

Submission
No 465

INQUIRY INTO IMPACT OF THE WESTERN HARBOUR TUNNEL AND BEACHES LINK

Organisation: Action for Public Transport (NSW) Inc

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P O Box K606
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18 June 2021

Secretary
Public Works Committee
Legislative Council
Parliament House
Macquarie St
Sydney 2000

Dear Secretary,

Public Works Committee Inquiry into impact of Western Harbour Tunnel and Beaches Link Project

Submission

Action for Public Transport (NSW) Inc. is a transport advocacy group which has been active in Sydney since 1974. We promote the interests of beneficiaries of public transport - passengers and the wider community alike.

This submission is organised in sections corresponding to your terms of reference.

a. the adequacy of the business case for the project, including the cost benefits ratio

According to the Sun-Herald of 4 November 2018: *Michelle Zeibots, the research director of the Transport Research Centre at the University of Technology Sydney, criticised the NSW government's promise to build the Western Harbour Tunnel and Beaches Link, at an estimated cost of \$14 billion, describing the business case as "poor".*

Interestingly, on 17 June 2021 the NSW Auditor-General published a performance audit on Westconnex, finding that about \$4 billion of construction costs were excluded, resulting in an understatement of costs by that amount. Obviously the present projects should be examined for evidence of similar under-reporting.

In particular, it is evident that the changes to the Crescent overpass arrangements were 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. This is apparent from Table 4-1, in which complying with the Minister's approval is described as "Option 1":

... 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.

The cost of the "additional works" might or might not be included in the BCA.

b. the adequacy of the consideration of alternative options

It should be understood that the alternatives considered in State projects are always limited to those perceived as consistent with the stated aims of the project(s). By confining the aims, otherwise worthwhile alternatives can be and are excluded.

In this case, the outstanding precluded option was public transport development. Even though there is supposed to be a State policy of developing public transport (at least, the 2012 Master Plan said so) the objective of this project is to facilitate road trips along an axis joining about Brookvale and a Westconnex interchange at Rozelle.

It is not generally recognised that longer trips and shorter trips are qualitatively different. In the case of rail, shorter trips are best catered for with trains whose stops are close together e.g. the Paris metro averages only 700 metres between stops. The trains need to accelerate and brake quite hard but do not require a high average speed because their typical passenger is only travelling 5 or 10 kilometres. Longer-distance train trips are best served with faster trains fitted with plenty of seats.

Returning to road trips, the typical motorway is designed with longer trips in mind. Access points to motorways are at least 2km apart so that drivers don't need to change lanes at short notice. Speed limits are high - 90km/h or more. Contrast this with a road like Canterbury Road with several intersections every kilometre and so many traffic signals that average speeds can be as low as 30km/h. So Canterbury Road is better suited for short trips even though it carries thousands of longer trips.

Western Harbour Tunnel and Beaches Link are clearly intended to facilitate long road trips. That aim precluded any real consideration of projects such as a metro railway connecting Chatswood and Brookvale.

c. the cost of the project, including the reasons for overruns

We have no comment on this section

d. the consideration of the governance and structure of the project including the use of a 'development partner' model

We have no comment on this section

e. the extent to which the project is meeting the original goals of the project

The stated goal of the project is likely to be reduced traffic congestion. Given the lack of success of previous motorways as a method of reducing congestion and improving travel times, it is not sensible to expect a different result in the case of the Western Harbour Tunnel and Beaches Link.

f. the consultation methods and effectiveness, both with affected communities and stakeholders

We have no comment on this section

g. the extent to which changes in population growth, work and travel patterns due to the Covid-19 pandemic have impacted on the original cost benefit ratio

We have no comment on this section

h. whether the NSW Government should publish the base-case financial model and benefit cost ratio for the project and its component parts

Of course these should be published for such projects but too often they're not. Instead, some thin story is given about the business case being "commercial in confidence". Or a sketchy case is given with a meaningless (but favourable) BCR.

i. whether the project is subject to the appropriate levels of transparency and accountability that would be expected of a project delivered by a public sector body

A 2014 NSW Audit Office report (NSW Auditor-General's Report to Parliament - Westconnex: Assurance to the Government) notes (p.15) that the Westconnex project began with the NSW Government asking Infrastructure NSW (established mid-2011) to provide advice on "Sydney's next motorway priority" as part of its work in developing the State Infrastructure Strategy (SIS). Exactly when and how this request was made is not indicated in the report. Nor is it clear why the request was made, presuming as it does the need for a motorway at all.

The reason may be the one alluded to in a March 2012 report (National Infrastructure Coordinator March 2012 Report to Minister for Infrastructure on Private Financing Options for Upgrades in Sydney's M5 and F3-M2 Corridors) by the National Infrastructure Co-Coordinator, which stated (p.29) "There have been suggestions that Transurban may present an unsolicited proposal to the NSW Government to develop several motorway links".

The opaque "unsolicited proposals" process that delivered the Westconnex proposal then produced the "Western Harbour Tunnel and Beaches Link".

The proposal has now leapt straight from a "scoping" paper in 2017 to an EIS in 2019. At no point has the proposal been the subject of a proper process of strategic justification.

Although the EIS deals with the Western Harbour Tunnel and Warringah Freeway Upgrade, there is frequent reference to Beaches Link and it is seen as "an integrated program of works known as the Western Harbour Tunnel and Beaches Link program" (Chapter 3 p.3-9).

We note tolling facilities are to be built in, indicating sale to a toll operator. It is easy to see why a tollway connecting a high-income area to the established CBD and the airport would be an attractive proposition for a tollway operator. How and why the proposition would get this far without proper, open assessment is a mystery worthy of investigation.

j. the impact on the environment, including marine ecosystems

The project is utterly at odds with the State's integrated transport and land use plans, and with its stated intention to transition to net zero emissions by 2050. An aspirational target in the State's Climate Change Policy Framework, zero net emissions by 2050, is intended to "set NSW up as a leading and competitive low-carbon economy".

The urgency of the endeavour grows clearer with every passing day, and yet motorway expansions roll on regardless. Given that *emissions from transport are second only to energy production*, this is both incomprehensible and reprehensible.

The EIS for the project skated over the increase in VKT (vehicle kilometres travelled) clearly predicted in the climate change and green house gas calculations set out in the accompanying report. The "justification" for proceeding regardless rests entirely on the proposition (Jacobs p.40) that "greater volume of traffic which is able to flow more freely, but at an improved fuel efficiency".

This is a spurious proposition because the "free flow" of traffic it assumes will dissipate quickly as induced traffic counteracts the short-lived impact of increasing road space. The Westconnex New M5 Project Overview contains empirical evidence that this is exactly what should be expected. It notes (p.9) that the "old" M5 was congested within just six months of its opening in 2001, and now experiences the slowest typical travel speeds of any of Sydney's main motorways (Westconnex: the New M5 Project Overview p.9).

We note that the Minister for Transport supports electrification of the vehicle fleet as a means of addressing this existential threat. We welcome his commitment to introducing electric buses to the public transport fleet.

Realistically, though, the uptake of electric vehicles in Australia is painfully slow and it will be many years before petrol and diesel fuelled private vehicles are removed from the roads. Unless and until that happens, motorways are part of the greenhouse problem, and form no part of the solution.

k. the adequacy of processes for accessing and responding to noise, vibration and other impacts on residents, during construction and operationally

We have no comment on this section

l. the impact of the project on nearby public sites, including Yurulbin Point and Dawn Fraser Baths

We have no comment on this section

m. any other related matter

The likely results of completing this project will be an increase in road traffic everywhere on the Warringah peninsula. During the summer, parking around beaches (already at intolerable levels) will become even more difficult.

An indirect result of spending so much on road expansion to the northern beaches will be setting back public transport development, partly because funds for capital works in the region will be depleted and partly because facilitating long car trips will bake-in car-dependent land uses and travel habits.

The northern beaches peninsula used to be a place to go for recreation or retirement. The increase in car numbers will eventually submerge it in a sea of traffic emanating from the Westconnex motorway juggernaut.

Jim Donovan
Secretary
Action for Public Transport (NSW) Inc.