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Director – Infrastructure Projects
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Submitted via the Department website

Dear Madam/Sir,

F6 Extension Stage 1 Environmental Impact Statement

Introduction

The City of Sydney (the City) opposes the F6 Extension Stage 1 for the same overarching reasons that the City has opposed all stages of WestConnex.

Although the F6 Extension is not within the City's LGA, it will provide direct connection to the WestConnex network and St Peters Interchange. By increasing the catchment of WestConnex it will funnel additional traffic into the City. On top of the significant negative impacts that have, and will continue to, affect our local communities as a result of WestConnex, the F6 Extension will only add to these poor outcomes.

Importantly, the F6 Extension fails to contribute to the Government's vision and objectives set out in Future Transport 2056.

The City's objections to the F6 Extension centre are based on its:

- lack of consistency with the NSW Government's stated policy frameworks
- incomplete business case based on assumptions that are overly optimistic
- congestion impacts on the global city of Australia affecting productivity, efficiency, business activity and competiveness
- degraded amenity for people impacted by additional traffic including reduced air quality
- risk of creating significant congestion impacts for the City of Sydney
- impact on the potential for more integrated land use and transport outcomes.

The Government has said that WestConnex Stage 2 New M5 cannot be stopped. If this is the case the City demands that the associated road project F6 Extension, along with the Western Harbour Tunnel and Beaches Link, be scrapped.

Lack of consistency with the NSW Government's stated policy frameworks

The Government's own Regional and District plans acknowledge that the future of Sydney's competiveness comes from creating connected places where people live in close proximity to jobs. This can only be delivered through affordable, reliable public transport. The Government's own transport plans acknowledge that public transport has superior carrying capacity – a train line (one track in each direction) can move around

50,000 people an hour, compared with two motorway lanes that can only move around 5,000 people per hour. In terms of return on investment for infrastructure, public transport therefore offers a solution that provides ten times the capacity (or ten times less space on surface or in tunnels to move the same demand).

The F6 Extension Stage 1 as outlined in the Environmental Impact Statement (EIS) does little to contribute to the Government's vision and objectives set out in Future Transport 2056, which has a focus on the role of transport in delivering movement and place outcomes that support the character of our future communities.

Transport 2056 refers to:

- a productive economy which relies on an efficient transport system, noting that congestion and network inefficiency increase costs, constrain growth, and stifle economic development and the mobility of services and labour
- liveable communities which promote social inclusion and the health and wellbeing of the people who live in them
- mobility as a 'placemaker' which can transform the public domain, activate centres and unlock new commercial and housing developments, renewing existing neighbourhoods and spaces
- *Places for people* (such as the Sydney City Centre and Village Centres) are the heart of communities and are more people orientated street environments. To support Places for People, the Movement and Place Framework identifies the need to better prioritise public transport, pedestrians, cycle and freight access whilst limiting through traffic with no destination in the centre.

The answers to the issues and opportunities outlined in Transport 2056 do not lie with building more tollways like the F6 Extension. The Government needs to commit to its own strategies and plans to achieve sustainable transport solutions with a focus on public and active transport.

Key issue to be addressed
There is a fatal flaw in the environmental assessment process for the F6 Extension insofar as the project goes against key NSW Government transport and land use policies and strategies.

While the EIS makes reference to these policies and strategies, the City questions the validity of the EIS interpretation that the project supports them.

Traffic

The Traffic and Transport Technical Report (Appendix D of the EIS) discusses the operational performance of the St Peters Interchange and surrounding area for the 'with project' scenario in Section 10.4.2. The assessment of the 2036 AM peak hour concludes that "*significant queuing is forecast on the exit ramp from the F6/New M5 Motorway to the Campbell Road/Euston Road intersection, which may queue back to the mainline motorway*". Queuing at the exit ramps creates significant safety concerns as a result of drivers quickly reducing their speed. The City is concerned that in response to the poor level of service on the ramps, the Roads and Maritime Services (RMS) may decide to modify the signal operations at the intersection to allow more signal time to vehicles exiting the ramp. Modifying the signals in this way would cause significant delays to pedestrians, people who bike and vehicles along Campbell Road which would be unacceptable to the City.

The stated objectives of the proposed F6 include improvements to urban amenity and place making by reducing traffic along key corridors such as Princes Highway and The

Grand Parade/General Holmes Drive. The screenline traffic assessment (Section 9.3.1) indicates a reduction of just under 15 per cent in 2026 and 2036 on General Holmes Drive/The Grand Parade. The reduction on Princes Highway has been assessed at around five per cent in 2026 and 2036 and more than 10 per cent in 2026 and 2036.

Even with the reduction of traffic volumes on the existing arterial network around the proposed F6 Extension Stage 1 area, the overall result is an increase in traffic volumes by 14-17 per cent, which suggests induced traffic demands and mode shift from public to private modes of transport. This is a very poor outcome for the City.

The screenline peak hour assessment (Section 9.3.2) shows an increase of around 66 per cent increase in traffic volume on the F6 Extension Stage 1 during the PM peak hour in the 2036 cumulative scenario. Further information is required however to understand this scenario as no explanation has been provided for this increase.

Key issue to be addressed
WestConnex has been proposed as a solution to regional traffic impacting local communities. WestConnex Stages 1 to 3 have necessitated significant road augmentations around portals to deal with the traffic generated by the project. Should the F6 Extension proceed:

- There must be no further allocation of road capacity (physical or operational) to serve traffic generated by WestConnex on road corridors leading to or within the City (such as roads connecting to the St Peters Interchange)
- It must include reallocation of road space (to public transport, active transport or better place outcomes) on roads leading to or within the City to limit induction of travel by motor vehicles. Reallocating road space to dedicated bus lanes or cycleways is one way of promoting more sustainable travel behaviour while reducing traffic induction. Traffic induction happens when people who didn't previously drive take advantage of road capacity freed up as other drivers divert to the WestConnex.

Congestion impacts on travel choices

Despite the Government's own policies, there is a major focus in the F6 Extension Stage 1 EIS on the bypassing of 23 sets of traffic lights on the Princes Highway. The Government is failing to make the link between what is considered to be the benefits of reduced congestion - reduced travel time and improved safety - with the effect this has on people's travel choices. If people can, or perceive they can, achieve a faster travel time by car than by public or active transport, people will switch mode to what is most attractive. The reverse is true for when capacity is reduced, people will move to active or public transport (particularly when there is priority or a dedicated corridor) to achieve the travel time savings. Reduced capacity is a primary trigger to implement demand management strategies, as is occurring in the CBD as a result of light rail implementation.

Congestion is already costing Sydney $6 billion a year and the Australian Infrastructure Audit estimates this will rise to $14.8 billion by 2031 if public transport isn't prioritised. Data shows that in the ten years between 2003 and 2013, the number of people driving into the Sydney City Centre remained fairly static while trips by public transport increased by around 40 per cent.

Since the light rail construction commenced in 2015, there has been an 11 per cent reduction in the number of inbound vehicles and a 9.4 per cent increase in public transport use into the CBD during the morning peak period. This shows that productivity

in the global city centre is boosted by more public transport capacity and additional road capacity is not required.

Key issue to be addressed
The EIS must address the intrinsic conflict with the NSW Government's policy to shift travel onto more efficient modes, such as public transport, with the proposal to make it more attractive for people to drive.

The EIS shows that only around 10% of the projected traffic on the F6 Extension would be heavy vehicles. It is clear, therefore that the financial viability of WestConnex requires the project to attract a significant amount of trips in private vehicles.

The City's Economy

As a key driver for the national economy, the area covered by the City is vital to Australia's future and the future of NSW. The City economy now totals approximately $125 billion, or almost a quarter of the entire NSW economy. Independent analysts suggest the City economy alone is contributing more than 10 per cent of Australia's current economic growth. It has overtaken the mining sector as the principal driver of Australia's economy along with the inner centres of other major Australian cities like Melbourne and Brisbane.

This economic growth is driving an increase in jobs. Since 2006, job numbers have grown by 100,000 to 498,000, an increase of almost 30 per cent, making the City the epicentre of jobs and job growth in Australia.
This is notable, because during this period of unprecedented economic development:

- the number of people driving to the City Centre was steady between 2003 and 2013[1]
- Inbound vehicles to the CBD during the morning peak period have reduced by some 12 percent since light rail construction started in 2015[2].

One of the most significant risks to this is the Government's relentless focus on expanding the urban motorway network. Why would this Government risk economic growth by attracting more cars into the Harbour CBD when every plan about the central city's competiveness has been working to get cars out? And why would the Government risk compromising the future of our city's economy, entrenching the east-west social divide and condemning thousands of people to privatised, unsustainable, expensive and inefficient tolled car travel.

Key issue to be addressed
The EIS must address the intrinsic conflict with the NSW Government's transport, land use and economic policies relating to the City and the Sydney City Centre by making it more attractive for people to drive.

The EIS's for all current stages of WestConnex have so far failed to provide:

- A clear functional specification of the role of WestConnex in relation to vehicle access for the City and Sydney City Centre – i.e. is it aiming to bring people to/ from the City or act as a bypass?
- A transparent assessment of projections of how WestConnex will change traffic to / from and within the City and City Centre.

[1] *Sydney City Centre Access Strategy* (NSW Government, 2013)
[2] NSW Government

- Clear commitments for how the NSW Government plans to prevent / manage / mitigate the impacts of WestConnex-generated traffic on the City and City Centre. This should include reallocation of road space (to public transport, active transport or better place outcomes) on roads leading to and roads within the City to limit induction of travel by motor vehicles.

Because the F6 Extension will add to Stages 1-3 and result in cumulative impacts on the City and City Centre, the EIS for the F6 Extension must provide the above.

Active Transport

The Government's focus on more motorways means more traffic, and less attention being given to active transport both in terms of existing and future networks. The City is concerned about any potential deterioration in conditions for walking and cycling as a consequence of the Government delivering more roads, including the F6 Extension.

The City wishes to work with the Government to help it achieve its own goals in relation to active transport. This means the provision of direct, safe and convenient access for people walking and riding, rather than prioritising more space for vehicular traffic and service areas.

Key issue to be addressed

Because of the additional WestConnex traffic generated by the F6 Extension, the EIS must address the cumulative impacts of the project on the City and City Centre.

This must include commitments to reallocate street space to active transport (widened footpaths, additional separated cycleways) to ensure that the City can help deliver NSW Government's policies and strategies relating to active transport and improving place outcomes.

The relationship between WestConnex and other toll road projects

From the limited information that is publically available, WestConnex Stages does not appear to be financially viable. It depends on other new tollways including the F6 Extension, Western Harbour Tunnel and Beaches Link to be built, to generate enough traffic for tolls to deliver sufficient revenue to cover the capital costs of WestConnex.

In the absence of more information it is impossible to accurately determine the final benefits and costs of the combined impact of these tollways on Sydney. The City sees no benefit and many disbenefits in the Government continuing with any of these projects.

Key issue to be addressed

The EIS must be transparent on the reliance of project viability (financial, economic and operational) on any future (as yet unapproved) stages.

This is critical to understand the risk of changes to impacts identified in the EIS in the case where future stages are not delivered or are delivered later than assumed.

Air Quality

The City strongly objects to the F6 Extension being approved as it will lead to a decline in air quality affecting the City.

The F6 Extension Stage 1 EIS proposes ventilation facilities at Marsh St, Arncliffe and West Botany St, Rockdale. NSW Health (Sections 3.2 and 3.3) has expressed concerns over the lack of filtration provided in the ventilation facilities and Bayside Council, through whose boundary the F6 Extension would run, has expressed a preference for filtered ventilation outlets. The community has also expressed concerns over the health and safety impacts on residents in the area and called for an investigation into the impacts of unfiltered ventilation outlets, which the City supports.

RMS has responded by stating "*Experience from previous motorway tunnel projects in Sydney has demonstrated that emissions from tunnel ventilation outlets do not measurably affect local or regional air quality*". It also noted that "*Evidence to date suggests that the effectiveness of filtration, when applied to road tunnels, is limited to specific situations. Repeated assessments have concluded that there is little to no health benefit for surrounding communities in installing tunnel air treatment systems*", adding at Section 9.1.2 that, "*Around the world, there are relatively few road tunnels with installed filtration systems. There are no Australian road tunnel projects that have installed air filtration systems, these projects rely on the primary approach of dilution of air pollution, through ventilation systems. The inclusion of in-tunnel air filtration for the project was evaluated, based on the predicted air quality results, and found not to provide any material benefit to air quality or community health. As a result, no in-tunnel filtration system is proposed for the project*".

The City does not agree with RMS's conclusions or its justification for not using filtration in the tunnel ventilation outlets. International projects of a similar nature that use filtration should be compared against those that do not, in order to assess the improvements in air quality. The City's view is that ventilation outlets must be filtered.

Vehicles are becoming increasingly efficient, but more rigorous emissions standards incorporating Particulate Matter (PM) have only been in place in Australia since 2013 and only apply to emissions; there are no measures in place to reduce the significant non-emission vehicle contribution to particulates. In NSW around 78 per cent of the vehicle fleet was manufactured before these regulations were put in place.

Research has shown that any exposure to PM generated by traffic is detrimental to health; there is no safe exposure level. Further, children, the elderly and people with chronic disease are particularly at risk of the health effects of traffic related PM. These particulates are a classified carcinogen and are known to have critical, and at times fatal, consequences if elevated. Concentrations of PM2.5 and PM10 in Sydney are already near the current Australian standard and in excess of proposed standards.

The adverse health impacts of living close to busy roads is well documented and studies looking specifically at Sydney have shown consistent results. These health impacts include increased mortality, respiratory and cardio-vascular disease, and adverse birth outcomes. Many other health impacts have also been associated with living near busy roads including cancers.

While larger particulates are concentrated in road corridors, smaller particulates are more evenly spread across the urban area as the smaller particles remain airborne. People living within 500 metres of heavily affected areas have demonstrably shorter lives, much higher incidences of chronic lung conditions and higher levels of cardiovascular diseases.

Should the F6 Extension proceed, the dual effects of induced traffic and toll avoidance will see traffic volumes increase and congestion worsen, increasing exposure to PM across metropolitan Sydney. As two-thirds of the NSW population lives in metropolitan Sydney in relatively close proximity to major roads, vehicles are one of the most important sources of PM exposure in NSW and therefore a significant contributor to negative health outcomes.

Key issue to be addressed

Because of the additional WestConnex traffic generated by the F6 Extension, the EIS must address the cumulative impacts of the project on the City and City Centre.

The EIS must clearly and transparently assess and address air quality impacts arising from additional traffic (and congestion) generated by WestConnex (with the F6 Extension) along surface roads within the City.

Conclusion

The City opposes the F6 Extension Stage 1. It will provide a direct connection to St Peters Interchange and funnel additional traffic into the City. On top of the significant negative impacts that will continue to affect our local communities as a result of WestConnex, the F6 Extension will only add to these poor outcomes.

The F6 Extension fails to contribute to the Government's vision and objectives set out in *Future Transport 2056,* the District Plan, Sydney City Centre Access Strategy and numerous other associated policy and strategy documents. The Government acknowledges that the future of Sydney's competiveness comes from creating connected places where people live in close proximity to jobs. This can only be delivered through affordable, reliable public transport; the Government needs to commit to delivering sustainable transport solutions with a focus on public and active transport.

There is a major focus in the F6 Extension Stage 1 EIS on the bypassing of 23 sets of traffic lights on the Princes Highway. The Government is failing to make the link between what is considered to be the benefits of reduced congestion with the effect this has on people's travel choices. If people think they can achieve a faster travel time by car, they will switch mode to what is most attractive. The reverse is true for when capacity is reduced, people will move to active or public transport to achieve the travel time savings. Congestion is already costing Sydney $6 billion a year which is tipped to rise to $14.8 billion by 2031 if public transport isn't prioritised.

The City is not convinced by questionable traffic modelling presented in the EIS and its projections of reductions of traffic volumes on the existing arterial network around the proposed F6 Extension Stage 1 area. The reality of numerous urban motorways in Sydney and other Australian Capital Cities show that unless traffic capacity is removed from the road network, these projects inevitably induce traffic. The City also notes that the traffic assessment shows an overall increase in traffic volumes by 14-17 per cent, which suggests induced traffic demands and mode shift from public to private modes of transport. This is a very poor outcome for the City.

The City strongly objects to the road being approved as it will lead to a decline in air quality. If it were to proceed, ventilation outlets must be filtered.

The Government has said that WestConnex Stage 2 New M5 cannot be stopped. If this is the case the City demands that the associated road project F6 Extension, along with the Western Harbour Tunnel and Beaches Link, be scrapped.

Should you wish to speak with a Council officer about the about this submission, please contact Elise Webster, Manager Transport Major Projects on 9265 9333 or at EWebster@cityofsydney.nsw.gov.au

Yours sincerely

Monica Barone
Chief Executive Officer