STEP Inc

Community-based Environmental Conservation since 1978

STEP Submission to the Review of the F3 to M7 Corridor Selection, April 2007

Introductory Comments

STEP Inc. is a local community and environment group which was established in 1978. It's interests include all aspects of the local environment including planning for sustainability, preservation of urban bushland and a range of education initiatives for local schools. It has more than 500 members with the majority coming from Hornsby and Ku-ring-gai.

Background

STEP made submissions to the study conducted by Sinclair Knight Merz (SKM) in 2004, on behalf of the Federal Government, of the proposal for a link from the F3 to the M2 motorway. STEP's position paper on this matter can be found at STEP's website *www.step.org.au/F3M2_position.htm*

This submission is a response to the independent Review of the F3 to M7 Corridor Selection, announced on 19 February 2007 by The Minister for Local Government, Territories and Roads, the Hon. Jim Lloyd MP, to be conducted by the Hon Mahla Pearlman AO, former Chief Justice of the NSW Land and Environment Court (1992 – 2003)

The Terms of Reference for the Review are as follows:

Giving due consideration to the information in the *Interim Report – F3 to Sydney Orbital Corridor Review March 2006*, consider and advise on:

- whether the assumptions and data used in the *F3 to Sydney Orbital Link Study 2004* were valid and reasonable at the time of the study;
- whether changes since the report's publication affecting land use and transport flows in Western Sydney would support any significant changes in these projections; and
- whether any significant changes to those projections would alter the conclusions reached in the *F3 to Sydney Orbital Link Study of April 2004*

Submissions should address the Terms of Reference of the Review and must comply with the Submission Guidelines.

PO Box 697, Turramurra NSW 2074 www.step.org.au secretary@step.org.au

ABN 55 851 372 043

STEP's Response

1. Interim Report – F3 to Sydney Orbital Corridor Review March 2006:

The purpose of this Interim Review, as set out in its Terms of Reference, was to compare the SKM report and a submission made by Transurban, the operator of the M2 motorway, and assess and provide independent comment, evaluation and advice in relation to;

- the discrepancies in traffic forecasts and distributions by SKM and Transurban
- reasons for the reported differences in traffic forecasts made by SKM and Transurban
- toll revenues of the two options and the difference in Government contribution required
- modelled traffic relief, particularly on Pennant Hills Rd
- feasibility of a Type C western option in comparison to the Purple and the Yellow options against the F3 – Sydney orbital route selection objectives

The consultant, Masson Wilson Twiney, who conducted that interim review concluded, among other things, that;

- A Type A option is needed now
- In spite of some differences in assumptions and data between SKM and Transurban, the Purple option is still preferable to the Yellow option, which was promoted by Transurban (it feeds into the M2 toll road in both directions)
- There would be insufficient traffic demand in 2021 to support a major new alignment, such as a Type C option.
- A Type C alignment would provide only small traffic relief in the Pennant Hills Rd corridor
- Beyond 2021 the viability of a Type C option would depend on the way Sydney, the Central Coast and Lower Hunter develop.

STEP's View

STEP maintains that in the absence of an integrated transport study the need for additional road space cannot be established, but if additional road space is to be developed the only option that could serve the transport function, rather than just short term commuter demand, is the purple Type A option. We also assert that by 2021 the cost of fuel, rising in response to dwindling supply and increasing international demand, will also strongly restrict demand for a Type C option. In any event we believe that the consultants have overstated the relief that a C option would bring to Pennant Hills Road. We believe that any relief would be negligible and brief in duration because any lessening of congestion will induce additional traffic. Pennant Hills Road is therefore destined to remain at least as congested as it now is.

2. Assumptions and Data used in the F3 to Sydney Orbital Link Study 2004

No new data that we are aware of has been published since the above study was completed in 2004, and the assumptions used are therefore no more or less valid today than they were in 2004.
The information provided by Transurban for the Interim Review mentioned above only relates to toll maximisation, not transport improvement.

STEP's View

STEP maintains that additional road space will inevitably result in an enormous amount of induced traffic causing renewed traffic congestion. To prevent this traffic build up reverting to Pennant Hills Rd the latter should be reduced to two lanes each way, with traffic management more friendly to the immediate neighbourhood.
We also assert that the real solution to transport problems between Sydney metropolitan and the Hunter via the Central Coast is investment in public transport infrastructure, both freight and passenger, to get the cost and convenience balance to favour rail freight and rail travel against road freight and private car travel. It would also ease the pressure on the M7 as a by-pass for the Sydney region and Pennant Hills Rd as a traffic sewer.

3. Changes since the Report's Publication affecting Land Use and Traffic Flows in Western Sydney that would support any Significant Changes to these Projections

The opening of the M7 Tollway has induced further traffic demand and thereby aggravated the pressure on the Pennant Hills Rd corridor as the next bottleneck to traffic, but this was predictable.
We are not aware of other significant changes.

STEP's View

STEP previously highlighted that experience showed that any additional road space induced large increases in traffic demand and that the 2002—2004 study did not adequately address that aspect. We believe that, in the absence of adequate leading investment in public transport, additional road space will always cause increased traffic demand and that this has been demonstrated in the case of the M7 and will undoubtedly be shown if this new link is developed.
The only positive benefit to be derived from the purple option would be the reduction of heavy through traffic on Pennant Hills Rd., but only if appropriate measures are taken to return to a neighbourhood-friendly road space, ie. reduced speed limit, reduced lanes, better access and better cross flow provisions.
Unfortunately increased road space also entrenches land use decisions, based on private vehicle use and road based freight traffic, which are more energy intensive and more polluting, and which are difficult to reverse and adapt to a public transport future .

4. Any Significant Changes to those Projections that would Alter the Conclusions Reached in the F3 to Sydney Orbital Link Study of April 2004.

Apart from the increased traffic generated through the opening of the M7 Tollway there are no significant changes to the projections, which would alter the conclusions. However a change of major significance is the growing realisation that global climate change and peak-oil will have profound effects on future transport developments beyond the immediate horizon considered by the study.

STEP's VIEW

We reiterate that in the absence of an Integrated Transport Plan the conclusions reached in the F3 to Sydney Orbital Link Study of April 2004 cannot be held to be valid.
We assert that if a road could be seen as an adequate solution to a transport problem, then the purple option would be appropriate provided that:

- the tunnel is adequately ventilated, and
- the ventilation exhausts are scrubbed and filtered to eliminate CO2, NOX, and particulates, and
- adequate safety provisions are incorporated such as fire isolated access for emergency and evacuation, as well as in situ fire fighting systems, and
- Pennant Hills Rd is returned to neighbourhood traffic by reduction of speed limit and lanes and better cross flow management.

These provisions would be absolutely essential, since this tunnel would be expected to carry all manner of road freight as part of the national highway.

SUMMARY OF STEP'S POSITION

As mentioned above, STEP Inc. made a submission in June 2002 to the F3 to Sydney Orbital Study opposing the link road proposal because, in the absence of an integrated transport plan based on a study of the total Sydney transport requirements, all projects which had been undertaken in the past were purely ad hoc solutions to perceived "missing link" situations. There has been no consideration for the larger picture and the influence of these road solutions to the development of land use in the metropolitan area, the Central Coast and beyond.

The 2002 submission and subsequent comments were:

- Additional road space results in further induced traffic which quickly defeats the short term gains in travel times and generates increased car dependence. The link would encourage unsustainable travel patterns and dispersed development in the Central Coast area, thereby exacerbating current problems. Increased road travel increases pollution both at local level as well as in global climate terms.

- Above ground Type A options are not acceptable since they destroy bushland and thereby the very amenity which makes Sydney and environs liveable. Tunnel options create problems, especially where it is necessary to cater for all freight as well as other traffic.

- A Western Type C option is inappropriate and not acceptable. The imperatives of global warming and approaching peak-oil mean that such major road projects cannot be justified. In addition, such a road would have to traverse national park property and would produce enormous undesirable demographic changes.

- Such "missing link" road solutions swallow large amounts of capital which would be more appropriately directed to long term public transport infrastructure within the context of an integrated transport plan for the State of NSW.