levied on existing motorways to subsidise other toll roads
4. High rates of annual toll increases
5. Toll saturation
6. Tolls charged on roads that fail to improve the road network
7. Power over city planning handed over to private corporations
8. Toll costs borne by residents least able to afford it.

Due to the nature of our group, our commentary will focus primarily on the WestConnex toll road scheme, including the M4 Widening, M4 East, New M5, M4-M5 Link, and proposed extensions such as the Southern Connector, Sydney Gateway, Western Harbour Tunnel.

3.0 Issues with road tolling in NSW

3.1 Tolling regimes that deliver private profit rather than ongoing public benefit

WAG notes that road charging in itself does not need to be inherently unfair. University of Sydney researchers have found that most drivers can actually be better off under a such a system if expenses such as vehicle registration and unfair tolls are scrapped.¹

¹ <http://www.smh.com.au/comment/why-sydney-needs-congestion-20160510-gos5dz.html>



As well as being an effective way to ration road space², road charges can also help ensure the full costs of road travel are covered by road users.

In overseas jurisdictions such as London and Stockholm, road charging has also been shown to be an effective at reducing traffic congestion by prompting drivers to shift to alternate modes such as active or public transport, car sharing, or avoiding car trips at the most congested times of day, or eliminating unnecessary travel altogether. A key factor in the success of this strategy is the quality and availability of alternatives to motorways, such as integrated and effective public transport, which much of Sydney currently lacks, particularly throughout the west.

Road travel creates other external costs for society in addition to congestion. Perhaps the most significant is the damage caused to the environment and human health by vehicle emissions. With the right policies in place, road charging can be used to help cover the costs of these environmental externalities.

In cities like London, congestion charges are also reinvested into improving the city's transport network, and particularly subsidising public transport infrastructure.

However, WAG notes that the tolls being proposed for WestConnex and its extensions are very different to these kinds of congestion charges, which are designed to deliver ongoing public benefits in the form of improved public transport, reduced congestion, and so on. This is because after the public has borne the upfront cost and risk of building WestConnex, the NSW Government plans to sell the tolling concessions off to a private corporation or corporations, which will have the right to charge tolls on each stage of WestConnex until at least 2060.

While the revenue from this sale is supposed to be reinvested into public infrastructure, the reality is that this outcome is not guaranteed - particularly if WestConnex fails to recoup its massive cost, and no profit is realised. Once these roads are sold, the revenue from the tolls themselves will deliver profits to the private companies, not the public.

² <http://www.smh.com.au/comment/why-sydney-needs-congestion-20160510-gos5dz.html>



It is WAG's position that if road charges are to be introduced in NSW, the revenue earned should be used to deliver ongoing public benefits - not large profits to a limited number of private corporations and their shareholders.

3.2 Lack of transparency around tolling arrangements

As with most aspects of WestConnex, the NSW public has not been allowed access to any of the documents or negotiations surrounding the setting of tolls, or the contracts for the sale of tolling concessions. For example:

- All but the most topline financial figures have been redacted from the WestConnex Updated Strategic Business Case.
- The NSW Government under former Premier Mike Baird and current Premier / former Treasurer Gladys Berejiklian privatised the government corporation responsible for building WestConnex, the Sydney Motorway Corporation (SMC), and made it immune from freedom of information requests and any responsibility for disclosing its contracts publicly.
- Any contracts relating to the sale and tolling arrangements are also expected to remain shielded from public scrutiny.

What we do know is that the private owner of WestConnex is to be granted the toll concessions until at least 2060. Tolls will also rise at the rate of at least 4% a year or CPI, whichever is higher. No rationale has been provided to the public to justify either the decades of tolls that drivers will face to use the roads, or their very high rate of increase.

It is WAG's belief that as a publicly funded project, WestConnex should be subject to the same level of scrutiny as any public project, and the SMC subject to the same transparency and accountability requirements as any public corporation.

Without this transparency - and with profits the core focus of privatised motorways - there is a very high risk that the tolling arrangements will not represent a fair outcome for the NSW public. Also of concern in regards to these contracts is the potential inclusion of 'no compete' clauses designed to maximise the profits for the private owner, and prevent improvements or investment in competing transport networks for decades. Such clauses should be specifically barred from tolling contracts through legislation.



3.3 New tolls levied on existing motorways to subsidise other toll roads

The NSW public is accustomed to tolls being collected on new toll roads to fund their construction and maintenance, even though this results in a very inefficient and inequitable road-pricing regime.

However, WestConnex's \$17 billion cost (which excludes many significant costs associated with WestConnex, including land acquisitions and related network enhancements) cannot be met using this funding model, despite receiving Federal and NSW government subsidies totalling \$5.1 billion to date.

For this reason, the construction of WestConnex is to be part-funded by introducing tolls on two existing and publicly owned motorways that are currently toll free: the M4 between Parramatta and Concord, and the M5 East. Like other WestConnex tolls, these will be charged until at least 2060.

In addition, the private owner of WestConnex will be granted the toll concession for the existing M5 West from 2026 (when the current concession ends) until 2060.

A toll of \$8 a day will be introduced on the M4 later this year, and a toll of \$14 a day will be introduced on the M5 East in 2020. In addition, the M5 West toll will be extended beyond 2026 – when it had been due to end – meaning the whole M5 is set to cost \$27 a day, with no cashback. Trucks will pay three times this rate.

What this means is that western Sydney motorists will be charged high tolls to subsidise the most expensive, and least profitable, parts of WestConnex for decades.

This model of using public funds to plan and construct private tollways only emerged because of the private sector's reluctance to risk its own money on WestConnex following a series of failed Australian toll road projects. The development of the public funded model was driven by companies such as Macquarie Capital, Leightons (CIMIC) and AECOM, which directly benefit from the new model.³ It is hard to see how the public interest was protected by this funding process, given the companies that helped develop it are also the ones that stand to profit from it.

3

<https://newmatilda.com/2016/05/18/tunnel-collapse-the-insider-emails-that-show-westconnex-in-a-new-light/>



westconnexactiongroup.org.au



info@westconnexactiongroup.org.au



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3.4 High rates of annual toll increases

WestConnex's tolls are to rise by the rate of 4% a year or CPI, whichever is higher. While this is in line with increases on the M2 and Eastern Distributor, it is a much higher rate of increase than the majority of other tolled roads in Sydney, including the M7, M5, Lane Cove Tunnel and Cross City Tunnel.⁴

No justification has ever been provided to the public around why WestConnex tolls are set to increase at such a high rate each year, or how these increases were negotiated or calculated. It appears designed merely to fund the hugely expensive cost of building the tunnelled parts of WestConnex, and to increase the attractiveness of the tolling concessions for the eventual sale of sections of the tollways to the private sector.

3.5 Tolls charged on roads that fail to improve the road network

WAG recognises that people may be willing to pay tolls if they can afford to, and if they perceive that doing so delivers a significant benefit in terms of travel time savings. However, in the case of WestConnex, the only independent analysis of the project's Updated Strategic Business Case found that travel time savings were not dependable, and in fact may be imperceptible or non-existent for most road users.⁵

Given that the combination of high tolls and small travel time savings has been cited as the key reason for the financial failure of the last four toll roads built in Australia (Sydney's Cross City Tunnel and Lane Cove Tunnel, and Brisbane's Airport Link and Clem7), it appears as though the same combination could well lead to the financial failure of WestConnex.

If that is the case, tolls on the WestConnex roads will fail to deliver any substantive benefit to road users, communities or taxpayers.

WAG notes too that all four failed toll roads above were purchased by a single corporation, Transurban, which paid a fraction of the roads' construction costs to do so. Should the same fate befall WestConnex, it is the general public that stands to lose

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<http://www.smh.com.au/nsw/westconnex-new-sydney-motorway-to-push-toll-to-11-per-trip-20150507-ggw9ky.html>

⁵ SGS Economics & Planning, *WestConnex Business Case Review Final Report*, February 2016.



westconnexactiongroup.org.au



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financially, as the majority of the road's construction costs have been borne by NSW and Federal governments, using public taxpayer funds.

The following excerpt is taken from pp31-32 of the independent analysis referred to above, which was performed by SGS Economics & Planning on behalf of the City of Sydney:

“Travel time savings resulting from WestConnex are generated primarily during peak periods. Non-peak periods have very low travel time savings, throwing doubt over who would use the road during such periods.

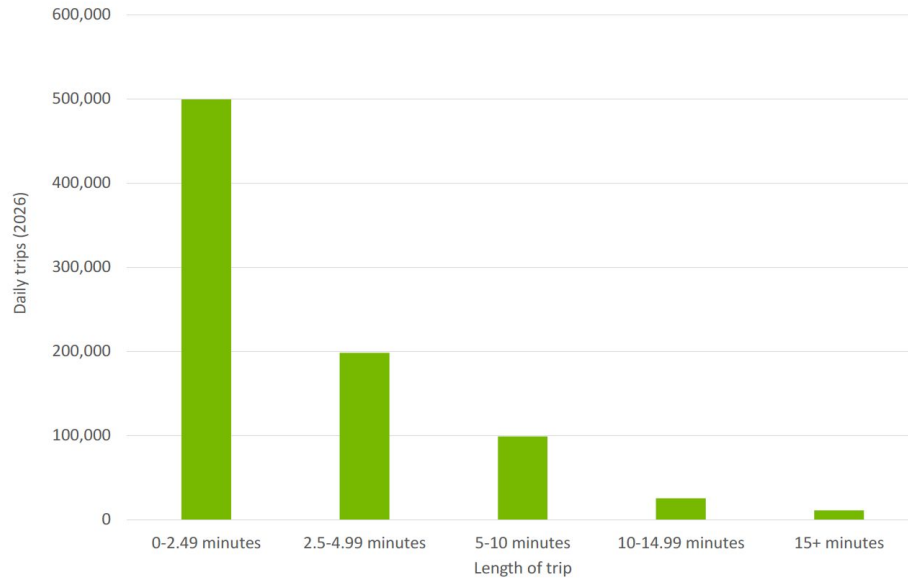
In a review of the Lane Cove Tunnel and Cross City Tunnel, the Roads and Maritime Services (RMS) describes that “*the majority of travel time savings were less than five minutes (which are often not realised and can be considered inframarginal in economic terms)*” (RTA 2010). Inframarginal means that they are within the margin of error of the modelling or/and cannot be observed by road users. In the case of the Lane Cove Tunnel, when travel time savings of less than five minutes were removed from the analysis, this BCR decreased by approximately 50 per cent.

Using data from the Zenith Model (which produces results broadly consistent to the WRTM) the distribution of travel time savings from WestConnex was used to replicate this five minute inframarginal analysis suggested by the RMS. The data for 2026 shows that 832,000 trips gain travel time saving from WestConnex. Table 10.1 from the *Updated Strategic Business Case* has 788,100 trips along WestConnex and the existing M4 and M5 in 2031. In accounting for additional trips on surface roads which may gain a travel time benefit, the result from the WRTM and Zenith appear broadly consistent.

Figure 14 shows the number and length of daily trips on WestConnex in 2026. From a total of 831,000 trips on WestConnex in 2026, the majority (499,100 or 60 per cent) result in a travel time saving of less than 2.49 minutes. With such a short time saving for the majority of trips, there is a risk these time savings will not be discernible to motorists and in turn, that patronage forecasts will not be achieved.



FIGURE 14. AVERAGE TRAVEL TIME SAVINGS BY NUMBER OF TRIPS WITH WESTCONNEX (2026)



The midpoint of each time group was used to estimate the time saving and a \$45 dollar cost of time was used to estimate the travel time saving benefit. \$45 is the estimated weighted average of value of time for business, commuter, freight and other private trips in the *Updated Strategic Business Case*.

Excluding trips with a travel time saving of less than five minutes from the travel time savings would reduce the benefit from \$12.9 billion to \$5.9 billion (a 55 per cent reduction). The removal of these small travel time savings would reduce the project BCR from the recalculated 1.64 to 1.12.

If the same analysis is applied to only Stages 1 and 2 the travel time savings benefits are reduced by 70 per cent.”⁶

In addition, an analyst from the University of Sydney’s Institute of Transport and Logistics Studies (ITLS), Chris Standen, has also pointed out that other supposed benefits of WestConnex - including making “life easier for hundreds of tradies, couriers and freight operators who rely on Sydney’s roads every day”⁷, and taking trucks off

⁶ SGS Economics & Planning, *WestConnex Business Case Review Final Report*, February 2016.

⁷ <https://www.westconnex.com.au/about>



surface roads⁸ - are unlikely to be realised. In a recent article for *The Guardian*, Mr Standen noted:

“[B]y increasing the competitive advantage of road freight over rail, [WestConnex] will actually encourage more trucks onto the road network. During peak times, truck operators will pay to use the tollroads. However, they are likely to avoid the tolls at other times, meaning more trucks on suburban streets off-peak, and at night.”⁹

3.6 Toll saturation on the Sydney road network

Roads like WestConnex, its associated extensions, and NorthConnex will all add to Sydney’s already vast and increasingly interconnected network of tollways.

In 2015, a landmark study performed by Prof David Henscher, Chinh Ho and Wen Liu from the University of Sydney’s Institute of Transport and Logistics Studies (ITLS) found that this proliferation of tolled roads will increasingly see drivers hit their financial limit when it comes to paying new tolls, and ignore tolled routes - even if they’re faster - for non-tolled alternatives.¹⁰

Prof Henscher’s study, which was the first to look at the cumulative impact of multiple tollways, stated that with nine existing tollways in place, and another five now under construction:

"The evidence suggests that many commuters in Sydney are already close to their toll budget threshold, which when reached will flatten the commuter's willingness to pay to save extra commuting time." ¹¹

8

<http://www.transport.nsw.gov.au/sites/default/files/b2b/media/med-rel-westconnex-delivery-authority-established.pdf>

9

<https://www.theguardian.com/commentisfree/2017/feb/27/westconnex-is-a-bad-deal-for-motorists-and-taxpayers-who-is-it-good-for>

10

<http://www.smh.com.au/nsw/sydney-motorists-unwilling-to-pay-for-more-toll-roads-study-20151110-gkv5b3.html>

¹¹ Hensher DA, Ho C and Liu W 2016 'How much is too much for tolled road users: toll saturation and the implications for car commuting value of travel time savings?', *Transportation Research Part A: Policy and Practice*, vol.94, pp. 604-21



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This finding is particularly relevant to WestConnex, which by its own promotional material is reliant on creating a network of “free-flowing motorways”¹² to be successful, all of which are to be tolled.

The findings made by Henscher et al suggest that, with drivers fast approaching toll saturation, the benefits of this “free-flowing” network will be nowhere near as valuable as the official paraphernalia suggests, and that drivers will opt for the non-tolled roads instead - roads that are already heavily congested, and that WestConnex was supposed to relieve.

In 2015, the SMC’s chief executive Dennis Cliche confirmed that WestConnex was to trigger an overhaul of the entire toll road system across Sydney, leading to more tolls being introduced on roads that are currently toll free.¹³ If this happens, the toll saturation effect highlighted by Henscher et al is likely to be even more pronounced, and make it even more likely that drivers will avoid tolled roads in favour of non-tolled alternatives.

3.7 Power over city planning handed over to private corporations

In regards to WestCONnex, WAG finds it incredibly disturbing that many of the corporations that stand to benefit from its construction and operation - including AECOM (formerly Maunsell), Macquarie Capital and CIMIC (formerly Leightons) - were invited in at the very beginning by the NSW Coalition government to help design and justify WestConnex.¹⁴ Given their vested interests, it is hard to believe that the NSW public can be assured that decisions related to WestConnex, including its status as a toll road and its tolling arrangements, represent the fairest possible outcome for the public.

WAG notes as well that, as per the rest of Australia, one particular company holds what has been described by Morgan Stanley as a “meta-monopoly”¹⁵ over NSW’s toll roads. Transurban currently controls 13 out of 15 toll roads across Australia,¹⁶ is building NorthConnex with the help of taxpayer-funded subsidies from the Federal and NSW

¹² <https://www.westconnex.com.au/what-westconnex>

¹³ <http://www.smh.com.au/nsw/westconnex-to-trigger-sydney-tollroad-overhaul-20150417-1mnbze.html>

¹⁴

<https://newmatilda.com/2016/05/18/tunnel-collapse-the-insider-emails-that-show-westconnex-in-a-new-light/>

¹⁵ <http://www.theage.com.au/victoria/transurban-the-making-of-a-monster-20160512-gotjm9.html>

¹⁶

<http://www.smh.com.au/national/investigations/toll-giant-transurban-wants-to-charge-for-all-roads-20160513-goup2i.html>





government of up to \$405 million each,¹⁷ and has already declared an interest in buying into parts of WestConnex.

Transurban is a company that has been exposed as one that pays very little tax,¹⁸ makes significant political donations, and has publicly declared that "Our interest was only ever the road network, and the cash".¹⁹ It is notorious for working non-compete clauses into its toll road contracts²⁰; for slugging drivers huge penalty fees, some of which have resulted in loss of licences, and many of which were due to innocent customer mistakes, or system errors or poor communication from Transurban.²¹ Serious concerns have also been raised about these mistakes, and the abuses of power exercised by Transurban that have dramatic negative impacts on the lives of ordinary Australians.²²

Transurban is also a company that has been publicly noted for its ability to outmaneuver governments during negotiations over toll roads. As former Victorian Premier Jeff Kennett told The Age: "Money, instead of going to government, is going to the private sector; that is a total waste".²³

According to former NSW Auditor General Tony Harris:

"When [Transurban] leave a negotiating room nothing is left on the table, not even the Laminex. They just have this reputation for being superb negotiators at the taxpayers' expense."²⁴

Handing such a huge amount of power over the way we live, move and work to a private company that is solely motivated by the huge profits that can be made from toll-paying drivers is no way to ensure the maximum public benefit is achieved from our transport network. It is a surefire way to lock in car dependency, particularly among

¹⁷ <https://www.transurban.com/our-operations/our-projects/northconnex>

¹⁸ <http://www.michaelwest.com.au/why-transurban-says-the-taxman-can-wait/>

¹⁹ <http://www.theage.com.au/victoria/transurban-the-making-of-a-monster-20160512-gotjm9.html>

²⁰ <http://www.theage.com.au/victoria/transurban-the-making-of-a-monster-20160512-gotjm9.html>

²¹ <http://thescandal.com.au/news/transurban/transurban-a-case-for-a-senate-inquiry-31-8-2016>

²²

<http://www.9news.com.au/national/2016/08/31/19/47/major-toll-road-operator-under-fire-over-unpaid-fine-changing-methods>

²³ <http://www.theage.com.au/victoria/transurban-the-making-of-a-monster-20160512-gotjm9.html>

²⁴ <http://www.theage.com.au/victoria/transurban-the-making-of-a-monster-20160512-gotjm9.html>



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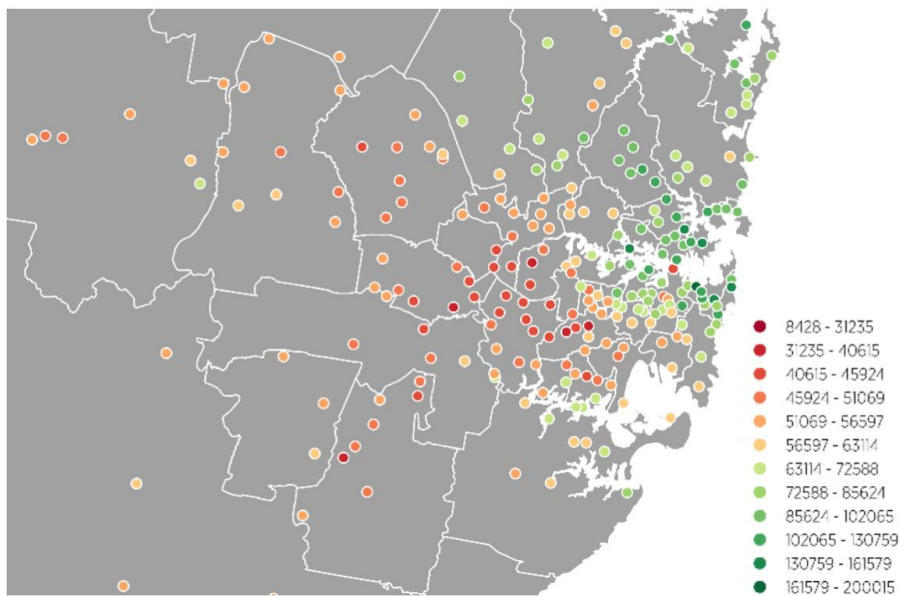
those people and communities who have the least ability to move to areas that are better served by public transport, jobs, lifestyle opportunities, and more.

3.8 Toll costs borne by residents least able to afford it

Western Sydney motorists will be the hardest hit by incoming tolls on the WestConnex motorway. Tolls on the M4 alone, when re-introduced sometime this year, will cost regular commuters on the road over \$2,000 in tolls alone.²⁵

This is deeply concerning, because there is evidence to suggest that commuters in western and south-western Sydney are among those least able to afford such a substantial rise in travel costs. Average incomes in western Sydney are well below the Australian average,²⁶ with some of the lowest average incomes in the country to be found along the WestConnex route.

Figure 11. Income by postcode 2013/14



Source: Healthstats NSW and WSU

Above: Income by postcode in greater Sydney. For map source, see footnote 10.

²⁵ <http://www.parramattasun.com.au/story/4480053/new-fees-to-take-their-toll/>

²⁶ Committee for Sydney, *Adding to the Dividend, Ending the Divide #3*, January 2017.



In addition, the poor state of public transport in many parts of western Sydney means that many residents have no choice but to use the road network. In effect, the tolls charged on roads like WestConnex amount to a tax on car dependency among people with few, if any other options - and an outright poverty tax on those who are already scraping by on some of the country's lowest household incomes.

WAG was recently contacted by Dannielle, who lives in the Blue Mountains with her husband. While her story is just one case, the situation she now faces is shared by many commuters in western Sydney, who now face a choice between unaffordable tolls or even slower journeys to work on "rat runs":

"Six years ago, my husband and I decided that if we wanted to own our own home, have a family, and be able to save some money we would need to leave Sydney behind.

This was no small decision. We lived two minutes from my husband's place of work as a professional driver in the inner west, and I was still recovering from a head-on collision two years earlier, so we would be leaving my treatment providers as well.

But we couldn't afford to pay \$650 a week in rent plus expenses, and we were sick of being in share accommodation in our forties. We wanted our own space. Something had to give.

We began researching the options before us, and as we had a tiny budget that wouldn't even buy a studio apartment in Sydney, we decided the Blue Mountains would be ideal to start our life together in our first home. As luck would have it, we bought just before the Great Western Highway upgrade was finished about 18 months later, and so scored a doer-upper in the upper mountains. Anything closer to the city was out of our price range, or needed serious amounts of work we couldn't afford or didn't have the time to do.

The biggest change moving out of Sydney created was my husband could no longer work split shifts, meaning he took a serious cut in income. It simply wasn't feasible to drive two hours to work, work five hours, potentially have a four-hour break in the middle of the day, work a further five hours, and then face a two hour



drive home. He is contracted to 'manage his fatigue' as a professional driver, and he would have been below the required minimum sleep time.

For the last six years, he spends 14 to 16 hours a day away from home, and we have been scraping by. On his days off, he does what he can on his motorcycle to keep it running well so he can get to work, and fixing small things on our ridiculously long list of house repairs. He is now in his fifties, and our dream of having a family is pretty much gone, as we cannot afford fertility treatment.

When we heard that WestCONnex was going to happen, both of us became very concerned. Employment opportunities in the mountains are very limited, and factor in age, his only option is to retain his current job.

But we have so many questions. And like so many people across Sydney, we are still waiting for answers.

What will the roadworks do to the already long hours spent commuting?

Where is all the traffic going to go, as WestCONnex basically creates a funnel that will worsen the traffic on an already congested road?

How bad will traffic and expenses get if the Western Sydney Airport at Badgerys Creek also goes through?

How much would the return of tolls to the M4 affect our already limited budget?

According to the WestCONnex website, tolls will be at least \$6.74 for the complete length of the M4 from Parramatta to Haberfield when the M4 East opens. For us, and many other people who commute from the Blue Mountains into the inner Sydney area, that equates to \$13.48 a day for a return trip, or \$3,882.24 a year for someone working 6 days a week for 48 weeks.



PROJECT	OPEN TO TRAFFIC	SECTION	MAXIMUM TOLL*	TRAFFIC PER DAY IN 2031**
M4 Widening	2017	Parramatta (Church Street) to Homebush (Homebush Bay Drive)	\$4.21	163,800
M4 East	2019	Homebush (Homebush Bay Drive) to Haberfield (Parramatta Road and City West Link)	\$3.65	132,400
New M5	2019	Beverly Hills (King Georges Road) to St Peters (St Peters Interchange)	\$5.72	37,200
M5 East	2019	Beverly Hills to General Holmes Drive	\$5.71	49,300
M4-M5 Link	2023	Haberfield to St Peters	\$6.01	105,000

All tolls include 'flagfall' of \$1.12 and all amounts are in 2015 dollars. Maximum toll for WestConnex M4 (Parramatta to Haberfield) = \$6.74. Maximum capped toll for entire WestConnex = \$7.95. *Source: Table 9.2, WestConnex Updated Strategic Business Case – November 2015 **Source: Table 10.1, WestConnex Updated Strategic Business Case – November 2015 (forecast average weekday traffic volumes – includes both directions)

Above: WestCONnex tolls as published on the WestCONnex website.²⁷

These prices aren't set in stone, and I have no doubt, given historical practices of Liberal governments in the past, that the toll prices quoted will increase.

Unlike politicians, we can't claim travel expenses. We can't rent a pied-à-terre in Sydney for the week, and have that rent and other living expenses subsidised. We can't retire early and receive a pension for life most could only dream of.

WestCONnex is a CON. It's a blight on a once-great city. Its sole purpose is to ensure inflated property prices in the Eastern Suburbs, North Shore and Northern Beaches, and just another tax on people already doing the best they can in an increasingly expensive Australia, while giving Liberal developer 'mates' free rein on destroying our communities for profit."

4.0 Conclusion

WAG calls for a thorough, public, and wide-ranging review of plans for an ever-growing network of tollways throughout Sydney, with a view to making serious changes that will bring much-needed transparency to the processes by which these toll roads are planned, built, sold and operated.

²⁷ <https://www.westconnex.com.au/using-westconnex/tolls>



These changes should also make the public benefit - including comprehensive and fully costed assessments of alternatives to tolled roads, including public and active transport - central to the equation. Otherwise, NSW will continue to see extraordinary power over the mobility, liveability and sustainability of our state increasingly placed in the hands of private operators - and arrangement that disadvantages us all, and especially those communities that will be increasingly locked into expensive, unhealthy and unsustainable car dependency.

End of submission