

Submission  
No 448

**INQUIRY INTO IMPACT OF THE WESTCONNEX  
PROJECT**

**Name:** Name suppressed

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Partially  
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# Submission to the Inquiry into the impact of the WestConnex Project

Thank you for providing a formal opportunity to give feedback on the WestConnex Project. I appreciate we need transport options as travelling especially in peak time is difficult, but the WestConnex business case underestimates costs and hides the reliance of other large infrastructure projects to realise benefits and effective operation of the WestConnex roads.

There are **seven keys areas that require significant clarity** to ensure we understand the full impact of the WestConnex project, especially the Rozelle Interchange. I will expand on each point below.

- (a) The adequacy of the business case for WestConnex is significantly flawed in regard to determining the benefit:cost ratio (BCR) of the project:
1. **Travel time benefit over-estimated**
  2. **Accident crash rate under-estimated**
  3. **Emissions and Environmental Externality benefits over-estimated**
  4. **Travel time benefit biased against Inner West Locals**
  5. **Decline in home values and rental income not included**
  6. **Rozelle Interchange cost/benefit unknown**
- (f) The relationship between WestConnex and other toll road projects including the Sydney Gateway, Western Harbour Tunnel, F6 and Beaches link
7. **WestConnex outcomes are dependent upon the high cost/risk Western Harbour Tunnel**

## 1. Business case: Travel time benefit over-estimated

- **Increased traffic congestion on Anzac bridge and in the Rozelle Interchange tunnels from off-ramp opening** –The EIS indicates the Rozelle Interchange off-ramps are open immediately after construction, this has been confirmed by the M4-M5 Link project team. The Business case travel calculation assumed Rozelle Interchange off-ramps were not open until a Western Harbour Tunnel was operational<sup>1</sup>. Based on the 2015 business case traffic model this will result in an additional ~40,000 weekday trips on the Anzac bridge compared to 'Do Minimum' 2031 case, not ~20,000 trips as used for the benefit calculations (closed off-ramps). Hence trip times will take longer than in the business case.
- **Increased congestion on Anzac bridge and in the Rozelle Interchange tunnels from the removal of Camperdown Interchange** – The business case benefit traffic modelling included on and off ramps at Camperdown, this has now been removed. This will increase congestion on surface roads and potentially traffic volumes entering and leaving the Rozelle Interchange, again reducing the travel time benefits including the business case.
- **Increased congestion without the Sydney Gateway** – The business case benefit modelling including the Sydney Gateway to the airport and the ports, this has now been removed. This will also increase congestion on surface roads, making journeys longer.

- **Increased trucks and traffic around White Bay and Bays Precinct from industry and construction** – The business case benefit traffic modelling assuming no change in truck traffic around the Anzac bridge or Victoria Road. A leaked report from the State Government indicated that at the peak with the change in industry and construction at White Bay there may be up to 4,200 trucks on the road in this area per day<sup>2</sup>. This will impact the efficient operation of the Rozelle Interchange (increased traffic and traffic light disruptions from James Cook Drive).

#### **IMPLICATION FOR BUSINESS CASE: LOWER USER BENEFITS**

The 2015 Business Case User benefits of time travel, Vehicle Operating Costs and Travel Time reliability are all over-stated. The 'User benefits' make up approximately 80% of the total benefit from the WestConnex - given the significant change in assumptions, which clearly challenges the realisation of these benefits, the 2015 business case is surely invalid.

## **2. Business case: Accident crash rate under-estimated**

- **Increased accident risk on Anzac bridge with a 3 lane change in 1km** – The largest lane crossing currently required on the Anzac bridge to get into the correct exit lane travelling east is from the City West Link travelling to the Cross City tunnel. This is a one lane change over approximate 2 km. The proposed changes to the east connection onto the Anzac from Victoria Road, would require someone travelling to the Fish market exit to cross 3 lanes in less than 1km, merging with flowing tunnel traffic, whilst most cars exiting the tunnel from the outside lane are working to merge into the mid lanes<sup>3</sup>. Currently this is a one lane crossing. This is likely to significantly increase the risk of accidents.
- **Increased time delay from more accidents** – Any accident or breakdown in the inside two lanes will impact all traffic from Balmain, Rozelle, most of Glebe, Annandale and Leichhardt as they cannot access the 3 onramp lanes from the WestConnex.

#### **IMPLICATIONS FOR BUSINESS CASE: LOWER CRASH COST SAVINGS**

The business case Crash Cost Savings are unlikely to have taken into account the accidents from re routing traffic onto the Anzac bridge as they appear to be based on historical data in the traffic model, not the planned flow.

## **3. Business case: Emissions and Environmental Externality benefits over-estimated**

- **More air pollution from longer travel times:** The business case indicates more traffic on the road, longer travel length but positive environmental impacts due to faster average travelling speeds. However, given the overestimation of travel times/speeds (refer to point 1) this benefit will no longer be as large as expected. And, one may still question if you can have more cars on the road, driving longer distances and still get reduced emissions.
- **More truck pollution:** The business case does not include more trucks on the Anzac bridge or Victoria Road area, yet government reports suggest a 9 fold increase<sup>2</sup>, which will impact air and noise pollution

- **Cost of ‘concentrated’ pollution:** Construction of major motorways and tunnels that concentrate air pollution in high-density urban areas will likely increase health risks in those locations. 2.5 micron emissions pose significant risks to human health including lung cancer, heart attack, stroke and asthma<sup>4</sup>. Concentration levels in Sydney already indicate current air pollution levels are the equivalent to 0.36 cigarettes per day for every adult and child<sup>5</sup>. Rozelle is seeing four new ventilation outlets that will concentrate air pollution in this area. Who knows how many cigarettes per day this will be equivalent to?
- **More shipping and construction pollution** – expanded operations of White Bay to aid the construction of WestConnex and the Western Harbour tunnel will further increase air pollution, particularly in the Inner West - 24x7 port facilities, expanded cement works with (1,930 heavy truck movements a day<sup>6</sup>), marshalling and parking areas (568 heavy vehicle movements and 200 light vehicles per day<sup>7</sup>) plus pollution from the removal and drying of toxic sediment. I have included the Western Harbour tunnel pollution since this appears to be a prerequisite for the WestConnex to operate successfully (refer point 7).

**IMPLICATION FOR BUSINESS CASE: HIGHER ENVIRONMENT COSTS**

The business case Greenhouse Gas emissions and Environment externality benefit calculation is likely to be overstated.

**4. Business case: travel time benefit biased against Inner West Locals**

- **No consideration for high frequency Inner West local travellers** – The User Benefit traffic model appears to be based on individual trip calculations. For a local resident near an Interchange, eg Balmain, Rozelle, Glebe, they are likely to use the Anzac Bridge more frequently, maybe 3 to 4 times a day, hence incurring a cumulative total delay as large as a single trip benefit for someone travelling to/from Penrith given the revised EIS construction plan.
- **Increased ‘peak-spreading’ of congestion/delays impact Inner West locals** –the 2015 business case traffic report indicates ‘peak-traffic spreading’<sup>1</sup>, which will impact Rozelle Interchange and Victoria Road local residents again further extending their travel time, increasing the cumulative total delays for high frequency travellers.
- **Inner West locals unable to delay trips for ‘peak-spreading’** – The 2015 business case traffic report suggests travellers will delay trips due to congestion, however for Inner West locals may have fixed times to get to locations such as schools and cannot ‘delay’ trips on their local roads which include major congested intersections or roads due to the WestConnex.
- **Increased delays with more ‘lane merges’ required** – another delay for Inner West local residents will be caused by the proposed new eastern connection from Victoria Road and City West Link to the Anzac bridge<sup>3</sup>. In the new proposed design there will be two merges that occur from each road when accessing to the Anzac bridge. Currently both roads access the Anzac bridge without the need to merge lanes. This will be required in peak/non-peak and during construction. All again adding to the daily cumulative total travel time.

**IMPLICATION FOR BUSINESS CASE: BIASED USER BENEFIT COST CALCULATION**

The 2015 Business Case User benefits of time travel calculation is based on assumptions that are not appropriate for high frequency Inner West local travellers and underestimate the negative impact on their travel time, costs and travel time reliability.

**5. Business case: Decline in home value and rental income not included**

- **Decline in property prices near a planned WestConnex site** - Anyone who owns a property near a WestConnex site and tries to sell it will likely face a reduction in value.
- **Decline in rental incomes** - Anyone who has a rental property near White Bay, a WestConnex construction or ventilation stack is likely to experience a rent income decrease either through having to offer a more competitive rent to get tenants or have more unoccupied time.
- **Incurring additional stamp duty for anyone who wants to move out of the area due to WestConnex** – anyone who wants to move out of the area due to the broad impacts of WestConnex will face the costs of selling their home and most importantly paying stamp duty on buying a new one in another area. In essence, residents will need to pay stamp duty to the very same State government that has forced them to move out.

**IMPLICATION FOR BUSINESS CASE: COSTS NOT INCLUDED IN BUSINESS CASE**

The business case does not appear to make any allowance for income/asset value erosion for locals around key construction, Interchange or WestConnex related congested locations.

**6. Business case: Rozelle Interchange cost/benefit unknown**

- **Ability to assess impact of Rozelle Interchange without finalised plan** – no resident of Sydney is able to build a house or do major renovations without a plan being approved first so that impacts can be assessed. The State Government should have to abide by the same rules so that the full impact of the WestConnex can be established, especially when this section of the infrastructure leads to an already highly congested area with no clear solution. The final design will determine the realised benefits and costs to all on the roads.

**IMPLICATION FOR BUSINESS CASE: UNKNOWN COST/BENEFIT INCLUDED**

The business case cost/benefit assumptions for the Rozelle Interchange cannot be accurately estimated if they do know if/how this will be built.

**7. Connected projects: WestConnex outcomes are dependent upon the high cost/risk Western Harbour Tunnel**

- **2015 business case has Rozelle Interchange off-ramps closed until a Western Harbour Tunnel is operational**: The 2015 business case states that the Rozelle Interchange off-ramps onto the Anzac bridge should not be opened until the Western Harbour Tunnel is

operational as that would create an additional 20,000 trips (40,000 in total above the 'do minimum 2031 case) and create extreme congestion on the Anzac Bridge and queuing in the Interchange tunnels <sup>1</sup>.

- **EIS has the Rozelle Interchange off-ramps open immediately** – The EIS has the Rozelle Interchange off-ramps operational immediately after construction. This was confirmed by an email conversation with the M4-M5 project team – that the Rozelle Interchange off-ramp opening is no longer conditional on the Western Harbour Tunnel being operational.
- **EIS hides Anzac bridge data** – The Anzac bridge plays a critical role in the WestConnex Rozelle Interchange effectiveness, yet there is no AM, PM or daily Anzac bridge data in the EIS to compare volume assumptions with the business case<sup>9</sup>. The EIS modelling of the Rozelle Interchange shows traffic increase in 2023 and 2033 'with project'. The 2033 traffic analysis shows slight performance improvements over 2023 but yet the bottleneck of the Anzac bridge has not changed, how is that possible (Table 8-84)? (And, this scenario does not including a Western Harbour Tunnel).
- **More traffic at the Anzac bridge than the 40,000 extra trips in the 2015 traffic model** – Recent developments and plans for White Bay and the Bays Precinct suggest even more traffic around the Anzac Bridge than would have been projected in 2015 estimates.
- **How will all the traffic at the Anzac bridge move**– there does not appear to be a clear solution in the EIS as to what happens with all this additional traffic at the Anzac bridge. It does not appear to address how now those extra 20,000 vehicles, that were going to cause excess congestion and queuing in the 2015 business case, suddenly travel freely. The EIS does indicate 'unreleased' traffic almost doubles in 2023 'with project' compared to 'without project'... ah... those people just stay home?
- **The Western Harbour Tunnel will not fully resolve the Anzac bridge bottle neck** – EIS commentary indicates that even with the 'Cumulative Projects' of the Western Harbour Tunnel (2023 cumulative) there will be significant congestion on the Anzac bridge from the WestConnex 'However, without mitigation, queueing from the Bathurst Street exit ramp is forecast to remain an issue and is likely to extend up the exit ramp and impact eastbound flow on the Western Distributor and Anzac Bridge.'<sup>8</sup>
- **The approval of WestConnex stage 3b Rozelle interchange risks committing future governments to the completion of the West Harbour Tunnel** - The design and construction of the phase 3B Rozelle interchange risks creating a sunk cost investment that will commit future governments to undertaking the West Harbour tunnel. Anzac bridge congestion will put further pressure on future governments as well as toll road operators to find solutions (such as the West Harbour Tunnel) to this newly created problem.

**IMPLICATION– WESTERN HARBOUR TUNNEL COSTS AND RISKS SHOULD HAVE BEEN CONSIDERED AS PART OF THE BUSINESS CASE AT STAGE 3 APPROVAL**

The WestConnex Rozelle Interchange will not be effective without a Western Harbour Tunnel. Therefore the WestConnex Stage 3B project should not be reviewed or approved in isolation of a Western Harbour Tunnel project. The full impacts of both projects on the Rozelle Interchange and surrounding areas should be considered and reviewed jointly.

If the projects are considered concurrently the Rozelle Interchange residents will almost be forced to accept a Western Harbour tunnel since the traffic conditions from the Rozelle Interchange/Anzac bridge will cause such a significant bottle neck in their local area. This is likely to result in another significant infrastructure project that brings with it high environmental risks in it's current form<sup>9</sup> and does not fully solve the excess traffic problem created by the WestConnex.

I hope that given the issues outlined the Enquiry will recommend:

- (a) Work on the Rozelle Interchange be postponed until these issues have been resolved and,
- (b) Stop the sale of the WestConnex until these issues are resolved so as to ensure appropriate actions can be taken for local residents. A private organisation that benefits from higher volumes of traffic on toll roads, will not act to protect the interests of Inner West locals like a government should.

Thank you again, for the opportunity to provide this submission.

## References

- 1 WestConnex Updated Strategic Business Case – Technical paper 1 Traffic report, November 2015  
<https://www.westconnex.com.au/sites/default/files/Tech%20Paper%201%20-%20Traffic%20report%20Final.pdf>
- 2 Trucks to skyrocket in Sydney's inner west due to transport projects – Sydney Morning Herald 17 August 2018  
<https://www.smh.com.au/national/nsw/trucks-westconnex-documents-traffic-congestion-transport-20180812-p4zx18.html>
- 3 WestConnex M4-M5 Link EIS, Section 5
- 4 Dr Ray Nassar's "Health Effects of Air Pollution"
- 5 <http://www.abc.net.au/news/2018-08-16/chart-of-the-day-air-quality/10123238>
- 6 NSW Government Planning and Environment Major Project Assessment Concrete Batching Plant, Glebe Island  
[http://majorprojects.planning.nsw.gov.au/index.pl?action=view\\_job&job\\_id=8544](http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8544)
- 7 WestConnex Preferred Infrastructure Report  
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- 8 WestConnex M4-M5 Link EIS, Section 8 (page 8-153)
- 9 Western Harbour tollway: What makes up the toxic sediment in Sydney Harbour  
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