

City of Sydney  
Town Hall House  
456 Kent Street  
Sydney NSW 2000

Telephone +61 2 9265 9333  
council@cityofsydney.nsw.gov.au  
GPO Box 1591 Sydney NSW 2001  
cityofsydney.nsw.gov.au

23 March 2018

Our Ref: 2017/497461  
File No: S112830

Ms Carolyn McNally  
Secretary  
NSW Department of Planning & Environment  
GPO Box 39  
Sydney NSW 2001

By email: [Carolyn.McNally@planning.nsw.gov.au](mailto:Carolyn.McNally@planning.nsw.gov.au)

Dear Ms McNally,

**WestConnex Stage 3 M4-M5 Link Environmental Impact Statement  
Submissions and Preferred Infrastructure Report**

Thank you for the opportunity to provide comments on the Submissions and Preferred Infrastructure Report. Please find attached the City's response to the Report.

The City strongly opposes WestConnex, including the proposed Stage 3 M4-M5 Link. We are extremely disappointed in the response by the Proponent to the issues the City raised in its comprehensive submission on the Environmental Impact Statement.

For the most part the responses are entirely inadequate and fail to deal convincingly with the issues raised by the City. On issues of a technical nature, the Proponent has largely dismissed the City's well developed arguments.

The Proponent's poorly developed comments demonstrate a lack of willingness to engage with the City in a meaningful way on matters concerning WestConnex that will impact negatively on both the local and wider community. We encourage the Department of Planning & Environment to examine closely the Proponent's responses to ensure that the issues raised by the City have been thoroughly and appropriately dealt with.

Should you wish to speak with a Council officer about the City's response to the Submissions and Preferred Infrastructure Report, please contact Sebastian Smyth, Executive Manager, City Access & Transport by telephone on 9246 7703 or by email at [ssmyth@cityofsydney.nsw.gov.au](mailto:ssmyth@cityofsydney.nsw.gov.au). We are happy to meet with the Department to discuss our concerns.

Yours sincerely



**Monica Barone**  
Chief Executive Officer

## City of Sydney (CoS) comments on RMS response to CoS Submission on M4-M5 Link EIS:

Section	CoS Submission Key Issues	RMS Response to CoS Issues	CoS Comments to RMS Response
1.3	<p>The costs outweigh the benefits and the Project is not financially viable unless the Sydney Gateway, Western Harbour Tunnel and Beaches Link and F6 Extension are constructed – yet no business case, funding commitment or timeline is provided for these other projects. The Project will create road network failures that may be used to justify further privately operated motorways.</p>	<p>(B10.3.6) Section 4.2.3 of the EIS describes the development of the M4-M5 Link concept, and specifically the identification of the opportunity to design the WestConnex program of works to support connectivity to planned future motorway networks, including a northern extension that would enable:</p> <ul style="list-style-type: none"> <li>- A connection to the Sydney CBD via Anzac Bridge, as well as to Victoria Road</li> <li>- A connection to the proposed future Western Harbour Tunnel and Beaches Link, which together with the M4-M5 Link, would create a western bypass of the Sydney CBD</li> <li>- Connectivity to The Bays Precinct</li> <li>- Reduction in surface traffic along Parramatta Road.</li> </ul> <p>(B10.3.7) While these related projects have been considered in the cumulative impact assessment for the M4-M5 Link, summarised in Chapter 26 (Cumulative impacts) of the EIS, the M4-M5 Link is not dependent on any of these projects proceeding and is feasible without them.</p>	<p><b>The RMS response does not address the issues raised by the City. DPE must require RMS to provide an accurate and complete response.</b></p> <p>As stated in our submission, no business case, funding commitment or timeline has been provided for these proposed future projects. It is noted that in its response, RMS has attempted to explain away this major flaw with numerous qualifying words, for example "<i>the identification of the opportunity to design the WestConnex program of works to support connectivity to planned future.....</i>"</p> <p>The City requests that DPE sanctions RMS for the use of deliberately misleading language as it threatens compromising the whole EIS process.</p> <p>The City disagrees strongly with the Proponent's conclusion that the Project is feasible without these other projects. Our analysis shows that the Project is not viable without them. For example: without the Western Harbour Tunnel, Beaches Link and F6 Extension the Mainline tunnels for the M4-M5 link would not need to be 8 lanes wide. Our analysis, as well as the 'Project' vs 'Cumulative' scenarios (Section 9.5.2) in the Stage 3 Technical Paper: Traffic and Transport (AECOM), indicates that without future stages, the mainline tunnels would need to be a maximum of four lanes wide.</p>
1.4, 2.1	<p>It is not clear how the detailed assessment of the Project, following any approval and subsequent detailed design and planning, will be undertaken and by whom as the 'detail of the design and construction approach presented in this EIS is indicative only based on a concept design and is subject to detailed design and construction planning to be undertaken by the successful contractors'.</p>	<p>(B10.1.4) The delivery mechanism adopted for the M4 East and New M5 projects is different to the approach for the M4-M5 Link. For the M4 East and New M5 projects, a design and construction contractor was appointed early (prior to the EIS being publicly exhibited) and therefore had direct input into the design development, EIS preparation and construction planning for those projects. Community and agency feedback during the M4 East and New M5 EIS exhibition period indicated a preference for the usual approach taken for projects of allowing the community to provide input into the scope of the project through the EIS public exhibition process before the detailed design of the project was undertaken and "locked in".</p> <p>After considering the community feedback on the issue, the approach of assessing a concept design has been adopted for the M4-M5 Link project. This approach presents the community and stakeholders with an opportunity to consider and provide feedback on the project before the detailed design work for construction of the project is carried out. Recent State significant infrastructure (SSI) development in NSW that has been assessed on a concept design includes M4 Widening, CBD and South East Light Rail and Sydney Metro City and Southwest.</p>	<p><b>The RMS response does not address the issues raised by the City. DPE must require RMS to provide an accurate and complete response.</b></p> <p>Notwithstanding the rationale provided by the Proponent, issues arise as a result of the detailed design and construction planning being undertaken by the contractor. The question remains: how can the NSW Government claim to understand and accept the environmental impacts of the project when the project is not yet defined?</p> <p>The City needs to understand how the public will input into the detailed design phase, and be assured that the City will be consulted in a meaningful way on behalf of our residents. And that should the project change in any significant way, the EIS would be revisited to ensure the previous findings are still valid.</p>

Section	CoS Submission Key Issues	RMS Response to CoS Issues	CoS Comments to RMS Response
3.1	<p>The EIS does not set out the specific transport needs addressed by the Project. Nor is it demonstrated that projections in growth in population and employment correlate to traffic demand increase along the proposed M4-M5 Link. As a result it is not possible to assess the Project's ability to meet those needs.</p>	<p>(B10.3.1) As noted in section 3.2 of the EIS, Sydney's population is forecast to increase from 4.3 to 5.9 million (around 37 per cent) by 2031 (NSW Government 2014), which equates to an average of 80,000 additional residents per year. Moreover, by 2036, the number of trips made around Sydney each day is forecast to increase by 31 per cent from 16 to 21 million vehicle movements. This growth would place increasing pressure on the NSW transport network and the key travel demand corridors connecting regional cities and major centres across the greater Sydney metropolitan area.</p> <p>The road network in the traffic and transport study area currently functions under high levels of traffic demand, which often exceeds the operational capacity, especially citybound during the AM peak period. Major routes in the traffic and transport study area, such as Parramatta Road, City West Link, Victoria Road, Anzac Bridge/Western Distributor, Southern Cross Drive, the Princes Highway and King Street, all experience significant congestion with resultant increase in travel time and variability, which can cause typical morning and evening peak hours to spread over longer periods, and extend the peak period.</p> <p>Without WestConnex, by 2031 travel speeds and congestion would significantly worsen on the road network serving western and southwestern Sydney (including the M4 Motorway, Parramatta Road, City West Link and the M5 Motorway corridor) and connections to Sydney Airport and Port Botany (eg the M1 corridor also known as Southern Cross Drive/Eastern Distributor). Congestion would also be a major issue on the key north-south links that connect the M4 and M5 motorway corridors (eg the A3 corridor also known as Centenary Drive/Roberts Road/King Georges Road), even with planned future public transport enhancements (Sydney Motorway Corporation 2015).</p>	<p><b>The RMS response does not address the issues raised by the City. DPE must require RMS to provide an accurate and complete response.</b></p> <p>RMS has justified the WestConnex mega project using an overly simplistic logic of:</p> <ul style="list-style-type: none"> <li>A) Sydney's population is growing, <b>therefore</b></li> <li>B) traffic will increase, <b>therefore</b></li> <li>C) the WestConnex project is require to address future congestion</li> </ul> <p>This is an erroneous and flawed justification for such a major urban intervention.</p> <p>Transport planning is complex and that for a mega project such as WestConnex, it is necessary to articulate:</p> <ul style="list-style-type: none"> <li>- How it will contribute to achieving the strategic transport aims of the State? (These are outlined in Future Transport, and are generally contrary to the transport outcomes that WestConnex will bring)</li> <li>- Which trips and needs will it serve (and which mode choices will it support) for different parts of Sydney?</li> <li>- How it will contribute to an integrated suite of transport investments and interventions (road, public transport, pricing, land use planning etc) to best deliver the desired outcomes?</li> <li>- Is the WestConnex project as currently proposed the best project, mode, investment, intervention available to the NSW Government?</li> </ul>
3.1	<p>The EIS states that the Project will improve connections to the Sydney Airport and Port Botany. It will not. The Sydney Gateway does not form part of the WestConnex project. Without the Sydney Gateway, connections between WestConnex (St Peters Interchange) and Sydney Airport and Port Botany will be via congested surface roads in Botany and Mascot.</p>	<p>(B10.3.7) The M4-M5 Link is part of the WestConnex program of works. Its purpose is to link other key component projects to form the WestConnex motorway. The project is a critical motorway link that contributes (together with the M4 East and New M5 projects) to connecting western Sydney's population and growth centres with employment and business opportunities in the Sydney CBD and the Sydney Airport and the Port Botany precinct, through a direct connection to the proposed future Sydney Gateway project at St Peters.</p>	<p><b>The RMS response does not address the issues raised by the City. DPE must require RMS to provide an accurate and complete response.</b></p> <p>Sydney Gateway remains a 'proposed future project' only. Until it is approved as a viable project, connections between WestConnex (St Peters Interchange) and Sydney Airport and Port Botany will be via congested surface roads in Botany and Mascot.</p> <p>If the project does not currently meet a key objective (to improve connections to Sydney Airport and Port Botany) it, should not be supported in its current configuration. This is a failure that has not been explained or addressed.</p> <p>Also crucial is how other parts of the planning case has changed since the original project was conceived, including:</p> <ul style="list-style-type: none"> <li>o The Sydney Metro West project was not considered in the original planning case,</li> <li>o The Second Sydney Airport has been announced with rail connections and new road connections, and was not considered in the original planning case.</li> <li>o Proposed additional Stages of WestConnex (Stages 4 and 5) have</li> </ul>

Section	CoS Submission Key Issues	RMS Response to CoS Issues	CoS Comments to RMS Response
			been added to the project, and among other things did not take into account the total toll load created by the additional legs, which will reduce the overall capacity to pay tolls.
3.3	<p>While WestConnex might integrate with the wider motorway network, no evidence is provided demonstrating that it integrates with the wider road network – let alone the broader transport and land use system. For example the Project will increase traffic entering the Sydney city centre, Australia's pre-eminent business centre. RMS has only just commenced work to identify which roads serving WestConnex portals will need to be upgraded to deliver large numbers of vehicles to and from the Project. It is therefore impossible to properly understand the environmental impacts – the very purpose of the EIS.</p>	<p>(B10.3.2) The anticipated impacts of the project, and the objectives and actions contained in the City Centre Access Strategy, have been considered together to determine potential transport interactions between the project and the strategy. The planned actions contained in the City Centre Access Strategy are reflected in the Strategic Travel Model (STM). STM is operated by Transport for NSW Transport Performance and Analytics and is used to project travel patterns in Sydney, Newcastle and Wollongong under different land use, transport and pricing scenarios. STM provided the trip forecasts used in WRTM, and therefore the planned actions contained in the City Centre Access Strategy are accounted for in the project evaluation.</p> <p>Traffic forecasts show that the project is <b>generally anticipated</b> to have little impact, or to reduce traffic on some roads that are identified as city centre bypass routes in the Sydney City Centre Access Strategy, such as the Cahill Expressway. However, other roads identified as city centre bypass routes are forecast to have increased traffic as a result of the project, including the Western Distributor, and the Cross City Tunnel. Changes in traffic volumes on these roads should be considered in the planning and implementation of the traffic and bypass priority routes.</p>	<p><b>The RMS response does not address the issues raised by the City. DPE must require RMS to provide an accurate and complete response.</b></p> <p>The response provided is deliberately misleading. WestConnex is mentioned twice in the SCCAS as the then Minister for Roads required this as a condition for signing off the document. And in both these instances the wording was crafted very carefully as even at that stage it was known that the WestConnex project worked against the aims of the SCCAS as well as many of the transport aims for the broader Sydney Metropolitan Area.</p> <p>Further, the STM and WRTM are both unconstrained, strategic models incapable of accurately or adequately reflecting the complex reality of the City Centre road network.</p> <p>Contrary to the RMS response, the EIS does <u>not</u> provide traffic forecasts for CBD streets or access routes, and the one figure it does provide indicates a 30% increase in traffic across the (already congested) Anzac Bridge.</p> <p>The City's analysis draws a contrary view, and assesses the impact as highly significant. The Proponent has failed to provide an adequate response to the issue raised by the City that the Proponent has provided no evidence to demonstrate that the Project integrates with the wider road network, which makes it impossible to properly understand the environmental impacts.</p>
3.9	<p>The Project does not improve connections to international gateways of Port Botany and Sydney Airport. It relies on this traffic filtering through surface streets that are already congested.</p>	<p>(B10.3.8) Should the Sydney Gateway project be delayed for a significant length of time, it is <b>expected</b> that both the New M5 Road Network Performance Review Plan (conditioned as part of the New M5 approval) and the proposed M4-M5 Link Road Network Performance Review would <b>confirm the operational traffic impacts</b> of the projects on surrounding arterial roads and major intersections. In the absence of the Sydney Gateway it would be necessary to introduce a number of upgrades at the following intersections to accommodate the forecast traffic:</p> <ul style="list-style-type: none"> <li>- Gardeners Road/Kent Road</li> <li>- Gardeners Road/O'Riordan Street</li> <li>- Kent Road/Coward Street</li> <li>- Bourke Road/Coward Street</li> <li>- Kent Road/Ricketty Street.</li> </ul>	<p><b>The RMS response does not address the issues raised by the City. DPE must require RMS to provide an accurate and complete response.</b></p> <p>If there is not commitment to delivering the Sydney Gateway at the time the Stage 3 EIS is done, then the impacts of these upgrades would need to be assessed. i.e. without a commitment to the Sydney Gateway, the EIS should be prepared on the assumption that it will <u>not</u> be part of the project.</p> <p>Without further information about the nature of the upgrades, it is not possible to know whether any such upgrades would reduce congestion, or to what extent any relief may be the result of simply pushing the problem out further along the network. To this end, the EIS is incomplete.</p>

Section	CoS Submission Key Issues	RMS Response to CoS Issues	CoS Comments to RMS Response
4.2	<p>The SEARs require analysis of feasible alternatives to the Project. No feasible alternatives have been developed and no analysis of alternatives has been undertaken. While Section 4.4 of the EIS purports to cover Strategic Alternatives, it does little more than offer a discussion of why an alternative was not pursued.</p>	<p>(B10.2.4) The EIS was prepared in accordance with the relevant provisions of the EP&amp;A Act. It was prepared to address the SEARs and the relevant provisions of Schedule 2 of the Environmental Planning and Assessment Regulation 2000 (NSW). <b>Consideration</b> of the project against a range of strategic alternatives to identify the extent to which they could meet the project objectives (refer to section 3.3 of the EIS for the project objectives) and how well they performed with reference to other transport, environmental, social and economic factors has been undertaken in accordance with the SEARs and is presented in section 4.4 of the EIS. The following strategic alternatives that were <b>considered</b> in section 4.4 of the EIS comprise:</p> <ul style="list-style-type: none"> <li>- Alternative 1 – improvements to the existing arterial road network</li> <li>- Alternative 2 – investment in alternative transport modes</li> <li>- Alternative 3 – demand management</li> <li>- Alternative 4 – the 'Do nothing'/'Do minimum' case</li> <li>- Alternative 5 – development of the M4-M5 Link.</li> </ul> <p>These alternatives are described in more detail in section 4.4.1 to section 4.4.5 of the EIS.</p>	<p><b>The RMS response does not address the issues raised by the City. DPE must require RMS to provide an accurate and complete response.</b></p> <p>The SEARs require an "<i>analysis of any feasible alternatives to the Project</i>". In its carefully (or cynically) worded response, RMS claims that it "<i>considered a range of strategic alternatives</i>".</p> <p>The City stands by its assessment that in undertaking a cursory <i>consideration</i> rather than developing and <i>accessing</i> a number of feasible alternatives, RMS failed to meet this key requirement of the SEARs.</p> <p>The City outlined minimum requirements of an assessment of strategic alternatives.</p>
5.2	<p>The description only represents a concept design for Stage 3 with the likelihood of changes once tenders are awarded. It is evident that the objective of many components of this project is securing sufficient patronage to justify eight traffic lanes in the mainline tunnels as well as future tollways instead of providing improved links to the existing airport or the ports.</p>	<p>(B10.5.2) The specific objectives of the project are:</p> <ul style="list-style-type: none"> <li>- Linking the M4 East and New M5 motorways so that further benefits and opportunities of WestConnex can be realised</li> <li>- Improving traffic conditions and reducing congestion on key arterial roads in proximity to the project</li> <li>- Improving accessibility and reliability for commercial vehicle movement in the M4 and M5 motorway corridors to economic centres, including to the Sydney Airport and Port Botany precinct</li> <li>- Facilitating urban renewal in areas where the project would reduce traffic</li> <li>- Minimising impacts associated with acquisition of residential and commercial properties on communities</li> <li>- Enabling long-term motorway network development by providing a connection to the proposed future Western Harbour Tunnel and Beaches Link project to the north</li> <li>- Delivering a project with a beneficial urban design outcome.</li> </ul> <p>As the project is part of the WestConnex program of works, the objectives of the project are consistent with those of WestConnex, as stated in the WestConnex Updated Strategic Business Case.</p>	<p><b>The RMS response does not address the issues raised by the City. DPE must require RMS to provide an accurate and complete response.</b></p> <p>A primary question remains: how can the NSW Government claim to understand and accept the environmental impacts of the project when the project is not yet defined?</p> <p>The City needs to understand how the public will input into the detailed design phase, and be assured that the City will be consulted in a meaningful way on behalf of our residents. And that should the project change in any significant way, the EIS must be revisited to ensure the previous findings are still valid.</p> <p>In relation to justifying eight lanes in the mainline tunnel, the Proponent has failed to provide sufficient evidence to dissuade the City from its view. RMS has not justified the need for eight lanes in the mainline tunnel to serve the traffic volumes identified for the "With Project" Case in Figure 9.6 and 9.7 of the EIS (Appendix H). The City is still of the view that 8 lane tunnels will rely on future stages for financial feasibility.</p>

Section	CoS Submission Key Issues	RMS Response to CoS Issues	CoS Comments to RMS Response
8.1	<p>There is a substantial discrepancy in the vehicle kilometres travelled in the base case modelling used in the M4-M5 Link EIS and the base case modelling used in the M4 East EIS.</p> <p>The M4 East EIS states vehicles in the study area travelled 14.5 million kilometres each day in 2014 (p9.45). The M4-M5 Link EIS states that vehicles in the study area travelled 11.5 million kilometres travelled each day (some 26 per cent more vehicles) (Appendix I p94).</p> <p>The fact that the M4-M5 Link EIS uses a substantially lower value calls into question the technical robustness, clarity and transparency of the EIS. This discrepancy must be explained.</p>	<p>(B10.8.2) As per the reference in the City of Sydney’s submission to page 94 of Appendix I (Technical working paper: Air quality) of the EIS, the values of 14.5 million VKT for the M4 East EIS and 11.5 million VKT for the M4-M5 Link are the total million vehicle kilometres for the WestConnex Graz Lagrangian (GRAL) modelling domain in the baseline years used for the studies. The GRAL domain refers to the dispersion model used for the operational ambient air quality assessment (refer to section 9.4.2 of the EIS for further detail).</p> <p>The M4 East EIS used traffic demand forecasts from the WRTM v2.1 which was refined for the M4-M5 Link to WRTM v2.3. In addition, the base and forecast years, land uses and demographics were different for both projects. The M4 East used a base year of 2014 and forecast years 2021 and 2031, while the M4-M5 Link used a base year of 2015 and forecast years of 2023 and 2033. Since the M4 East traffic assessments were undertaken, updates and enhancements to the WRTM inputs and zones have occurred. These included updated land use and population forecasts, including revised land use development along Parramatta Road, The Bays Precinct, the Western Sydney Airport and in Mascot town centre.</p> <p>In addition, a number of public transport improvements, such as those which form part of the Parramatta Road Corridor Urban Transformation Strategy (UrbanGrowth NSW 2016), were open to traffic and public transport users in the forecast years for M4-M5 Link resulting in different traffic patterns between the two projects.</p>	<p><b>The RMS response does not address the issues raised by the City. DPE must require RMS to provide an accurate and complete response.</b></p> <p>The updated WRTM v2.3 indicated a significant reduction (21%) in the number of vehicle kilometres travelled (VKT) which does not seem realistic and seems to model an overly optimistic scenario. It is known that when developing land use assumptions for the STM / WRTM, DPE / TfNSW distribute overall metropolitan projections to areas of planned development. The most recent version of the models cluster more intense land uses around the areas stated (Parramatta Road, The Bays Precinct, the Western Sydney Airport and in Mascot town centre) and actually added more jobs and residents to the Sydney Basin. This is why it is difficult to believe that the VKT reduced so significantly.</p> <p>The assumptions behind both models should be stated in detail to clarify why the VKT has reduced so significantly.</p>
8.2.2	<p>Information about the impact of traffic generated by the Project on the Anzac Bridge is scant. What little information is available suggests more traffic will attempt to travel on the bridge than can fit on it. Whilst chapters 10 and 12 of Appendix H show mid-block level of service at interfaces with interchanges and points within the tunnels, there is no information about other mid-block points such as the Anzac Bridge. The EIS refers to increases in daily traffic on the Anzac Bridge/Western Distributor, particularly in the AM peak, as traffic accesses the M4-M5 Link and the need for traffic or network management in the future (Part 8.3.3). However, the only solid data provided is the Average Weekday Traffic (AWT). This indicates that the Project would lead to traffic demand some 30 per cent higher than the capacity of the road link.</p>	<p>(B10.8.6) An assessment of the potential traffic and transport impacts from the project on roads around the Rozelle interchange, including the Anzac Bridge is provided in section 10.4 (for the ‘With project’ scenario) of Appendix H (Technical working paper: Traffic and transport) of the EIS. Management and mitigation measures specific to traffic and transport impacts on the Anzac Bridge are included in section 11.2.2 of Appendix H (Technical working paper: Traffic and transport) of the EIS.</p> <p>The analysis has shown that Anzac Bridge/Western Distributor is currently at or close to capacity in the 2015 base case, particularly in the AM peak where existing operational and geometric features of the road network limit the capacity. As a result, the predicted increase in traffic demands in all future scenarios cannot be accommodated without some form of traffic or network management.</p> <p>With the M4-M5 Link operational, there is an increase in the forecast eastbound AM peak hour demand, because the M4 East exit ramp and the Iron Cove Link to Anzac Bridge/Western Distributor provide bypasses of City West Link and Victoria Road respectively. Once the proposed future Western Harbour Tunnel and Beaches Link is operational, this forecast growth in demand reduces, but is still forecast to exceed the capacity of Anzac Bridge/Western Distributor.</p>	<p><b>The RMS response does not address the issues raised by the City. DPE must require RMS to provide an accurate and complete response.</b></p> <p>Section 10.4 fails to provide the normal primary measures of road network performance (such as peak period volumes on key road links. Rather, it provides a range of secondary (rolled-up, area based) outputs from the traffic modelling process (such as Total traffic demand, total vkt, Total vehicles arrived)</p> <p>Further, Section 10.4 provides intersection LOS for a number of locations on the western side of the Anzac Bridge but none on the eastern side - i.e. intersections in the CBD of Australia's global city. None extend across Anzac Bridge and to the City Centre.</p> <p>This raises the question of why did the proponent choose not to provide such fundamental modelling outputs? And inevitably leads to the suspicion that it is because they were too alarming.</p> <p>The RMS response essentially admits that WestConnex Stage 3 creates a major and intractable traffic challenge affecting the Sydney City Centre. Further, the response indicates that RMS currently has no solution or no means of mitigation. The purpose of the EIS process is to identify impacts and how they will be mitigated. Saying that RMS is developing a strategy is not a sufficient response and should not be accepted by DPE.</p> <p>Western Harbour Tunnel and Beaches Link are future proposals only, with no business case or committed funds. The City requests input</p>

Section	CoS Submission Key Issues	RMS Response to CoS Issues	CoS Comments to RMS Response
		Roads and Maritime is developing a strategy to ensure appropriate network integration in the areas surrounding the Rozelle interchange.	into the strategy being developed by RMS to ensure there is appropriate network integration in the areas surrounding the Rozelle interchange.
8.3.1	The EIS includes reference to induced traffic growth in terms of an increase of 0.3 per cent in Sydney traffic volumes included in the WRTM 'with project' and 'cumulative scenarios' to account for induced traffic growth.	<p>(B10.1.5) The combined number of new road trips and trips reassigned from public transport as a result of the full WestConnex program of works is anticipated to be around with induced demand equating to about 0.3 per cent of additional daily trips in the Sydney metropolitan area in 2033.</p> <p>(B10.5.9) The M4-M5 Link and the broader WestConnex program of works have been designed to have sufficient capacity to accommodate anticipated traffic volumes over the life of that infrastructure, including induced demand.</p>	<p><b>The RMS response does not address the issues raised by the City. DPE must require RMS to provide an accurate and complete response.</b></p> <p>It is relatively meaningless to provide an assessment of VKT increases across the Sydney Metropolitan Area. Far more relevant would be an assessment of traffic increases around WestConnex. The indications provided in Chapter 10 of Appendix G indicates that in the areas around interchanges, traffic levels (2033, with project scenario, AM peak hour) increase in the order of:</p> <ul style="list-style-type: none"> <li>- 43% - Wattle Street Interchange (Table 10-10).</li> <li>- 15% - Rozelle Interchange (Table 10-17)</li> <li>- 15% - St Peters Interchange (Table 10-125)</li> </ul>
8.4	The proposed Western Harbour Tunnel and Beaches Link would see traffic volumes increase, bringing volumes closer to the capacity of the mainline tunnel. This would lead to significant impacts across the surface road network. The resulting congestion would negatively impact surrounding communities, much of the inner city and road network at the southern end of the GEC.	(B10.8.5) Surface impacts surrounding the interchanges are described in Chapter 10 of Appendix H (Technical working paper: Traffic and transport) of the EIS, with Table 10-2 presenting the forecast percentage change in daily VKT, VHT and average speed in 2023 with the project on non-motorway links in the LGAs closest to the project. The forecast percentage changes indicate that, apart from Bayside LGA, all other LGAs would either benefit from reduced traffic on surface roads or there is no forecast change.	<p><b>The RMS response does not address the issues raised by the City. DPE must require RMS to provide an accurate and complete response.</b></p> <p>Notwithstanding the City's view that there are major flaws in the Proponent's modelling process, the traffic projections indicate that without future stages, the mainline tunnels would need to carry lower traffic volumes than required by 8 lanes as proposed. Also, referring to aggregated traffic levels across an LGA is misleading (and unlikely to be correct). It does not provide any meaningful assessment of localised impacts around portals and on-ramps.</p>
8.4.1	If the M4-M5 Link alone was built, without the Western Harbour Tunnel, Beaches Link and F6, traffic travelling along the link would only use one third of its capacity during peak periods. This significantly undermines the justification for building the mainline tunnel with four lanes in each direction.	(B.10.8.7) The inclusion of four lanes on the M4-M5 Link means that it is being designed to meet the traffic demands for the future. By considering the future demands, rather than the traffic demand expected at the opening of the stages, the project would enhance benefits and continue to facilitate future growth in Sydney's strategic transport network and connectivity between important economic centres along Sydney's Global Economic Corridor.	The overdesigning of the mainline tunnel will induce additional private vehicle trips onto the network which will result in congestion in areas outside the motorway network. Furthermore, these trips could otherwise have been public transport which would be more consistent with the Future Transport Strategy.



Section	CoS Submission Key Issues	RMS Response to CoS Issues	CoS Comments to RMS Response
8.7	<p>In the St Peters Interchange operational model area the EIS indicates that in the AM peak:</p> <ul style="list-style-type: none"> <li>– Almost all intersections will have a worse level of service than the current situation</li> <li>– Almost all intersections will have a worse level of service as additional proposed links are added to the network</li> </ul>	<p>(B10.8.8) The analysis has indicated a deteriorated network performance in the St Peters and Mascot area with the project. However, once Sydney Gateway is in place, a considerable amount of traffic would be removed from the St Peters and Mascot area and the network performance improved to a level generally better than in the ‘Without project’ scenarios. Sydney Gateway is expected to be open at a similar time to the M4-M5 Link. Specific interim mitigation measures for the ‘With project’ scenario are therefore not proposed.</p> <p>Should the Sydney Gateway project be delayed for a significant length of time, it is expected that both the New M5 Road Network Performance Review Plan (conditioned as part of the New M5 approval) and the proposed M4-M5 Link Road Network Performance Review would confirm the operational traffic impacts of the projects on surrounding arterial roads and major intersections. These reviews are scheduled at 12 months and five years after the commencement of operation of the New M5 and the M4-M5 Link respectively. Key intersections in the St Peters and Mascot areas are already identified for investigation as part of the New M5 conditions of approval and the following should be included in the M4-M5 Link Road Network Performance Review Plan:</p> <ul style="list-style-type: none"> <li>- Gardeners Road/Kent Road</li> <li>- Gardeners Road/O’Riordan Street</li> <li>- Kent Road/Coward Street</li> <li>- Bourke Road/Coward Street</li> <li>- Kent Road/Ricketty Street.</li> </ul>	<p><b>The RMS response does not address the issues raised by the City. DPE must require RMS to provide an accurate and complete response.</b></p> <p>WCX relies heavily on the Sydney Gateway, a project which has not yet been confirmed and should not be relied on as the lever to improve levels of service. Equal emphasis should be put on other improvements in the area.</p> <p>It is noted that without the Sydney Gateway, WestConnex will worsen the precise traffic issue it was proposed to address (vehicle access to the Airport and Port)</p> <p>As stated earlier:</p> <ul style="list-style-type: none"> <li>- Without further information about the nature of the upgrades, it is not possible to know whether any such upgrades would reduce congestion, or to what extent any relief may be the result of simply pushing the problem out further along the network.</li> <li>- Similarly, if there is no commitment to delivering the Sydney Gateway at the time the Stage 3 EIS is done, then the impacts of these upgrades would need to be assessed</li> </ul> <p>The review of the operational traffic impacts of the project on surrounding arterial roads and major intersections should be carried out earlier than 12 months after the commencement of operation of the New M5. The negative impacts of the Project will be felt by people travelling to, from and within the area from day one.</p>
8.12.2	<p>If the Project goes ahead a working group must be convened for development and implementation of the network integration strategy to be developed for the areas surrounding the Rozelle interchange by RMS. The working group must include relevant local government, Bicycle User Groups and Transport for NSW. The group should be established immediately following determination of the Rozelle and St Peters interchanges. Active transport infrastructure not identified in the EIS and/or Instrument of Approval must be specified in the network integration strategy.</p>	<p>(B10.8.15) The project will include the provision of new active transport connections that would substantially improve connectivity around the Rozelle and Lilyfield areas.</p> <p>Around the Rozelle interchange, key north–south connectivity would be established via the two new bridges over City West Link. These links would greatly improve accessibility between Glebe/Annandale and Rozelle/Lilyfield. They would also provide connectivity between the Rozelle Bay and Iron Cove, through key green spaces of Bicentennial Park, open space at the Rozelle Rail Yards, Easton Park and Callan Park.</p> <p>The City of Sydney has been consulted with during the development of the Active transport strategy. Further consultation on proposed temporary and permanent changes to active transport facilities and routes during planning and construction as identified in section 6.0 of Appendix N (Technical working paper: Active transport strategy) of the EIS would be carried out, including during the development of the CTAMP and the UDLPs, which will detail the temporary and permanent active transport infrastructure that will be delivered by the project respectively.</p>	<p><b>The RMS response does not address the issues raised by the City. DPE must require RMS to provide an accurate and complete response.</b></p> <p>While the WestConnex project provides a number of additional, isolated active transport connections, these are unlikely to mitigate the impacts on active transport due to increased levels of motor traffic around WestConnex. These impacts include higher traffic volumes and speeds, higher safety risks to people walking and cycling and worse air quality and amenity for people walking and cycling. The quality of consultation with the City during the development of the EIS was extremely poor. The City is seeking greater input than merely being consulted. We reiterate that a working group must be convened for the development and implementation of the Network Integration Strategy to be developed for the areas surrounding the Rozelle interchange by RMS.</p>



Section	CoS Submission Key Issues	RMS Response to CoS Issues	CoS Comments to RMS Response
9.4	The EIS (9.2.5) states that the tunnel portals are required to operate with no emissions of air pollutants from the portals. Given the increase in traffic volumes, and anticipated congestion at portals there will most likely be concentrated zones of vehicular exhaust emissions.	<p>(B10.9.5) Any congestion on the surface road network and the tunnels has been included in the assessment of surface road traffic in the air quality assessment. Any changes in the local air quality are shown in the contour change plots in section 9.7.3 of the EIS. These plots show an improvement in air quality on the surface road network along the route of the tunnels, although some of the surface road network such as to the north of the Iron Cove Link and near Anzac Bridge show increases in pollutant concentrations due to increased traffic volumes in the 'With project' scenario.</p> <p>Entry and exit ramps would vary in size and shape in response to local conditions, but all are designed to minimise gradient changes and congestion at the project portals both when vehicles are entering and exiting the tunnels. This would therefore minimise vehicles emissions being concentrated near tunnel ramps at either end of the project.</p>	<p><b>The RMS response does not address the issues raised by the City. DPE must require RMS to provide an accurate and complete response.</b></p> <p>The City has raised major issues with the traffic modelling process that informed the EIS. The City also noted that because traffic projections are a key determinant of air quality projections, the flaws in the traffic modelling compound in the EIS process - particularly in the assessment of air quality. The RMS has not addressed this issue of interdependency and compounding errors.</p> <p>As stated earlier, no traffic modelling has been provided for the Sydney City Centre - an area with extreme densities of receptors (people) who would be subject to any diminution of air quality due to WestConnex.</p> <p>The tunnel portals are required to operate with no emissions. It is therefore unacceptable for the Proponent to refer to 'minimising' vehicle emissions.</p>
13.4	<p>In Central Sydney increased traffic cannot be accommodated. It will further impede pedestrian movement, comfort and safety undermining easy access to public transport.</p> <p>Reduced access reduces effective job density (the relative access to jobs) over large areas of metropolitan Sydney. It undermines the attractiveness of Central Sydney to internationally competitive high productivity firms and their potential employees.</p>	<p>(B10.13.6) Traffic forecasts show that the project is generally anticipated to have little impact, or to reduce traffic on some roads that are identified in the City Centre Access Strategy as city centre bypass routes. However, other roads identified as city centre bypass routes are forecast to have increased traffic as a result of the project, including the Western Distributor, and the Cross City Tunnel. While these forecast increases are inconsistent to the City Centre Access Strategy, changes in traffic volumes on these roads should be considered in the planning and implementation of the traffic and bypass priority routes. There is little impact forecast on the roads within the CBD, while reductions are forecast for access roads to the CBD from the south, such as Broadway and City Road.</p>	<p><b>The RMS response does not address the issues raised by the City. DPE must require RMS to provide an accurate and complete response.</b></p> <p>The RMS statement that "<i>the project is generally anticipated to have little impact, or to reduce traffic on some roads that are identified in the City Centre Access Strategy as city centre bypass routes</i>" is so qualified that it is judged misleading. The EIS provides no evidence to support this.</p> <p>The City has serious concerns in relation to the impacts of additional WestConnex on all streets in the City Centre (and specifically the "Priority Routes for General Traffic" such as King Street, Market Street, Goulburn Street, Sussex Street, Kent Street).</p> <p>It is also noted that the SCCAS sets a clear position on avoiding any additional vehicle travel to/from and within the City Centre. It is incongruous to assert that the volumes on Bypass routes (e.g. Harris Street, Wattle Street, Western Distributor) will increase but will not lead to increases in traffic in and around the City Centre.</p>
14.4	<p>The economic impacts of the additional congestion forecast on Anzac Bridge have not been assessed and the economic impacts of any additional congestion in the city centre has not been considered.</p> <p>The economic and traffic modelling relied on in the EIS has not addressed the traffic impacts on the city centre. The costs of further congestion will result in increased levels of time lost. The analysis in the report shows Anzac Bridge and the Western Distributor are currently at, or close to, capacity particularly in the AM peak, but the traffic analysis has not provide projections of changes in traffic volumes approaching the city centre via the Anzac Bridge and Western Distributor.</p>	<p>(B10.14.3) Due to the small forecast change in the Sydney CBD with the project and the complexity of the CBD traffic operations, it was not considered appropriate to model the operation of intersections internal to the CBD. The forecast daily traffic demand changes can be seen in Figure 10.1 and 10.2 of Appendix H (Technical working paper: Traffic and transport) of the EIS and the forecast AM and PM peak hour traffic demand changes can be seen in Figure 3 and Figure 4 of Annexure B (Justification of modelled areas) of Appendix H (Technical working paper: Traffic and transport) of the EIS. These figures illustrate that the main changes are focused on the Western Distributor/Sydney Harbour Bridge and Sydney Harbour Tunnel/Eastern Distributor, with minimal changes forecast within the CBD (see section B10.8.6 for further information). The economic impacts of these traffic changes would therefore also be minimal.</p> <p>The EIS acknowledges that during operation, additional congestion is forecast on Anzac Bridge. However, from a network wide productivity</p>	<p><b>The RMS response does not address the issues raised by the City. DPE must require RMS to provide an accurate and complete response.</b></p> <p>The cited table 10.1 refers to vkt increases in the Sydney Metropolitan Area (12,400 square kilometres) so offers no meaningful indication of traffic increases in the Sydney City Centre (the original focus of the WestConnex project). The ability for the STM / WRTM to assess traffic increases in City Centre (As opposed to Sydney LGA, cited in Figure 10.2) is also highly questionable.</p> <p>The modelling is unrealistic and assumes WCX will be at full capacity with drivers willing to pay tolls.</p>

Section	CoS Submission Key Issues	RMS Response to CoS Issues	CoS Comments to RMS Response
		<p>perspective, the addition of the M4-M5 Link would provide a significant overall benefit. Roads and Maritime is developing a strategy to ensure appropriate network integration in the areas surrounding the Rozelle interchange.</p>	
26.2	<p>The SEARs requires assessment of the cumulative impacts of the 'key issues' identified in the Project Application (including traffic and transport, air quality, health and safety and noise vibration) as well as the cumulative impacts of other projects either related or in the vicinity of the project. The SEARs has specified projects proposed and approved where information is available at the time of writing and yet many are not assessed.</p> <p>Strategic transport infrastructure and master plan projects - Green Square, Western Sydney Airport, Central to Eveleigh – have been excluded from the cumulative impact assessment based on their inclusion in the WRTM version 2.3 traffic modelling however no information is available about the forecast populations or movements associated with these projects.</p>	<p>(B10.26.4) The SEARs for the project required an assessment of the cumulative impacts of the project taking into account other stages of WestConnex, the proposed future Western Harbour Tunnel, projects that have been approved but where construction has not commenced, projects that have commenced construction, and projects that have recently been completed. Cumulative impacts from a number of projects have been addressed in detail in the relevant technical working papers and appendices throughout the EIS. The methodology used for identifying projects to be included in the cumulative impact assessment is described in section B10.26.1 and Appendix C (Cumulative impact assessment methodology) of the EIS.</p> <p>(B10.26.5) The WRTM is linked to the STM operated by TPA, which is used to project travel patterns in Sydney. The data has been supplied by TPA and is based on the latest population and employment projections, including data incorporating known major urban renewal projects and developments. The base vehicle demands from STM are consistent with these demographic assumptions and therefore provide a consistent base for the future demands used in the WRTM. Projects and developments included in the WRTM v2.3 modelling also include the strategic directives contained in A Plan for Growing Sydney (NSW Government 2014) in 14 transport and land use corridors, including Green Square, Central to Eveleigh and the Western Sydney Airport. The WRTM contains commercially sensitive information and is not publicly available. The WRTM has been reviewed by independent experts who have verified its suitability for use in the NSW Government's transport planning investigations.</p>	<p><b>The RMS response does not address the issues raised by the City. DPE must require RMS to provide an accurate and complete response.</b></p> <p>It is unclear whether the transport modelling and traffic projections for WestConnex Stage 3 includes the following</p> <ul style="list-style-type: none"> <li>o The Sydney Metro West project</li> <li>o The Second Sydney Airport has been announced with rail connections and new road connections,</li> <li>o The Government is not currently able to deliver the 'Sydney Gateway', which include improved road connection to the port and airport.</li> <li>o Sydney Airport cannot provide any additional parking supply, so additional road capacity will bring little benefit.</li> </ul> <p>The City reiterates our comments and requests that the modelling be shared with the City on a confidential basis.</p>