

City of Sydney Response to: M8 draft road network performance review (TfNSW)

Contents

1. Introduction	3
2. Key issues and required mitigation	5
Appendix A	20
Appendix B	22

1. Introduction

1.1. Purpose of this Submission

This document provides the City of Sydney ('the City') submission on the TfNSW *WestConnex M8: Draft Road Network Performance Review Plan* ('M8 Review').

1.2. Scope of this Submission

The Scope of the City's submission has been limited to the M8 Review document and a some related data provided by TfNSW in response to the City's request. The City has only consider the impacts of the M8 motorway within its boundaries. The City has not discussed the impacts of the M8 motorway on streets or intersections outside the LGA.

At the City's requested TfNSW provide the following data included in the scope of this submission.

TfNSW provided additional pre and post opening data at ther request of the City :

- Road Safety summary and detailed crash reports) at the following locations:
 - Botany road
 - Bourke Road
 - Canal Road
 - Euston Road
 - Gardeners Road
 - Kent Street
 - King Street
 - O'Riordan Street
 - Sydney Park Road
- Vehicle count data at the following locations
 - Gardeners Road and Kent Road
 - Bourke Road and Bourke Street and Gardeners Road
 - Gardeners Road and O'Riordan Street

Council was also provided with the following information, however there was insufficient time to include this information in the scope to include analysis of:

- TfNSW M8 travel time model outputs (summary provided in a power point presentation)
- TfNSW traffic count data – Matrix Traffic and transport data 2019 and 2021.

TfNSW evaluation frameworks:

The submission also includes references to the following performance framework/ guideline documents:

City of Sydney Response to:
M8 draft road network performance review (TfNSW)

- Movement and Place: The “cross-government framework for planning, designing and managing our transport networks to maximise benefits for the people and places they serve.” (TfNSW website)
 - TfNSW Road Safety Program Guidelines – Local Government Road Safety Program Guideline 2022/23
-

1.3. Background

1.3.1. New M5 Consolidated MOD 1 consent conditions requirements

The NSW Government M8 project consent condition E40 requires the proponent prepare a Road Network Performance Plan that addresses the following

- Compare road network performance pre and post SSI opening at specific intervals 12 months, and 5 years
- Consult Councils in the development of the M8 Review
- Undertake a detailed comparison of road network performance at interchange exit points and specific intersections
- Discuss and consider current and future land use impacts and the impacts of other major road projects within the project area
- Consider all road users and road based transport modes, including people who walk and cycle.
- Propose and quantify the mitigation measures and their impact to remove or limit any adverse impacts on any road user groups created by the M8

Appendix A - New M5 MOD 1 Conditions of Consent E40

In addition, Consent Condition B44 requires that the proponent uses the outputs from the M8 Review in consultation with Council during the development of the Sydney Park Junction Project (formally known as the King Street Gateway Project).

1.3.2. TfNSW engagement with City of Sydney

Condition E40 requires TfNSW to consult with Councils during the development of the Road Network Performance Review .

The three engagement touch points between the City and TfNSW for the M8 Review were:

- July 2021- City proactively and pre-emptively engaged TfNSW to propose key elements that TfNSW should include in its M8 review. TfNSW provided no formal response or acknowledgement of City’s input. See Appendix B email from S Smyth to M8 review team.
- April 2022 – Cos provided feedback during the three week formal consultation process within the strict limitations of the “bang the table” engagement tool, and in a separate letter to the M8 review team.
- May 2023 - Current draft M8 Review consultation.

TfNSW provided CoS with a copy of their engagement report “M8 Road Network Performance Review Consultation report July 2022” in October 2022.

2. Key issues and required mitigation

2.1. M8 Review approach, methodology and targets go against NSW Government Policy and are not fit for purpose

2.1.1. TfNSW approach to the M8 review is not consistent with key NSW Government policy

The TfNSW approach to the M8 review is not consistent with key NSW Government policies and strategies including:

- TfNSW Future Transport Strategy
- TfNSW 2026 Road Safety Action Plan
- TfNSW Movement and Place framework including the TfNSW Road User Space allocation Policy
- TfNSW Road Safety Program Guidelines – Local Government Road Safety Program Guideline 2022/23
- TfNSW Active Transport Strategy
- TfNSW South East Transport Study

The proposal undermines the vision and objectives that the NSW Government has publicly adopted in a number of recent strategies and plans. As a result, it erodes confidence in the value of the NSW Government's strategic planning. TfNSW is required to follow and embed NSW Government Policy into its work, especially when the project is located in a dense, inner city location.

The M8 Review must demonstrate strategic alignment with Government Policy and Strategies

The M8 review should identify relevant project objectives consistent with the Movement and Place framework, Future Transport Strategy, The TfNSW Active Transport Strategy as well as the NSW M8 Environmental Impact Statement (EIS) and business case. The objectives should align with the following relevant TfNSW strategies and policies

- Future Transport Strategy : Objectives – *“Maximising the use of our network, (by) releasing the potential of our infrastructure We will focus on getting more out of our existing investments, by reallocating road space to more efficient modes of transport like buses, walking, cycling and micromobility devices”*
- TfNSW Movement and Place framework including the TfNSW Road User Space allocation Policy Objective – *“ to understand how transport networks are integrated with land use and public space within the study area, and how they serve different users’ needs”*
- TfNSW 2026 Road Safety Action Plan – Vision *“Zero fatalities and serious injuries by 2050”*. Target *“Halving fatalities on NSW roads by 2030”* and *“Reducing serious injuries by 30% on NSW roads by 2030”*
- TfNSW Active Transport Strategy Objectives – *“Enable 15 minute neighbourhoods”* and *“Deliver connected and continuous cycling networks”*

City of Sydney Response to:
M8 draft road network performance review (TfNSW)

– TfNSW South East Transport Study 2020

Vision

- *“Liveable - People living in South East Sydney have easy, safe and reliable access to a wide and diverse range of employment opportunities, open space, education and healthcare, regardless of age, income or mobility. Residents can access schools, parks and fresh food within their local area”.*

Objectives:

- All residents have easy, safe and reliable access to employment, open space, education and healthcare.
 - All transport services are universally accessible.
 - All residents can access a major employment centre (e.g. strategic centres, Eastern Harbour, City CBD, Randwick Health and Education Precinct, Sydney Airport and Port Botany) within 30 minutes by public transport.
 - All residents can safely walk to a local centre.
 - Transport contributes to, and maximises the potential for, job growth through South East Sydney.
 - The transport network is easy to use and understand and provides more 24/7 access.
 - Businesses in South East Sydney are efficiently and sustainably connected to each other and their customers”
- M8 EIS - NSW M8 EIS
- Objectives - “Cater for the diverse travel demands along these corridors that are best met by road infrastructure”

The M8 Review *assumes* that the objectives of the M8 project are to build a Motorway to reduce travel time for vehicles between King Georges Road and St Peters, *without having any impact or creating any road function changes on the surrounding road/ street environment.*

The M8 Review must measure performance against the full set of project objectives

Having established objectives the M8 Review should measure performance against these objectives for a range of relevant criteria for all types of customers *and* apply different targets for different types of road/ street environments.

The City is of the view that the M8 review had a myopic focus on vehicle movements, reflecting RTA practices circa 1985 rather than current NSW Government policy.

For example: the M8 review methodology should demonstrate the changing function of the Princes Highway between Campbell Road and Sydney Park road. Pre M8 the Princes Highway was a through movement corridor e.g.: 6 lane state controlled arterial road connection to the south of the City. Post M8 opening the Princes Highway's function has shifted to a high value place, the movement of through vehicles is being deprioritised (fewer travel lanes, slower speed) and access for people has increased (on street parking, more crossings, wider footpaths).

The M8 Review road safety crash analysis methodology should demonstrate its contribution to achieving the Vision Zero Goal, and assess road trauma crashes consistent with Centre for Road Safety Program Guidelines..

2.1.2. TfNSW methodology for the M8 Review is not consistent with Government policy and provides insufficient assessment of movement and place outcomes.

The methodology that TfNSW adopted for the M8 Review does not adequately meet the requirements of the Movement and Place framework that says:

City of Sydney Response to:
M8 draft road network performance review (TfNSW)

“ The aim of ..(understanding movement.. is to understand how transport networks are integrated with land use and public space within the study area, and how they serve different users’ needs... Consideration of a range of options for improving transport networks is a necessary part of any movement assessment.... movement links need to consider whether existing infrastructure could be reused, repurposed or used by a different mode... In all scenarios, understanding the service required of all potential modes of transport is crucial.”
(TfNSW Movement and Place website 2023)

The basic methodology that TfNSW adopted for the M8 review is focussed on measures of traffic speed and volume without consideration how the M8 may have (or could have) *changed* the function of these roads or streets. The TfNSW Movement and Place framework sets out a process for evaluating performance of streets and roads against a more complete set of criteria. By using speed and volume as the only criteria, TfNSW has captured only a very narrow slice of a road or streets performance and only from the perspective of *private and commercial vehicles*. It does not consider all road user needs, and as such is *not a Road Network Performance Review Plan*, it is a vehicle performance plan.

The M8 methodology includes:

- *“comparing traffic volumes and speed before and after the opening of the M8 Motorway (June 2020 to June 2021) on roads identified in the study area”*
- *“the total number of crashes, pre and post M8 Motorway opening to establish any trends in crashes, including the percentage of crashes that involved heavy vehicles.”*

This methodology does not, however, consider the performance of the network from the perspective of people who walk, or cycle or use public transport.

This approach is:

- Inconsistent with the NSW Government Movement and Place framework and the objectives of the New M5 EIS as alternative criteria which consider all users of the corridor including people who walk, ride or use public transport. In addition, the road network environment created by a Motorway network has impacts that should be considered at a network, regional and local level.
- Inconsistent with the NSW M8 EIS *“Cater for the diverse travel demands along these corridors that are best met by road infrastructure”* There has been no analysis of the impacts of the M8 on the travel needs of people who walk or ride, despite the significant investment in cycling infrastructure.

As part of the M8 Review process, the City provided input urging TfNSW to ensure that its approach to the M8 Review was consistent with Movement and Place approach. TfNSW’s performance assessment should use criteria consistent with the post Motorway opening road function. E.g., state road pre Motorway and local road post Motorway. TfNSW has adopted criteria that positively assess maintaining existing travel speeds and traffic volumes. State roads changed to local roads should travel at slower speed, and carry fewer vehicles. These issues are discussed further in later sections.

2.1.3. TfNSW “overarching” performance targets used in the methodology for the M8 Review only measure against the *status quo* for motor vehicles and ignore impacts on other road users.

The M8 Review targets roads with *“an increase in traffic volumes of greater than 5% and a speed reduction of more than 5km per hour when comparing pre and post opening data”* are an inadequate reflection of how there should be different targets for different street function.

The M8 Review assesses only a small number of locations based on performance targets relating to motor vehicles. The targets do not consider the operation of the roads for other road users (such as people walking and cycling).

City of Sydney Response to:
M8 draft road network performance review (TfNSW)

Further, considering the extensive investment in Motorway infrastructure, the criteria (quantum of change “5%”) that TfNSW used in the assessment of traffic volumes are very small. This indicates a very weak level of ambition when it comes to assessing the outcomes and benefits of such a major project. It is very disappointing that TfNSW’s measure of project success is maintaining the *status quo* rather than making an improvement to the existing situation.

2.1.4. The TfNSW methodology for the M8 review does not adequately address road safety

The NSW Government road safety target is Vision Zero, by 2026 the Governments Road Safety Action Plan (TfNSW 2021) features “*new targets to halve deaths and reduce serious injuries by 30% on NSW roads by 2030*”. To achieve this target the Government has adopted a “*Safe Systems approach*” - an “*holistic and proven approach that considers how people, vehicles, speeds, and roads work together to create a safe system*”.

The NSW Centre for Road Safety describes the first step as: *to assess the road safety challenge, and then to apply the safe systems approach to address the challenges identified*. The Centre for Road Safety has assessed the overall road safety challenge across NSW and identified the following Priority areas for action:

- Creating safer country road and urban spaces
- Enhancing road safety in local communities
- Increasing the safety of light vehicles
- Making safer choices on our roads
- Ensuring safety of vulnerable and other at-risk road users

The M8 Review does not adequately describe the road safety challenge and does not use the NSW Centre for Road Safety road safety assessment framework to prioritise actions. The M8 Review’s reliance on a small sample (one year of pre and post opening data) may not identify the breadth or number of relevant road safety trauma challenges. Relying on a one year sample especially during COVID is likely to result in under-reporting of road trauma. While there is insufficient data to analyse 5 years of crashes post opening, there is no reason why the pre-opening data analysis cannot be based a longer period to be consistent with best practice

The M8 Review “*4.2 Road safety performance*” presents data in an opaque way that makes it impossible to understand the road safety challenge and therefore impossible to understand the impacts of the M8 on road trauma risk across the surrounding network. Further, it makes it difficult to assess any action necessary to mitigate those risks. There is no road safety data, no road trauma mapping. It is inconsistent with the *TfNSW Road Safety Program Guidelines – Local Government Road Safety Program Guideline 2022/23 section 7.2 – Identifying road safety issues* that requires “*Crash data that indicates there is a road safety issue in your area use(s) the most recent finalised five-year data*”.

Key trends that TfNSW identifies in the safety performance post M8 opening are misleading:

- Issues with Trend 1: “*A 41% reduction in all crashes and 50% reduction in serious injury crashes on the M5 East*”

TfNSW seems to suggest that by doubling the amount of road space (i.e.: duplicating the M5 East with the M8) and halving the road trauma on the M5, the M8 has been successful. The connection between the M8 opening and the M5 East crash reduction could be coincidental and unrelated and it is misleading to link a road safety trend post opening M8 with the M5 east without data to back up the claim.

- Issues with Trend 2 and 3: “*The severity of crashes has decreased*” and “*A 5% reduction in the number of crashes across the study area road network in the 12-month period after the M8 Motorway opened*”.

It is unclear where in the study area TfNSW has assessed crashes – i.e., whether the M8 Review includes all crashes on state roads *and* local roads (or whether it has only considered a

City of Sydney Response to:
M8 draft road network performance review (TfNSW)

subset of crashes). The M8 Review cannot claim a reduction in severity of crashed unless *all crashes in the study area have been analysed*. The review of crashes need to address the following questions: Have decreases occurred on a subset of the study area or across the whole network? For which road users has the severity decreased?

The City requested TfNSW crash data and analysis. TfNSW provided the City with crash summary and detailed reports for nine roads / intersections, these report only addressed crashes on state roads.

- Issues with Trend 4: *“Road corridors that showed an increased number of crashes following the opening of the M8 Motorway were assessed by the Centre for Road Safety and Transport’s Network Safety team. This included Stoney Creek Road and Forest Road, Canterbury Road, King Georges Road and Moorefield’s Road. The assessment found that:*
 - *crashes were isolated incidents with no clusters identified; and*
 - *crashes were largely congestion related (rear end, lane change) and resulted in minor or non-casualty injuries.”*

TfNSW has not made it clear where within the study area road crashes have increased. The M8 Review identified 5 corridors, but it is not clear which other corridors were evaluated. Further, it is not clear whether crashes were assessed at locations where local roads intersect with State roads

There is no transparency around how TfNSW teams concluded that *“crashes were largely congestion related”*. The Centre for Road Safety road trauma assessment process uses approx. 90 Road User Movement Codes (RUM) none use the term “congestion related”.

The failure of TfNSW to adequately describe and quantify crashes post M8 opening in a systematic and accurate manner shows a lack of regard to the Road Safety Vision Zero target.

The City has little confidence that TfNSW assessed and considered crashes in the context of *all road users*. While rear end crashes may result in minor or non-casualty injuries, the local environment where these crashes occur may also have vulnerable users.

The M8 Review lacks transparency and verifiable evidence about its findings and whether minor crashes were also considered in the context of vulnerable road users (people walking and cycling).

2.1.5. The M8 Review does adequately assess impacts of vehicle speeds and volumes on the state or local road network

The M8 Reviews focuses on maintaining vehicle volumes and vehicle speeds. Neither measure is consistent with a Movement and Place assessment of streets. Post Motorway opening streets in the study area have changed function, vehicles speeds and volumes targets have also changed.

The M8 reviews has the following vehicle speed and volume analysis deficiencies:

- No pre and post Motorway opening street function assessment to guide a comparison of performance between pre and post opening was undertaken. TfNSW has assumed the function of roads remains the same. Assessments are high level and lack details about the place impacts to streets and neighbourhoods from the rearrangement of streets to support the M8.
- Confusing and disjointed summary of performance data eg: M8 Review- Section 4. Key findings *“Up to 24 additional heavy vehicles on Gardner’s Road each Peak hour.”* TfNSW has not been clear as to whether the stated traffic increase is consistent with background heavy vehicle growth on Gardner’s Road or even if the vehicles exited from the Motorway.
- Lack of transparency in reporting before and after network travel times , vehicle volumes, vehicle speeds across the study area to support claims about the impacts of the new motorway exits e.g.: 14% reduction of vehicles using Princes Highway or 27% using Sydney Park Road is presented without any context. If road space on Sydney Park road has been reduced by 30% then the reduction in vehicles volumes should be closer to 30% than to 10% . TfNSW not

City of Sydney Response to:
M8 draft road network performance review (TfNSW)

provided sufficient information to validate the findings, has provided no context and as such the City has no way of determining if what has been achieved is “good” or even “good enough”.

- Use of deliberately opaque and unclear assessment descriptions such as the road corridor is “adequately coping” or “adequately handling” increases in traffic eg: “The road is coping with the additional traffic demand...” . Findings about vehicle speeds and volumes without reference to the place context are not adequate to determine if a street is “coping” or not “coping with impacts”.

2.1.6. Required Mitigation for issues raised in Section 2.1

TfNSW must address the following issues relating to the M8 Review and associated mitigation measures

The M8 Review

- **R1.1.** The M8 Review must demonstrate strategic alignment with Government Policy and Strategies
- **R1.2.** The M8 Review must measure performance against the full set of project objectives
- **R1.3.** Develop a road functional classification for the road network in the study area consistent with the Movement and Place framework. The Movement and Place surface road network should draw on the M8 EIS and Business case and the Government endorse strategic planning documents such as the TfNSW South East Transport Study (Aug 2020 road). The functional road hierarchy is the basis for determining the place and movement needs of road users on each street impacted or affected by the M8. Road users should include people walking, riding and catching public transport.
- **R1.4.** Provide a transparent and comprehensive assessment of road safety trauma within the study area using the most recently finalised five year data (preceding opening) and build up a post opening data set for the post opening assessment
- **R1.5.** Use existing agreed road safety trauma categorisation, and consider impacts on both local and state roads
- **R1.6.** Assess road safety trauma performance in collaboration with the City which has significant experience understanding how to apply the safe systems approach to the local road network

Mitigation measures:

- **M1.1.** Ensure the impact of vehicle volumes and speeds are consistent with the *function* of the road / street. These measures might include:
 - reducing vehicle speeds on local streets to 30km/hr
 - reducing vehicle speeds on surface state roads in the City LGA to 40km/hr
 - reallocating road space on streets/ roads who function has changed to have a higher place value for more trees, cycleway, parking or wider footpaths
 - additional crossing opportunities to make it easier for people to cross in high place location
 - providing longer walk time and reduce delays for people walking and riding to improve safety and amenity
 - provide red arrow protection for people crossing at green signals *across the entire study area*
 - removing slip lanes at signals near centres or high streets
- **M1.2.** Address road safety trauma mitigation measures in response to identified risks for all road user groups

The City has developed specific mitigation measures on Euston Road, around Alexandria and at Sydney Park Junction. These are discussed in Section 2.3.

2.2. The M8 Review does not adequately respond to the Consent Conditions

2.2.1. M8 Review fails to provide analysis of the pinch points created at the M8 exits inside the City LGA on Campbell Road / Euston Road and at Gardeners Road exit as required by Condition E40 (b) (i)

Consent Condition E40(b) requires “*further detailed investigations at the following intersections or sections of the road network ((i) potential ‘pinch-points’ where the merging of tunnel exit traffic and surface traffic would occur at the King Georges Road Interchange and the Saint Peters Interchange*”.

The design of the merge for vehicles exiting the M4-M5 and vehicles exiting M8 (north east from King Georges Road) prevents vehicles exiting the M8 from turning left at Campbell Street. This results in drivers exiting the M8 using Euston Road and Sydney Park Road circumnavigating Sydney Park to travel west back along the Princes Highway.

In basic terms, the M8 is funnelling vehicles from a Motorway around Sydney Park using local roads, these impacts have never been discussed with the City. These impacts are caused by poor merge design between M4-M5 and M8. The M8 Review fails to assess or even identify let alone address this issue.

Further, TfNSW never raised this issue during the development of the Sydney Park Junction project which is being implemented to reduce vehicle volumes and speed (and improve place characteristics) on King Street and Sydney Park Road. This is also inconsistent and not in keeping with Consent Condition B44 which requires that the proponent uses the outputs from the M8 Review in consultation with Council during the development of the Sydney Park Junction Project (formally known as the King Street Gateway Project).

2.2.2. M8 review fails to provide adequate information about the performance of key intersections as required by Condition E40(b) - (ii) , (iv), (vii), (viii), (ix), (xi) and E40(c)

Consent Condition E40(b) - (ii) , (iv), (vii), (viii), (ix), (xi) and E40(c), requires *adequate information about the performance of key intersections*, being:

- (ii) King Street, between Sydney Park Road and Enmore Road
- (iii) Euston Road, between Sydney Park Road and Botany Road
- (iv) Princes Highway and Campbell Street
- (v) Princes Highway and Canal Road
- (vi) Princes Highway and Railway Road
- (vii) Gardeners Road and O’Riordan Street
- (viii) Sydney Park Road and Mitchell Road
- (ix) Gardeners Road and Bourke Road
- (xi) Campbell Road and Euston Road.

The M8 Review does make statements about traffic volumes on Euston Road, partially addressing 40 (iii) condition. However, this does not constitute an assessment of intersection performance. The M8 Review contains no data relating to the performance review, nor does it provide any analysis.

When requested by the City, TfNSW did not provide any background analysis and data relating to the statements made in the M8 Review.

2.2.3. M8 Review fails to provide details on bus priority measures as required by Condition E40(d).

Condition E40 (e) requires details on bus priority measures. The M8 Review does not provide information about the performance of bus networks, or bus priority measures across the study area.

The M8 Review does propose changes at *one* intersection to address Councils request to improve bus performance. The M8 Review provides no justification for this mitigation.

The M8 Review has no analysis or data about bus network performance. Council requested access to all analysis and data. None was provided.

2.2.4. M8 Review fails to assess freight, public transport and active transport as required by Condition E40(f)

Condition E40(f) requires a comparison of the pre- and post-road network performance for all road users including, vehicles, freight, public transport and active transport. The M8 Review fails to provide meaningful consideration or assessment of freight, public transport and active transport.

The M8 Review provides detailed information about the performance of private vehicles, and some information about heavy vehicles. It would be incorrect for TfNSW to assert that heavy vehicles are a valid proxy for “freight”. While 10% of the vehicle fleet are heavy vehicles, performance of freight relates to rigid trucks and commercial vehicles and is a much larger group.

The M8 review does not address impacts of additional vehicle volumes at intersections and on local roads – especially for people walking and cycling.

The M8 Review has no analysis or data relating to freight, public transport and active transport. Council requested access to all analysis and data.

TfNSW WestConnex Integration Manager informed the City that: *“the collection of meaningful active transport data was hampered by the impact of COVID-19 during the analysis period. The data collected and analysed was limited to motor vehicle movements and the efficiency of the road network before and after the M8 was opened. We’ll be considering other transport modes as we work to develop mitigation strategies for identified traffic issues”* This approach is not consistent with the condition of consent requirement.

The City also disputes that meaningful collection of active transport data was hampered during COVID 19. The City partnered with TfNSW during COVID to deliver cycling improvements and pop - up cycleways. Significant data was collected as part of these trials. In addition the City reported unprecedented numbers of people walking and cycling during COVID due to lock down and the restrictions on the distance people could travel from their homes. *TfNSW should have collected data about people walking and cycling.*

2.2.5. M8 Review does not provide any assessment of “do minimum” performance, as required by Condition E40 (g).

Condition E40 (g) requires *justification of why the predicted ‘do minimum’ performance for any road users of any intersection on the adjoining road network cannot be maintained (if necessary).* *The M8 review provides no criteria for assessing “do minimum” performance, nor does it provide any analysis or data in the report.* Council requested access to all analysis and data. TfNSW provided none.

2.2.6. M8 Review fails to adequately develop mitigation measures, as required by Condition E40 (g). Mitigations were only provided for impacts identified through a flawed assessment

Condition E40 (h) requires *an updated description and proposed timing of potential mitigation measures, including measures to remove or limit any adverse impacts on any road user groups impacted by the M8.* Because of the shortcomings in the methodology used by TfNSW (as outlined in section 2.1), the assessment identified no impacts on people walking, cycling and using public transport (because TfNSW failed to consider these road users).

City of Sydney Response to:
M8 draft road network performance review (TfNSW)

Within the City of Sydney LGA, the methodology used by TfNSW only identified the intersection of Gardeners Road and Botany Road as warranting analysis. In addition, TfNSW only assessed delay to vehicles. TfNSW assessed that delays did not warrant any action.

TfNSW failed to assess wait times for people crossing either or both corridors. TfNSW did not consider road safety trauma and mitigation measures.

2.2.7. Required Mitigation for issues raised in Section 2.2

TfNSW must address the following issues relating to the M8 Review and associated mitigation measures

The M8 Review

- **R2.1** The M8 review must comply with *all* the conditions of consent rather than focussing only conditions that the TfNSW project manager considers relevant.
- **R2.2** The M8 Review must consider all road users when responding to the Conditions of Consent.
- **R2.3** The M8 Review must respond to Consent Conditions in a way that is consistent with the improved methodology discussed in Section 2.1.

Mitigation measures:

- **M2.1** TfNSW needs to re-assess the need for mitigation measures based on a proper assessment of outcomes for all road users at all intersections in the study area as required in the Consent Conditions
- **M2.2** TfNSW must transparently demonstrate to Council how results from an M8 review (consistent with consent condition E40) have been considered in the development of the Sydney Park Junction project – consistent with Consent Condition B44.

2.3. The M8 Review has not adequately addressed impacts of vehicle traffic redistribution.

2.3.1. The M8 Review has not addressed impacts of vehicle ‘rat runs’ on local streets through Alexandria

The City has a responsibility to respond to the needs of local people and places impacted by TfNSW decision to build and funnel traffic from western Sydney and the airport onto Euston Road.

The City provided data and analysis to support road closures and turn bans in and around Alexandria to prevent and reduce rat-running on local roads caused by M8 traffic heading north and west through Alexandria. The City worked with TfNSW to understand these issues over several years.

The M8 Road Network Performance Review Consultation Report (July 2022) and the M8 Review do not reference the City's *Erskineville and Alexandria Traffic and Transport Study* despite it being incorporated into the City's submissions.

The M8 Review has no analysis or data relating to the City's *Erskineville and Alexandria Traffic and Transport Study*.

2.3.2. The M8 Review has not addressed impacts of traffic routing via surface state roads to avoid tolls

The M8 Review is silent of the performance of the M8 and does not discuss road network issues associated with toll avoidance. The Transurban motorway network has well documented challenges with toll avoidance at key locations across Sydney such as Church Street in

City of Sydney Response to:
M8 draft road network performance review (TfNSW)

Parramatta, Parramatta Road in Strathfield and Marsh Street in Mascot. At each of these locations vehicles divert from the motorway onto local roads to avoid paying tolls. The results in more people using the “free” surface network, to avoid using the tolled high performing motorway network. The potential for this traffic induction generally far exceeds the minor projections TfNSW made in the EIS’s for these projects.

TfNSW provided the City with AM and PM peak vehicle volume counts at the intersection of Gardeners Road and Kent Street (the entrance to the M8 Motorway) , this data is not part of the M8 Review. TfNSW data show 25% of vehicles travelling west access the M8 from Gardeners Road, the remaining 75% of vehicles access the Princes Highway via Ricketty Street potentially travelling South to the M5 east, and avoiding the M8 toll. Heading east approximately 30% of vehicles on Gardeners Road exit from the motorway, the remaining 70% come from Ricketty road. The M8 Review does not access whether the volume of vehicles entering the M8 is consistent with EIS projects , or if fewer than expected vehicles are entering and then *choosing* to access the M5 - via the M5 East thereby avoiding tolls (and vice versus).

TfNSW have access to significant data and resources and could identify and quantify the scale of toll avoidance and the associated impacts on the surface road network. The failure of M8 Review to address the impacts of toll avoidance is symptomatic of TfNSW lack of accountability for realising the benefits of motorways. People are choosing to use surface streets rather than paying for a faster travel time.

2.3.3. Required Mitigation for issues raised in Section 2.3

TfNSW must address the following issues relating to the M8 Review and associated mitigation measures

The M8 Review

- **R3.1.** The M8 Review must identify and quantify the scale of toll avoidance and the associated impacts on the surface road network

Mitigation measures:

To minimise the impacts of motorway regional traffic using local roads in Alexandria, the City requests the following mitigation measures.

- **M3.1.** Maddox street and Harley Street at Euston Road should be closed
- **M3.2.** The western kerbside lane of Euston Road between Sydney Park Road and Maddox Street should be reinstated.
- **M3.3.** Sydney Park Road, between King Street and Mitchell Road - Replace signalised pedestrian crossing with wombat crossing
- **M3.4.** King Street, south of Sydney Park Road - Reduce the right-turn lanes from King Street into Sydney Park Road to a single lane of no longer than 40 metres (sufficient to serve local access requirements)
- **M3.5.** Maddox Street, between Euston Road and Mitchell Road - remove the unnecessary left- turn bay
- **M3.6.** Copeland Street / Mitchell Road / Fountain Street- TfNSW to modify intersection operation to avoid rat running via surrounding local roads.
- **M3.7.** Wyndham Street - TfNSW to modify intersection operation to reduce delays and avoid rat running via surrounding local roads.
- **M3.8.** Henderson Road - TfNSW to modify intersection operation at Copeland Street/ Mitchell Road/ Fountain Street to reduce delays and avoid rat running via surrounding local roads.
- **M3.9.** Barwon Park Road - TfNSW needs to reinstate two-way entry/egress at the Campbell Road/Barwon Park Road intersection and install traffic signals
- **M3.10.** To address the impacts of toll avoidance on local roads the current TfNSW Toll Review should consider reallocating surface street/ road space for cycling, walking, trees and public transport.
- **M3.11.** Review traffic management and directional road signage to be encourage drivers to use the bespoke motorway infrastructure and to minimise traffic on surface street network (especially local roads)

2.4. The M8 Review does not support its claims with data and TfNSW staff have not been forthcoming with information.

The M8 Review lacks supporting data, references, and models. Without this evidence TfNSW cannot validate its claims, and the M8 Review lacks credibility. Further, this demonstrates a lack of accountability within TfNSW.

Specifically the M8 Review is:

- **Unsupported:** It lacks sufficient empirical data, references to relevant sources, or any mention of analytical models.

City of Sydney Response to:
M8 draft road network performance review (TfNSW)

- **Unsubstantiated:** The findings presented in the report cannot be substantiated due to the absence of supporting data, references, or any reference to established models or frameworks. For example, Council has no way of validating TfNSW claimed travel time savings on King Georges Road or the decrease in Traffic on Princes Highway / King Street north of Campbell Road.
- **Incomplete:** TfNSW's decision to exclude assessment of public transport performance because it was heavily impacted by Covid and therefore unreliable is completely unacceptable. The City disputes and considers TfNSW decision to exclude active transport activity and therefore the collection of data because of COVID is unethical and unprofessional. The City and TfNSW partnered during COVID to double the City's cycleway network – and considers the impacts of COVID on active transport should have been documented by data collection to demonstrate the *substantially increase in participation rates*.
- **Non-scientific:** The report lacks scientific rigor, as it does not include any data-driven analysis, and switches between vehicle counts and percentages across a range of streets and roads without any context or source information.

2.4.1. TfNSW frustrated the City's attempts to verify the claims it made in the M8 Review

TfNSW statement of Business Ethics requires employees “*act ethically, transparently and honestly*”.

On 24th May, the City requested data and information to verify the claims that TfNSW made in the M8 Review

Over the next three weeks TfNSW officers sent the following packages of data on five separate occasions:

- 25th May - road safety crash summary reports and detailed reports for select roads
- 26th May - spatial presentation for Road safety crashes for City LGA
- 30th May - road safety summary analysis
- 2nd June – vehicle count data for three locations on Gardeners road
- 5th June – pre and post M8 opening slide pack for CoS (vehicle speed and volume data) and some additional vehicle count information

TfNSW did not provide Council with a complete set of supporting data or consultant reports. Rather, transport provided access to some raw data, and on each occasion City staff needed to review the data and identify missing data sets. TfNSW continued to provide incomplete responses.

TfNSW's failure to provide access to the requested information necessary to verify its claims is neither ethical, nor transparent, nor acting honestly.

2.4.2. TfNSW post M8 opening mitigation measures focus on capacity improvements and reducing delays to vehicles and defer or deflect using measures raised by Councils

TfNSW gathered feedback from Councils about potential mitigation measures. TfNSW M8 Council Submissions report identified Councils proposed:

- restrictions on heavy vehicle on local roads during peak times,
- investigating new pedestrian and cyclist links surrounding schools,
- reducing speed limits and clearways,
- review tolling and provide toll relief for local residents, and
- modifying intersection operations on main roads to discourage rat running in local roads. e.g reducing turn lane length/capacity , encouraging traffic to travel on state roads and roads identified as regional movement corridors using road signage.

City of Sydney Response to:
M8 draft road network performance review (TfNSW)

TfNSW *proposed* mitigation measures do not address Council requests. TfNSW measures are non specific , minor and defer any investment deflecting funding for a solution to other parts of TfNSW or being contingent on additional investigation, such as

“Improvements to support public transport efficiency and pedestrian safety. *Consider revision to speed limits at Rockdale Town Centre.*”

“*Does not meet study criteria* for M8 RNPRP however these initiatives are being funded through another Transport program.”

“A review of directional road signage to be undertaken with an aim to direct vehicles to use state roads *where appropriate.*”

The exception to this approach was an investment at Marsh Street and the M5 East ramps to “improve PM peak poor level of service”. There are no details about what this mitigation measures or its cost *but* Council is confident it will improve performance on and off the M5 East Motorway.

2.4.3. TfNSW engagement with the City did not meet the requirements of Consent Condition E40

This level of engagement that TfNSW undertook for this process does not meet the requirement of condition E40 to prepare the M8 Review in consultation with relevant Councils, and is an example of TfNSW culture of non-engagement and non-disclose and disregard for the views of local government.

TfNSW did not consult with CoS. TfNSW *informed* CoS about the scope and criteria for the M8 Review , CoS feedback has not been incorporated. The City made 6 recommendations in an email submission to TfNSW more than 12 months before the M8 Review was prepared, summary below.(City full submission attached Appendix B.)

- 1a. Assessment of connectivity, safety and comfort for people walking and cycling
- 1b. Assessment of impacts of WestConnex on high value places (or places with the potential to become high value
- 1c. Assessment of regional traffic movements using local / minor roads in the Alexandria area
- 1d. Include a scenario incorporating the impacts of King Street Gateway project when completed
- 1e. Include detailed investigation, including queue lengths of turning movements and impacts to active transport users due to change in signal phasing
- 2. Present the outcomes of the Road Network Performance Review Plan in a transparent and useable format

TfNSW did not adopt any of the City's recommendations.

TfNSW did not respond to numerous repeated request to provide the City with a timeframe for developing and producing the M8 Review. The M8 review has not been produced within a reasonable time frame of M8 opening, its has been nearly three years since the M8 opened. M8 Review input was requested in April 2022, the final report has still not been completed in June 2023. The three engagement touch points between the City and TfNSW for the M8 Review were limited and did not :

- July 2021- City proactively and pre-emptively engaged TfNSW to propose key elements that TfNSW should include in its M8 review. TfNSW provided no formal response or acknowledgement of City's input. See Appendix B email from S Smyth to M8 review team
- April 2022 – Cos provided feedback during the three week formal consultation process within the strict limitations of the “bang the table” engagement tool, and in a separate letter to the M8 review team.
- May 2023 - Current draft M8 Review consultation.

City of Sydney Response to:
M8 draft road network performance review (TfNSW)

TfNSW provided CoS with a copy of their engagement report “M8 Road Network Performance Review Consultation report July 2022” in October 2022.

2.4.4. TfNSW misrepresented City of Sydney input into M8 Review and failed to deliver the M8 review in a timely manner

Council feedback about TfNSWs engagement is:

TfNSW misrepresented or failed to document City’s feedback in the M8 Road Network Performance Review Consultation report July 2022 (published in October 2022)

- The City submission said “ The City has major concerns with the categorisation of issues incorporated into the *Bang the Table* tool (e.g. congestion, safety, accessibility etc). Requiring issues to be categorised under only one category works against the nuanced *movement and place* approach which recognises that in fact most issues relate to complex interrelationships between several or all of the categories. “ The City’s submission address 18 issues ranging from access for resident across the study area, to improvements in walking and cycling, changes to intersections and signals and reallocation of road space along Euston road.
- TfNSW said “ The City of Sydney expressed a range of concerns from safety and congestion through to active transport and road signage. This feedback included a request for Transport to direct traffic to state roads and discourage rat running on local roads as well as providing a local road environment at Sydney Park Road and King Street (Sydney Park Junction project)” TfNSW summarised issues against the Bang the table report despite the Citys objection to the format.

Required Mitigation for issues raised in Section 2.4

The M8 Review

TfNSW should provide all relevant supporting analysis and data used to develop the M8 review reports including reports prepared for TfNSW to support the M8 Review.

Specifically, TfNSW should provide the following data and analysis:

- **R4.1.** All vehicle count data across the entire study area
- **R4.2.** All road safety trauma data and a spatial mapping to understand the data
- **R4.3.** Modelled and measured travel time information to understand network performance
- **R4.4.** All consultants report used to prepared and support the M8 Review
- **R4.5.** The meeting minutes of discussion between M8 officers, the Centre for Road Safety and TfNSW Network and Safety team relating to road safety trauma data in the study area

Mitigation measures:

- None

Appendix A

New M5 Consolidated MOD 1 condition of consent E40:

At both 12 months and 5 years after the commencement of operation of the SSI, or as otherwise agreed to by the Secretary, the Proponent must prepare a Road Network Performance Review Plan in consultation with Transport for NSW and the relevant councils that includes:

- (a) an updated analysis, including modelling of traffic impacts to the adjoining road network (including impacts on local roads and rat-running), as a consequence of the SSI. This must include a review of new information available about potential land use changes, and any traffic changes as a result of other major road projects within the project area;
- (b) further detailed investigations at the following intersections or sections of the road network-
 - (i) potential 'pinch-points' where the merging of tunnel exit traffic and surface traffic would occur at the King Georges Road Interchange and the St Peters Interchange,
 - (ii) King Street, between Sydney Park Road and Enmore Road,
 - (iii) Euston Road, between Sydney Park Road and Botany Road,
 - (iv) Princes Highway/Campbell Street,
 - (v) Princes Highway/Canal Road,
 - (vi) Princes Highway/Railway Road,
 - (vii) Gardeners Road/O'Riordan Street,
 - (viii) Sydney Park Road/Mitchell Road,
 - (ix) Gardeners Road/Bourke Road,
 - (x) Unwins Bridge Road/Campbell Street, and
 - (xi) Campbell Road/Euston Road;
- (c) updated consideration of potential mitigation measures to manage any predicted traffic performance deficiencies in association with the investigations undertaken under (b);
- (d) the predicted traffic performance improvements from these measures, including any cumulative improvements;
- (e) details on bus priority measures;
- (f) a comparison of the pre- and post-road network performance for all road users including, but not limited to, vehicles, freight, public transport and active transport;
- (g) justification of why the predicted 'do minimum' performance for any road users of any intersection on the adjoining road network cannot be maintained (if necessary); and
- (h) an updated description and proposed timing of potential mitigation measures, including measures to remove or limit any adverse impacts on any road user groups impacted by the SSI.

The Proponent is responsible for the implementation of the identified measures, if required. The Road Network Performance Review Plan must be submitted to the Secretary, Transport

City of Sydney Response to:
M8 draft road network performance review (TfNSW)

for NSW (in relation to impacts on bus services) and to relevant council(s) within 60 days of its completion and made publicly available.

The purpose of the RNPRP is to optimise road network performance, including public transport access and times, and to manage the performance impacts of the SSI on the adjoining road network by identifying or confirming mitigation improvements that are required in areas where traffic performance may be unsatisfactory at time of construction being completed

Appendix B

Email sent from S Smyth to TfNSW 07/06/2021

The City notes that the Condition of Approval E40 requires the preparation of a **Road Network Performance Review Plan** ('Plan') at 12 months after the commencement of the operation of the M8. This Plan includes the following items of interest to City of Sydney:

1. Updated traffic modelling and analysis of the St Peters Interchange (SPI) portals and adjoining road network, including new information regarding land use changes and other major projects
2. Detailed investigation of the following sections of the road network:
 - a) 'Pinch point' assessment at the surface interface of the SPI tunnel portals at Euston Road, Campbell Road and Gardeners Road
 - b) King Street, between Sydney Park Road and Enmore Road
 - c) Euston Road, between Sydney Park Road and Botany Road
 - d) Princess Highway/ Campbell Road
 - e) Princes Highway / Canal Road
 - f) Gardeners Road / O'Riordan Street
 - g) Sydney Park Road / Mitchell Road
 - h) Gardeners Road / Bourke Road
 - i) Campbell Road / Euston Road
3. Updated consideration of potential mitigation measures to manage traffic deficiencies identified as part of the detailed investigation above
4. Comparison of the pre- and post-road network performance for all road users

It is the City's view that the scope of the **Road Network Performance Review Plan** is no longer fit for purpose or consistent with TfNSW's policy. Consistent with the purpose and approach of 'Evolving Transport', the City has developed a set of recommendations for consideration by TfNSW.

For Action: City's Recommendations

Recommendation 1: TfNSW should modify the scope of the Road Network Performance Review Plan to reflect current NSW Government policy and best practice relating to active transport, safety and place.

We note that the terms of the Condition of Approval are the product of the pervading attitudes of RMS at the time they were written, and that TfNSW has evolved considerably since then. For this reason, "detailed investigations of the road network" should include:

- **Recommendation 1a:** Assessment of connectivity, safety and comfort for people walking and cycling along and across the roads impacted by WestConnex (not limited to those outlined in 2 in "Background" above).
- **Recommendation 1b:** Assessment of impacts of WestConnex on high value places (or places with the potential to become high value) and options to mitigate impacts of increased traffic on these places. This should include:
 - a. Sydney Park Road: Reduction of the length of (Eastbound) turning lanes into Euston Road to maximum of 40 metre long
 - b. Sydney Park Road: incorporation 24/7 on-street parking interspersed with large street trees in the southern kerbside lane between Mitchell Road and Euston Road.

City of Sydney Response to:
M8 draft road network performance review (TfNSW)

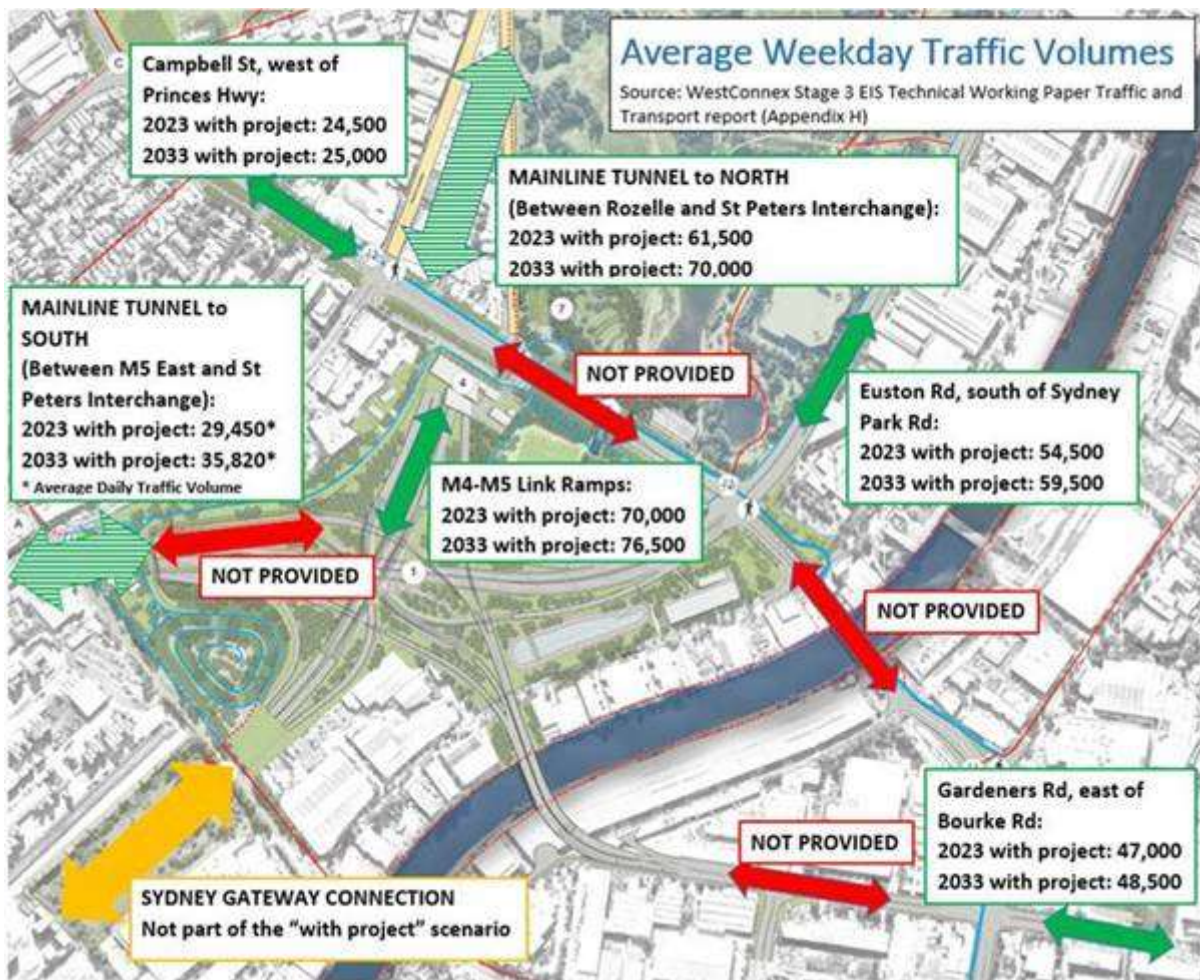
- c. Euston Road: re-instatement of the verge (north-western side) between Sydney Park Road and the point 50 metres south west of Maddox Street
- **Recommendation 1c:** Assessment of regional traffic movements using local / minor roads in the Alexandria area, including (but not limited to) Harley Street, Mitchell Road, Maddox Street
- **Recommendation 1d:** Include a scenario incorporating the impacts of King Street Gateway project when completed. This scenario should clearly identify the volume of the following movements:
 - a. From Princes Highway / Campbell Road to Euston Road / Sydney Park Road, via King Street and Sydney Park Road
 - b. From Princes Highway / Campbell Road to Euston Road / Sydney Park Road, via Campbell Road and Euston Road
- **Recommendation 1e:** Include detailed investigation, including queue lengths of turning movements and impacts to active transport users due to change in signal phasing, of:
 - a. Campbell Road / Bourke Road
 - b. Bourke Road / Gardeners Road
 - c. Gardeners Road / Kent Street
 - d. King Street / Sydney Park Road

Recommendation 2: TfNSW should present the outcomes of the Road Network Performance Review Plan in a transparent and useable format.

We note that the traffic assessment for the WestConnex Stage 2 and Stage 3, provided as part of the EIS's for the corresponding projects did not present a comprehensive picture of the projected traffic flows in road network surrounding the St Peters Interchange, as evidenced in **Figure 1**, below. This figure represents the information that the City was able to extract from the EIS Traffic Assessment and highlights major gaps even on roads immediately connecting to the interchange.

City of Sydney Response to:
M8 draft road network performance review (TfNSW)

Figure A1



Submission to TfNSW M8 Road Network Performance Review to 22/04/2022



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

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

26 April 2022

Our Ref: 2022/249476-03
File No: S112830

Network Integration M8 Motorway project team
Transport for New South Wales (TfNSW)
Sent via Email to: ni@transport.nsw.gov.au

Dear Sir/Madam

Subject: WestConnex M8 Road Network Performance Review Plan (M8 RNPRP)

The City of Sydney understands that Transport for New South Wales (TfNSW) is in the process of preparing the Road Network Performance Review Plan (RNPRP) for the WestConnex M8 Motorway as required by the Minister's Conditions of Approval (CoA) for the M8 Motorway (Conditions E40) at both 12 months and 5 years after opening.

TfNSW met with City of Sydney on 20 April 2022 to:

- Outline the scope and methodology of the [RNPRP](#)
- Present findings of analysis and locations identified for further [investigation](#)
- Seek feedback from council on how their community have been impacted by the opening of M8 Motorway
- Discuss potential mitigations to improve the transport network at impacted [locations](#)

TfNSW is also seeking feedback from the community using an online mapping tool, "Bang the Table" and have requested the [City](#) to provide their comments using this method.

The [City](#) has agreed to provide brief comments using Bang the Table, with detailed comments and traffic count data provided in this letter. The City's comments are provided below.

The City has major concerns with the categorisation of issues incorporated into the *Bang the Table* tool (e.g. congestion, safety, accessibility etc). Requiring issues to be categorised under only one category works against the nuanced *movement and place* approach which recognises that in fact most issues relate to complex interrelationships between several or [all](#) of the categories.

A handwritten signature in blue ink, appearing to read "Smyth".

Sebastian Smyth
Executive Manager City Access and Transport
City Access

City of Sydney Response to:
M8 draft road network performance review (TfNSW)

Issues incorporated into the engagement process

Reference	Location	Concern
Item A: Sydney Park Junction (previously King Street Gateway) road network:		
1	General	Sydney Park road should operate and look / feel like a local road. Reduce all traffic lane widths, delete and or reduce length of dedicated turning lanes.
2	Sydney Park Road, west of Euston Road	Reduce the left-turn and right-turn lanes from Sydney Park Road onto Euston Road to no longer than 30m.
3	Sydney Park Road, west of Mitchell Road	Reduce the left- turn lane from Sydney Park Road to Mitchell Road to no longer than 20m.
4	Sydney Park Road, between King Street and Mitchell Road	Replace signalised ped crossing with wombat crossing
5	King Street, south of Sydney Park Road	Reduce the right-turn lanes from King Street into Sydney Park Road to a single lane of no longer than 40 metres (sufficient to serve local access requirements)

Item B: Alexandria Local Area Traffic Management Plan (LATM) Study Area – the City is aware from traffic counts and/or resident complaints that traffic volumes have increased on the following local roads after opening of the M8 Motorway.		
6	General	TfNSW must ensure that the RNPRP considers and recommends solutions that discourage diversion of traffic onto local roads and regional roads due congestion and increased travel times on the state roads as a result of the M8 Motorway.
7	Mitchell Road	<p>Avoid / discourage traffic travelling south using Mitchell Road (local road) from Euston Road (state road). TfNSW to encourage traffic to use Euston Road and continue via Campbell Road to Princes Highway, including adding directional signage to Princes Highway for this route.</p> <p>Avoid / discourage traffic travelling south using Mitchell Road (local road) and Sydney Park Road to get to King Street (state road). TfNSW to encourage traffic to use McEvoy Street/Euston Road and Campbell Road instead.</p> <p>Avoid / discourage traffic travelling north using Sydney Park Road and Mitchell Road to get to Henderson Road (regional road) north of Copeland Street (adjacent to two school precincts). TfNSW to encourage this traffic to use Euston Road and Fountain Street (state roads) instead.</p>
8	Maddox Street, between Bourke Road and Euston Road	Avoid / discourage traffic travelling between Mitchell Road (local road) and Bourke Road via Maddox Street. TfNSW to encourage this traffic to use Gardeners Road (state road) and Euston Road (state road), Botany Road (state road), or O’Riordan Street (state road) instead.

City of Sydney Response to:
M8 draft road network performance review (TfNSW)

9	Remove slip lane Euston Road into Sydney Park Road	Remove slip lane Euston Road (North bound) into Sydney Park Road (Westbound). This movement-focussed design will not be compatible with the local road that Sydney Park Road will become and impacts on the safety and amenity for people walking to this regional park / recreational facility. See Attachment A
10	Reinstate western verge of Euston Road between Sydney park Road and Maddox Street	TfNSW to reinstate the western verge of Euston Road between Sydney park Road and Maddox Street (that WestConnex removed to provide an additional northbound traffic lane / left turn bay into Maddox Street). This is unnecessary as a traffic measure as there are only two northbound lanes on Euston Rd north of Maddox Street. If TfNSW insists on retaining a left turn into Maddox street, it should be no longer than 30 metres long. Re-instatement of the verge is a critical requirement for residential activities and place along this section of road, and should accommodate significant street planting. See Attachment A
11	Maddox Street, between Euston Road and Mitchell Road	Avoid / discourage traffic using Maddox Street (local road) and Mitchell Road (local road) instead of Euston Road (state road). Left-turn turn bay on Euston Road (state road) into Maddox St (local road) encourages more traffic. TfNSW needs to remove the unnecessary left- turn bay and reinstate the western verge on Euston Road between Sydney Park Road and Maddox Street (as outlined in comment #10)
12	Copeland Street / Mitchell Road / Fountain Street	Traffic through this intersection has increased (state road route), causing congestion that encourages drivers to seek alternate routes along local roads. TfNSW to modify intersection operation avoid rat running via surrounding local roads.
13	Harley Street, from Mitchell Road to Euston Road	Avoid / discourage traffic travelling between Sydney Park Road and Mitchell Road (local road) via Harley Street (local road) instead of Euston Road (state road). The City is constructing a new cycleway on Harley Street and so TfNSW needs to discourage through traffic as much as possible on this local road.
14	Wyndham Street	Increased traffic volumes at intersection of Wyndham Street (regional road) and McEvoy Street (state road) and increased congestion causes traffic to seek alternate routes along local roads. TfNSW to modify intersection operation to reduce delays and avoid rat running via surrounding local roads.
15	Henderson Road	Avoid / discourage traffic travelling along Henderson Road (regional road) instead of Fountain Street (state road) because of increase traffic build up especially at intersection of Copeland Street / Mitchell Road and Mitchell Road / Fountain Street. TfNSW to modify intersection operation at Copeland Street / Mitchell Road / Fountain Street to reduce delays and avoid rat running via surrounding local roads.

City of Sydney Response to:
M8 draft road network performance review (TfNSW)

16	Bourke Road, north of Campbell Road bridge	Avoid / discourage traffic using Bourke Road (local road) via Campbell Road Bridge. TfNSW to encourage traffic to use Euston Road (state road), Botany Road (state road), or O'Riordan Street (state road) instead.
17	Coulson Street	Avoid / discourage traffic travelling between Alexandria and King Street using Coulson Street (local road) as an alternative route to access King Street as Mitchell Road traffic builds up. TfNSW to encourage through traffic to use Euston Road and Campbell Road (state roads) so Mitchell Road and Sydney Park Road are mainly used by local traffic.
18	Barwon Park Road	Concerns over limited access for residents and visitors to the Park. TfNSW needs to reinstate two-way entry/egress at the Campbell Road/Barwon Park Road intersection and install traffic signals

Attachments:

- **Attachment A:** Sketch of Euston Road lane reduction, south of Maddox Street (<https://record.cityofsydney.nsw.gov.au/2022/249476-04.ref>)
- **Attachment B:** Traffic count data collected for the Alexandria LATM in 2016 and for the Alexandria (<https://record.cityofsydney.nsw.gov.au/2022/249476-05.ref>)

City of Sydney Response to:
M8 draft road network performance review (TfNSW)

City of Sydney Response to:
M8 draft road network performance review (TfNSW)

