

Comments on WCC Draft EIS Submission

by

John Moratelli, CPA Committee Member

WCC Draft Submission	Ref	CPA Comment
<p>This project which is a motor vehicle focused infrastructure upgrade, pays scant regard to how public transport and active transport connections will be addressed and as such its contribution to achieving the strategic vision for Sydney contained in the Sydney Region Plan has to be seriously in question</p>	P3	<p>While true it is that the project pays scant regard to the matters mentioned it is insufficient, given the deleterious impacts of the project as currently proposed, to fail to mention that alternatives to the motorway (which would address the directions set out in the directions set out in the Greater Sydney Region and District Plans) aren't adequately considered, even though the SEARS requires alternatives to be considered. I discuss this in more detail in my comments below.</p> <p>The draft EIS also fails to mention that Willoughby's Local Strategic Planning Statement has a number of objectives inconsistent with the Beaches Link part of the project but consistent with improved public transport along the Warringah Road corridor to Chatswood namely:</p> <ul style="list-style-type: none">• Developing Chatswood's role as a true transport hub for Willoughby and the North Shore• Connecting Willoughby's network of centres with each other and with Greater Sydney by mass transit• Developing Chatswood as a key commercial centre and integral part of the Eastern Economic Corridor <p>This is a fundamental failure of the entire process which needs to be mentioned. North Sydney Council's submission deals with this far more adequately – See Annexure A</p>
<p>The overall community engagement approach by TfNSW (formerly RMS) has generally been appropriate for this phase of the project, however specific consultation with Willoughby City Council did not occur</p>	P3	<p>It is just not correct to say that the overall approach has been appropriate. School communities were given insufficient time to lodge submissions given the school holidays, the need to elect new P&Cs and then the COVID-19 crisis. Some relevant information in relation to harbour contamination was marked 'commercial in confidence' and not released. The business case for the project has not been released.</p>
<p>It is considered that the construction and operation of the Northern Beaches Link and Gore Hill Connection project should lead to minimal short term impacts on the existing traffic and transport system and ultimately provide a positive whole-of transport outcome for all users, in particular sustainable transport modes.</p>	P6	<p>It is difficult to see how this statement can be justified in light of other comments in the draft e.g. in relation to the destruction of Willoughby South local centre due to traffic impacts.</p> <p>It is particularly difficult to see how this statement can be justified in relation to the Beaches Link when the EIS hasn't even been released and significant concerns have been raised in relation to the congestion impacts of the work site on Flat Rock Drive due to the need to deal with high numbers of truck movements in and out of the site.</p>

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<p data-bbox="143 165 338 193"><u>Traffic Modelling</u></p> <p data-bbox="143 217 806 379">The three stage traffic modelling approach used is comprehensive and appropriate. Notwithstanding, there are a number of issues that need clarification so that Council has confidence in the models developed and their results:</p> <ol data-bbox="143 403 824 1145" style="list-style-type: none"> <li data-bbox="143 403 824 566">1. Do the models reflect the provision of the latest information on land use and transport provision such as the changes in land use anticipated in the Chatswood and St Leonards Strategic Centres as well as the local centres within Willoughby and within the North District. <li data-bbox="143 590 824 687">2. Do the models include all existing and new mass transit modes such as the Metro City and South West, B-Line, patronage levels and changes to transport mode splits. <li data-bbox="143 711 824 842">3. Clarification on the difference in traffic performance results of introducing a toll to the Sydney Harbour Bridge and Sydney Harbour Tunnel (the approach used in the EIS) as compared to the toll free situation (retain status quo). <li data-bbox="143 866 824 963">4. Clarification on why the forecast heavy vehicle volumes using the Sydney Harbour Bridge following the commissioning of the Tunnel are still high. <li data-bbox="143 987 824 1145">5. Clarification of the meaning of the network measures, as many of the performance indicators get worse with the project. How do any measures relate to the model operation and what are the implications for the model results provided in the EIS? 	<p data-bbox="857 165 925 193">P24</p>	<p data-bbox="952 165 2116 435">It is inappropriate to state that the traffic modelling approach is appropriate if the modelling itself is unreliable because public transport alternatives have not been considered. Specifically, in relation to point 2, the modelling has not taken into account the congestion impacts of the B line¹ and, even assuming that the Metro City and South West has been considered as part of the modelling, modelling in relation to uptake of public transport has consistently and grossly underestimated uptake². Further in relation to point 2, the modelling has not considered the additional impact of the proposed Sydney Metro West, the proposed B2 line along Warringah Road to Chatswood Station, or the synergistic effects of these various public transport projects taken together.</p> <p data-bbox="952 491 1323 518">1 See GIPA response – Annexure B</p> <p data-bbox="952 523 2000 582">2 Sydney Morning Herald article 19/2/20 "Public transport growth hurtles past NSW government predictions"</p>

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<p><u>Road Based Public Transport</u> Provide an efficient, reliable and safe 24/7 road based public transport link between Gore Hill Freeway and Sydney CBD at York Street:</p> <ul style="list-style-type: none"> • Extend and connect the 24/ 7 T2 Transit Lane on Gore Hill Freeway (eastbound) to the proposed southbound bus lane, west of Miller Street. • Provide a new 24/7 bus lane (northbound) from Sydney CBD (York Street) to at least Miller Street. • Provide a transit lane or bus lane (preferred) between Miller Street interchange to connect with the existing 24/ 7 T2 Transit Lane on Gore Hill Freeway (westbound). • Retain the 24/ 7 T2 Transit Lane on Gore Hill Freeway (eastbound and westbound) and Lane Cove Tunnel (eastbound) at all times. • Bus service routes and frequency should be mandated so that the Tunnel provides improved public transport provision between the lower north shore/ northern beaches and the inner west. It is not considered acceptable to 'provide the opportunity' only. 	P28	<p>Whilst efficient and reliable public transport is a laudable objective, it needs to be recognised that such public transport does not need to be 'road based' and that a number of projects which are relevant to the modelling, such as the Metro City and South West and the Sydney Metro West, are not. The fact that the impact of these projects, and road based projects such as the B line and the proposed B2 line along Warringah Road to Chatswood have not been properly considered raises concerns that a commitment to a toll financed motorway solution will create a financial imperative which will preclude consideration being given to road based public transport measures such as those suggested. In this respect, it needs to be noted that e.g. the number of JTW in private vehicles from NBLGA to Sydney LGA is about 5,400³. It also needs to be noted that there has been a consistent refusal by the NSW government to release the business case justifying this project.</p> <p>3 Census journey to work data</p>
<p><u>Motor Vehicles – Sydney Harbour Bridge</u> Consider introduction of congestion charging on the Sydney Harbour Bridge for both directions as a means to minimise the increase in commuter traffic and maximise the duration of, and maintain an acceptable level of service on, this link. Tolls can be applied to time of day and vehicle type to achieve the operational objectives and performance service levels (page 30)</p>	P30	<p>Whilst the introduction of congestion charging is a sensible measure, it was specifically excluded from consideration as part of the EIS due to NSW Government policy as I remember, but I haven't so far been able to find the reference to this in the EIS.</p>
<p><u>Supplementary Comments</u> 2.6.1 Target customers of the project Public transport users are customers of the project and should be included in the list. 2.6.2 Non-target customers of the project Active transport users are missing and should be considered.</p>	P33	<p>What is the point in amending the EIS to include these groups when the project as it stands makes no provision for them. In fact it will make things worse for them as compared to alternatives?</p>
<p>Issue not addressed by submission</p>	-	<p>The submission fails to mention that air pollution analysis is based on the assumption that Euro 6 emission legislation will be adopted in Australia for LDV and PCs from 2021, whereas this is not happening</p>

Annexure A

North Sydney Council's submission

4.1 TRANSPORT PLANNING

The methodology applied to the development of the project is questioned. An analysis of the project methodology against best practice How We Plan Transport (TfNSW 2016) transport planning processes is provided below. A number of inconsistencies are identified, including: a lack of clear problem definition and analysis; omission of benchmarking and case studies; limited non-motorway options analysis; use of out-dated modelling inputs/growth assumptions and an absence of consideration of the impacts of the Sydney Metro West project. The Sydney Metro West project is further progressed than the WHT and WFU, and will result in a significant reduction in traffic demand in the Rozelle area. It's exclusion from WHT and WFU modelling is fundamental as its inclusion in the analysis would potentially further bring into question the need for the WHT and WFU proposal.

4.1.1 Travel Behaviour Analysis

TfNSW's How We Plan Transport best practice transport planning manual identifies analysis of ABS journey to work data, Opal trip data, household travel survey data and travel behaviour modelling as the starting point for understanding current travel behaviour in the project precinct. This analysis has not been provided in the EIS. Without a clear understanding of travel patterns/problems in the project area, it is unclear:

- what problem/s the project is intended to address;*
- how the project team has determined appropriate project options for investigation; or*
- how the proposed projects address the Vision for Transport detailed in the State Government's Sydney Region Plan and Future Transport*

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SUB-9305%2120200326T040100.508%20GMT>

Annexure A

See attached GIPA response - Decision re B-line GIPA.pdf