

## INQUIRY INTO IMPACT OF THE ROZELLE INTERCHANGE

**Organisation:** Transport Workers' Union of NSW

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**Submission**

***Inquiry into the impact of the Rozelle Interchange***

*21/03/2024*

**Transport Workers' Union of New South Wales**

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## 1. About the TWU

- 1.1 The Transport Workers' Union of New South Wales (TWU) represents tens of thousands of people in Australia's road transport, aviation, oil, waste management, gas, passenger vehicle and freight logistics industries.
- 1.2 With over one hundred (100) years' experience representing the workers who conduct Australia's crucial passenger and freight transport tasks, the TWU has been proactive in advocating for the establishment and improvement of industry standards which advance the lives and safety of transport workers, their families and the community at large.

## 2. Introduction

- 2.1 The TWU welcomes the opportunity to contribute to the '*Inquiry into the impact of the Rozelle Interchange*'.
- 2.2 The essential workers conducting New South Wales' critical transport task use the roads every single day. By virtue of a long-standing representational history of workers in the transport industry, the TWU is uniquely positioned to comment on the relevant impacts of the Rozelle Interchange.
- 2.3 Regarding the terms of reference, the TWU will address multiple points, and will also provide some insight into how the Rozelle Interchange has impacted heavy vehicles, and the thoughts of heavy vehicle drivers themselves. The conclusion of this submission will contain a summary of the TWU's recommendations to the inquiry.

## 3. The Rozelle Interchange's impact on Traffic Flow and Heavy Vehicles

- 3.1 Up to the present moment, the Rozelle Interchange has been the subject of significant scrutiny in the public eye for various reasons. Amongst these reasons, the most notable may be the Interchange's undeniable impacts on traffic flow.
- 3.2 The first few days following the Interchange's opening were arguably the most tumultuous. Amongst the chaos, John Graham, the Minister for Roads of NSW, announced that large trucks from the Western Harbour Tunnel and Sydney Metro dig site projects respectively would be diverted from the area. Specifically, the trucks would be forbidden from using the area throughout the morning peak<sup>1</sup>.
- 3.3 Further, the Minister commented;

*"... they've (trucks) been mixing it with commuter traffic in the peak hour and that's one of the things that has made it worse."*

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<sup>1</sup> Minister accepts Sydney motorists frustrated by new interchange as Rebel Wilson vents about delays. (2023). ABC News. [online] 29 Nov. Available at: <https://www.abc.net.au/news/2023-11-29/nsw-rozelle-interchange-rebel-wilson-trucks/103167510>



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- 3.4 Though the abovementioned comment stands in reference to the heavy vehicles working on the specified Government projects, the underlying reality for heavy vehicles using the new Interchange is one that is primarily detrimental, but requires proper context to understand.
- 3.5 Sydney has uncomfortably reached a point of undeniable toll road saturation, and the pricing of tolls has a disproportionately adverse effect on heavy vehicle drivers. Aside from the excessive point-to-point charging itself, part of the issue lies in the lack of a toll charge cap for heavy vehicles on most toll roads (currently, WestConnex has a maximum toll cap for heavy vehicles, being \$35.33 per journey), or a lack of sufficient relief in general. Many TWU owner driver members cite toll road costs as one of their primary 'cost of living' contributors and concerns.
- 3.6 Historically speaking, the TWU has been vocal in its support of toll relief initiatives for heavy vehicle drivers. Much of this comes from the TWU's representation of, and engagement with, owner drivers and contract carriers, as well as transport operators themselves.
- 3.7 Though the arrangement of the Rozelle Interchange allows for toll free use of the city-bound lanes, it does effectively funnel vehicles onto the tolled M8, as well as the M4. It also connects to the City West Link, and the future Western Harbour Tunnel will also be linked to the Interchange.
- 3.8 The cost of tolls, as well as confusing signage are key contributing factors towards the traffic flow issues experienced as a result of the Rozelle Interchange's congestion issue. However, there are fundamental issues that are deeply rooted in Sydney's traffic culture that need to be addressed as well, if any meaningful improvements are to be made.
- 3.9 Specifically, a high level of vehicle dependency is a key contributing factor to the congestion issues from the Interchange, in conjunction with other elements. High-vehicle dependency is something that can be tackled through long-term efforts, and the TWU will make recommendations further within this submission.
- 3.10 Following the congested launch of the Rozelle Interchange, Howard Collins, Chief Operations Officer of Transport for NSW, exclaimed that;
- "... It goes from ten lanes into four (city bound approach to the Anzac Bridge) ... We used to have seven lanes into four."*<sup>2</sup>
- 3.11 The TWU questions how such an eventuality was not marked as a potentially serious issue in the development of the Rozelle Interchange and the broader WestConnex project, by the former Liberal Government, as introducing a total of three more lanes on top of seven, to merge into just four, would very obviously serve to bottleneck the road, and would logically be an antithesis to the "intended" purpose of these infrastructure projects to begin with.

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<sup>2</sup> Sydney's multi-billion-dollar roadway with choke points designers didn't see coming. (2023). ABC News. [online] 30 Nov. Available at: <https://www.abc.net.au/news/2023-12-01/rozelle-interchange-explainer-first-week-congestion/103172454>.



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- 3.12 It should also be mentioned that toll road costs begin to lose any form of justification for the user if their journey is, at the very least, seeing no real benefit in terms of time-saving or convenience. Effectively, charging tolls on these motorways, even when congestion is causing severe delays and inconvenience, is simply unreasonable and entirely inequitable.
- 3.13 Then, the solution for motorists becomes the phenomenon known as 'rat running', which describes the use of arterial roads rather than motorways, and is a term typically used for the description of heavy vehicles. However, the New South Wales Government has acknowledged rat running as an issue on Sydney's roads, and have made multiple public calls, including a tolling review, in a bid to address this.
- 3.14 In this specific case, motorists have been bypassing the M8 altogether, and when opting to use arterial surface roads, cause more congestion. Again, these ripple effects should have been properly forecasted by the Liberal government in the developmental stages of the Interchange and broader WestConnex project.
- 3.15 The TWU would urge the New South Wales Government to bear this in mind when attempting to incentivise the use of toll roads, and the new Rozelle Interchange. The cost of the roads has outweighed the benefit for motorists, and especially truck drivers, who pay a toll charge far beyond that of a normal passenger vehicle, with no broad cap on those charges either.
- 3.16 To further capitalize on the previously mentioned issue of tolling charges for heavy vehicle drivers, contract carriers and owner drivers in the transport industry are especially vulnerable to tolling charges, especially when giving consideration to the extent of which these charges are applied.
- 3.17 Richard Olsen, TWU NSW State Secretary, shares:
- "... on paper, toll roads should be serving as a faster route for heavy vehicles to take. But there are issues. Firstly, the cost of tolls for heavy vehicles is too high, and the compounding of these costs is simply too much for owner drivers and operators to absorb. Secondly, it's becoming increasingly common for the benefit of toll roads to, in practice, lose all meaning due to some manner of congestion.*
- The Rozelle Interchange has not helped these issues, and it won't help the rat-running practiced by heavy vehicles."*
- 3.18 It is necessary to consider the lived experience of heavy vehicle drivers that have been directly impacted by the opening of the Rozelle Interchange. The TWU has approached heavy vehicle drivers, including bus drivers, on their perspectives, in the hope that their voices are heard, considering they are directly influenced by the network on a daily basis.
- 3.19 Bus Driver and TWU NSW Delegate, Allen, shares his own experience, and that of his fellow drivers, since the opening of the Rozelle Interchange;

*"... our depot operates runs across arterial roads surrounding the Rozelle Interchange, and it has been chaos since the opening. The worst of it was certainly closer to the opening, but*



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even now, we (bus drivers) still face issues.

*There has been severe congestion around the City West Link, towards the Anzac Bridge into the city. There are two lanes from the City West Link that make up part of the four on the Anzac Bridge, and the services running that route were always late. With the opening of the Rozelle Interchange, how was this all supposed to function?*

*Even to this day, months following the Interchange's opening, a good 25% of those same runs are consistently late-running. Beyond the physical and practical mess, what frustrates myself, and others at the depot, is that we (bus drivers) were not consulted with whatsoever throughout the planning of the Rozelle Interchange. We are just expected to suck it up and deal with these consequences. Do the opinions of drivers, who use these roads every single day, not matter?*

*I don't know what can be done at this point. Diverting, or reducing traffic? I think the only way that can be done effectively is to incentivise alternatives to driving, and buses come to mind. Government should invest in us (buses) rather than new roads. Maybe talk to us for once too."*

- 3.20 Through further talks with TWU members, below are some comments and observations from drivers who frequently use WestConnex, The Anzac Bridge, and/or the Rozelle Interchange and surrounding arterial roads;

*"... the signage at the Interchange is horrible. I got lost in there. I'm no expert, but seems like poor design to me."*

*"... there are too many lanes inevitably trying to squeeze onto the Anzac Bridge... what the hell were they expecting? It's... you know, a physical impossibility to have all of that (traffic) route onto the (Anzac) bridge without problems."*

*"Use the other (arterial) roads where you can... bunch of other people had the same idea."*

- 3.21 In conjunction with observed comments from the general public, it appears that one of the common themes in complaint have to do with underlying design elements of the Interchange, such as signage, as well as broader factors, such as the amount of traffic lanes all ultimately merging together on the Anzac Bridge.

- 3.22 All in all, the impact on heavy vehicles seems to be quite notable. Bus services, in the timeframe of the Rozelle Interchange's opening, had been running late, and still are. Trucks, and other heavy vehicles will typically opt for the option of arterial roads, and are faced with further congestion, regardless of route. Though, the "rat-running" committed by heavy vehicle drivers can also be attributed to broader issues in the network, such as toll charges.

#### **4. The Purpose, Design and Developmental Elements of the Rozelle Interchange and Related Projects**

- 4.1 The intended purpose of the Rozelle Interchange has to be noted in context with related projects, such as the Western Harbour Tunnel and the broader WestConnex project. The New



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South Wales Liberal Government, at the time, promised to motorists that the Western Harbour Tunnel project would see significant levels of traffic reduction on the Sydney Harbour Bridge, Sydney Harbour Tunnel, Anzac Bridge and Western Distributor<sup>3</sup>.

- 4.2 Through assessment of the original project update<sup>4</sup>, it is apparent that the Western Harbour Tunnel may have been assumed to be in place once the Rozelle Interchange would open. This much can be concluded through a clearly observed over-reliance on the completion of the Western Harbour Tunnel in actually delivering any promised community and traffic benefits, in conjunction with the promised benefits of the Rozelle Interchange.
- 4.3 The TWU would wager to say that the traffic dilemma born from the opening of the Rozelle Interchange should have been forecasted by the Liberal Government from the onset. Even if the idea of internal assessment is to be ignored, it is not as if the Government's plans had been devoid of any criticism or external observation either; they had been advised for years that this overall project would simply relocate congestion and bottlenecks to other key gateways, such as the Anzac Bridge.
- 4.4 Moreover, the then Liberal Government had been advised by Transurban that the construction of the Western Harbour Tunnel would not be financially viable unless tolls on the Sydney Harbour Bridge and existing motorway tunnel rose significantly<sup>5</sup>.
- 4.5 Coupled with Transurban advising senior public servants in 2019 that the ACCC was of no concern in the provision of the Western Harbour Tunnel, as the "ACCC has no jurisdiction" over new motorways, as well as claiming the Western Harbour Tunnel was of "strategic importance" in Transurban's bid to "drive value" in WestConnex<sup>6</sup>, it is clear that the development of these large infrastructure projects is purely purposed to justify the increased size and cost of WestConnex – a project that somehow, bloated well beyond its original scope of merely functioning as an extension to the M4, and a link to the M5.
- 4.6 As such, the current lived situation of the Rozelle Interchange makes it difficult to accept the notion that the project was planned for tackling congestion. It may be more accurate to suggest that the Interchange serves as a vessel for funneling even greater sums of money to Transurban by forcing motorists onto toll roads.
- 4.7 Furthermore, WestConnex's financial underpinnings are subject to a conveniently appointed 40-year secrecy arrangement, in which the underlying details surrounding the project in this capacity is to remain strictly confidential, away from public eyes. Considering that WestConnex and all related projects, including the Western Harbour Tunnel and the Rozelle Interchange have consistently been marketed as beneficial for the motorists of Sydney, the TWU must wonder why there is such a high-level of secrecy in the finer details.

<sup>3</sup> NSW Government. 2020. *Western Harbour Tunnel and Warringah Freeway Upgrade*.

<sup>4</sup> NSW Government. 2018. *Western Harbour Tunnel – Project Update*.

<sup>5</sup> O'Sullivan, T.R., Matt (2022). *Sydney's new road tunnel 'unviable' without surge in Harbour Bridge tolls*. [online] The Sydney Morning Herald. Available at: <https://www.smh.com.au/national/nsw/sydney-s-new-road-tunnel-unviable-without-surge-in-harbour-bridge-tolls-20220216-p59x0i.html>.

<sup>6</sup> Ibid.





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- 4.8 If the projects in question are being delivered in good faith, and can truly be described as the solution to road-traffic, then a 40-year secrecy arrangement is certainly not an effective measure in relaying this to the public and gaining trust.
- 4.9 A video released by 7 News Australia on February 27, 2024 titled, *'Bombshell documents reveal the truth about Sydney's Rozelle Interchange'*, saw Natalie Ward, Shadow Minister for Transport and Roads, attempting to criticise the current New South Wales Labor government for the chaos of the Rozelle Interchange, as documents have emerged on specific details regarding the launch of the project.
- 4.10 Ultimately, the Rozelle Interchange remains a legacy of the previous government's failings. The underpinnings and finer details of the project, not to mention the contracts themselves, were all finalised in the station of the former New South Wales Liberal government. By the time Labor took government, the actual development of the Rozelle Interchange had reached the point of no return; a point where no meaningful changes could be applied to the project's underpinnings.
- 4.11 Therefore, a more accurate observation would be that the current Labor government has been left with no choice but to try and clean up the mess and deliver, and to pin the blame on this government is nothing short of a disingenuous attempt at trying to deflect the blame. From the project's inception, through to the flawed design and commitments, the fault lies entirely with the former New South Wales Liberal Government.
- 4.12 Separately, it is important to consider that, historically, but particularly in recent years, a multitude of studies have indicated that constructing more roads will simply bring about new traffic, by facilitating the use of cars for individual commuters<sup>7</sup>, and in major urban areas, may create more congestion, pollution and collisions<sup>8</sup>. To put it briefly, new roads can induce demand for private vehicles.
- 4.13 While the mere topic of road development may not seem like a big issue, it certainly is in isolation, and is made doubly so through contextual factors in relation to the WestConnex project, and related plans. It is common knowledge that the planning and development of motorways and new roads is a very complicated, multi-layered endeavor that requires absolute diligence and expertise in delivery. Though that needn't be said, the TWU would remind the inquiry that, as discussed, there is a common denominator in complaints about the Rozelle Interchange.
- 4.14 The TWU believes that it is safe to say that, so far, the advertised purpose of the Rozelle Interchange has not been achieved. From its opening, motorists have been suffering heavy congestion and delays, inconvenience through poorly planned signage and confusion within the tunnels. With such blatantly flawed design elements and traffic modelling, in conjunction with the previously discussed factors surrounding Transurban's past statements, and secrecy

<sup>7</sup> Chen, W. and Klaiber, H.A. (2020). Does road expansion induce traffic? An evaluation of Vehicle-Kilometers Traveled in China. *Journal of Environmental Economics and Management*, 104, p.102387.

<sup>8</sup> None Anupriya, Bansal, P. and Graham, D.J. (2023). Congestion in cities: Can road capacity expansions provide a solution? 174, pp.103726-103726.



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arrangements, it is challenging to agree with the idea that any of this was done with best practice in mind, and to deliver genuine practical value for motorists.

## 5. Communication and Consultation Undertaken by Transport for NSW

5.1 Disappointingly, there seems to have been a very limited level of consultation, if anything at all, on part of the NSW Liberal Government, and actual heavy vehicle drivers, throughout the developmental stages of the Rozelle Interchange, and other motorway projects. This is a common criticism of the WestConnex network that the TWU hears from its members.

5.2 It stands to reason that consulting with the intended users of a piece of infrastructure, particularly in what can be described as the most sensitive stage in a project's lifespan, would only prove to be beneficial. Heavy vehicle drivers, in their knowledge and road experience, would have been able to provide valuable feedback to the NSW Government on the design of the Interchange.

5.3 The NSW Government did release an animated video providing an early glimpse into the Interchange, and signage, for motorists to watch. This, however, does not change the reality of the Interchange; video or not, the design elements are still flawed, and nobody was consulted on those processes, seemingly out of a need to maintain a secrecy arrangement. In saying that "nobody" was consulted, that includes councils and local communities satelliting the Rozelle Interchange, users of the road, as well as relevant bodies capable of providing valuable insight

5.4 Suffice to say, based on comments from TWU members, as well as the general public, consultation could have been conducted to a far more effective manner throughout the different stages of the Rozelle Interchange project.

## 6. Solutions to Ease Congestion and Gridlock Attributed to the Rozelle Interchange and the Future Western Harbour Tunnel

6.1 Options aside from building more tolled motorways and tunnels should very seriously be considered in the bid to combat congestion. Of course, the TWU respects that the current situation won't allow for any meaningful changes to be made to existing infrastructure plans that were secured by the previous Government. However, what the current Government can ensure is that any future endeavours are very carefully considered, for the actual benefit of road users.

6.2 For reference, between 1986 to 1991, the Sydney Harbour Bridge enjoyed a relatively stable level of traffic volume, at roughly 180,000 vehicles per day. 1992 saw the Sydney Harbour Tunnel open, and in 1995, the volume of traffic crossing the harbour was close to 250,000 vehicles per day. Though this is a 38% increase in traffic, it cannot be attributed to population growth, which was a mere 4% throughout that period<sup>9</sup>.

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<sup>9</sup> R Mewton (2005). Induced traffic from the Sydney Harbour Tunnel and Gore Hill Freeway. *Road & Transport Research*, 14(3).



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- 6.3 What this means is that the increase in traffic flow in the aforementioned example can actually be attributed to induced demand. Once the Western Harbour Tunnel opens, the TWU is concerned that a similar phenomenon will occur.
- 6.4 The large infrastructure projects that have been committed to in Sydney, such as the upcoming Western Harbour Tunnel, as well as the new operational Rozelle Interchange, cannot be subject to any meaningful change or alterations in a developmental or structural capacity. Simply put, Sydney is now faced with a reality where these motorways exist, and therefore, approaches to easing congestion and gridlock must consider the resources available in all avenues beyond the road itself.
- 6.5 With that in mind, a practical recommendation towards easing overall congestion for the Rozelle Interchange, and associated roads, would be adequate and necessary investment towards the provision of public transport services, with specific emphasis on buses. Indeed, the NSW Government should invest in the resources Sydney already has, that are currently being under-appreciated, and therefore, cannot deliver a level of service that they otherwise would with the appropriate support.
- 6.6 The NSW Bus Taskforce has found that buses are significantly under-invested towards, in comparison to road infrastructure projects, such as the WestConnex, as well as other modes of public transport such as heavy rail and Metro development. Notably, the Taskforce's first report expresses that the fall of investment in buses is "particularly egregious", given that buses boast similar passenger movement to that of heavy rail<sup>10</sup>.
- 6.7 Among the plethora of studies done on traffic, induced demand, and the potential of public transport in combatting road congestion, many come to the conclusion that public transport can in fact reduce congestion. What has been suggested includes the idea that the ability for public transport to reduce congestion can be maximized if auto users were internalizing the full marginal social cost of their travel<sup>11</sup>.
- 6.8 Moreover, a recent review of traffic congestion relief associated with public transport determined that one of the key benefits of public transport is in fact the ability to relieve congestion. Additionally, it was proposed that road-based public transport, such as buses, could relieve traffic from alternative routes, which could deliver notable benefits for arterial roads<sup>12</sup>.
- 6.9 Considering that Sydney is a city that has built a lot of roads, alleviating traffic congestion is no easy task. In the context of Sydney, there may be a requirement for special conditions in the ability for buses to reduce road congestion. The TWU believes that, in the event the NSW Government conducts appropriate investment and enhancement into buses, there should be continual investment in provisions as patronage grows. Though, at the same time, the

<sup>10</sup> NSW Bus Industry Taskforce – First Report (2023). *Transport for NSW*.

<sup>11</sup> Beaudoin, J., Farzin, Y.H. and Lin Lawell, C.-Y. C. (2015). Public transit investment and sustainable transportation: A review of studies of transit's impact on traffic congestion and air quality. *Research in Transportation Economics*, [online] 52, pp.15-22.

<sup>12</sup> Nguyen-Phuoc, D.Q., Young, W., Currie, G. and De Gruyter, C. (2020). Traffic congestion relief associated with public transport: state-of-the-art. *Public Transport*, 12.



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Government should not cave into the idea of increasing road capacity, so as to not induce further demand for private vehicles.

- 6.10 Aside from studies and industry comments, a common perception that the TWU has observed from the general public in Sydney is that the public transport on offer is simply “not good enough” to provide meaningful incentive over private car use, which would further support the idea that public transport may prove to be a viable alternative to private commuting, providing that the quality of services is to a sufficient standard.
- 6.11 The provision of bus services should also be proactive, rather than reactive. Transport investment should be aligned with forecasts, to stay ahead of economic growth and related factors, as well as any population-based elements that may influence the demand for travel.
- 6.12 The TWU would highlight that, critically, bus drivers should not be at any disadvantage in the event of transport investment, or improvements to services. The best way to achieve this, and the aforementioned elements, is to engage in consistent consultation with experienced stakeholders, including the TWU.
- 6.13 The improvement of bus services in Sydney is a complicated undertaking. That said, the TWU would urge the NSW Government to not be discouraged in the face of such a task, and commit to meaningful discussion in moving forward, as band-aid solutions towards congestion will only go so far, and long-term solutions, although challenging in a temporal aspect, will prove far more beneficial down the line. The TWU would also point to the general recommendations raised by the NSW Bus Taskforce at the time of this submission.

## 7. **Conclusion and Summary of Recommendations**

7.1 The TWU would like to thank *Portfolio Committee No. 6 – Transport and the Arts* for facilitating this inquiry, as it is a necessary step forward following the opening of the Rozelle Interchange.

7.2 Below is a summary of the TWU’s recommendations for the inquiry:

- In a bid to relieve congestion over time, invest into the improvement and further development of existing, and entirely capable public transport, including buses.
- Ensure that buses are invested into adequately, in comparison to other modes of public transport, considering the level of passengers moved on a daily basis.
- Engage in consistent consultation with stakeholders, including the TWU, on the future development of buses. This is crucial in achieving a level of public transport that is of a “good enough” quality for Sydney.
- General consultation with the TWU, heavy vehicles drivers and other stakeholders on how Sydney’s motorways can be improved for heavy vehicles, with specific emphasis on current tolling schemes. This is especially important considering that “rat-running” provides more benefit for heavy vehicles than that of toll roads in many cases, when



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compared to cost.

- Very careful approach to any future ideas of motorway development, in specific reference to the phenomenon of induced demand.
- Reflection on the failings of the previous government; provide transparency when it comes to large-scale projects, and their underpinnings.