

To: The Chair
Review of the F3 to M7 Corridor Selection

From: Pennant Hills District Civic Trust Inc. and others.

Subject: **Review of the F3 to M7 Corridor Selection**

This **Submission #2** is made on behalf of the members of the Pennant Hills District Civic Trust Incorporated and the local community including all those local residents listed in Attachment A.

The Trust is an association of concerned residents that aims to preserve the qualities of the area, to improve the amenities of the area and to provide a community voice to achieve these aims.

This submission focuses on the **Context** of this Review, specifically considering the fact that the Terms of Reference are preceded by the following:

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

and Minister Lloyd’s Media Release (19/2/07) reference to this report as containing “information central to the Review”.

With the significance of this report having been established it is important that we make the following representation to the Review. For reasons of simplicity we will refer to the above as the **MWT review and report**.

A. The **HISTORY** of the MWT review and report is as follows:

1. January 2006. Minister Lloyd “agreed to an independent review of the traffic forecasts used by SKM and Transurban in reaching their respective conclusions about the Yellow and the Purple Options and the reasons for any discrepancies”.(ref. MWT Report Preface by DOTARS dated 16/02/07)
2. February 2006. The MWT review was re-announced by The Hon Philip Ruddock MP claiming (a) that Minister Lloyd had called for this review following representations from Mr Ruddock on behalf of constituents and local interested organisations and (b) that the MWT review would “result in reconsideration for a new link between the F3 and the M7 currently provided by Pennant Hills Road”. (ref. Ruddock Media Release dated 22/02/06).
3. March 2006. Minister Lloyd confirmed that the MWT review “will provide an additional level of scrutiny of the analysis of the Purple and Yellow Options within the type ‘A’ corridor”, thereby denying the broad reconsideration implied in Mr Ruddock’s media release. (ref. Lloyd correspondence dated 8/03/06).

4. March 2006. The MWT review report was issued on 22/03/06, including a section titled Type C Options which was not included in the review only 14 days prior.
5. June 2006. In response to two separate enquiries Minister Lloyd advised that the MWT report was “yet to be finalised” and “to be completed shortly”, and yet it is dated 22/03/06.
6. February 2007. The MWT report was released in conjunction with the Independent Review announcement. The report is still titled “interim” so those aspects yet to be completed in June 2006 are still outstanding. However in spite of being incomplete Minister Lloyd claims that this report “contains information central to the review” (ref Minister Lloyd’s media release dated 19/2/07).

Questions:

Can both 1 and 2 above be true?

Can the difference between 2 and 3 above be explained?

How can 4 above be so if Type C options were excluded 14 days earlier in 3 above?

How can 5 above be explained?

If the MWT review was undertaken in response to Mr Ruddock’s representations on behalf of constituents, why did it take 11 months to release it to the public?

The MWT report shows the RTA as the ‘client’. Was there a tendering process conducted prior to the RTA commissioning MWT?

What is the history of the RTA/MWT association?

With the MWT report being primarily a Purple/Yellow options comparison, what is the information in the MWT report that is considered central to the Review?

With the MWT report still being an ‘Interim Report’, what has still to be completed and when will it be completed?

Why, in the appendices to the MWT report, is there an addition ahead of Appendix A? Why was there a need for the two documents and why the differences between them, for example between the ‘purpose’ in the addition and the ‘objectives’ in Appendix A?

B. The MESSAGE in the MWT Report is as follows:

Although the initial purpose of the MWT review was narrow (*to understand the reason for discrepancies between SKM and Transurban traffic forecast for the Purple and Yellow options*) the messages emanating from the MWT report have a broad application.

The MWT Report tells us:

1. that the discrepancies between the traffic forecasts were significant, by definition, **but** we are not told any details.

2. that the Government was prepared to pay \$20000 consultants fees to have the reasons for the discrepancies explained, **but** obstructed a member of the public from accessing documents relating to the SKM modelling under FOI with a \$20000 charge.
3. that different modelling software was used **but** there is no comment as to pros and cons of the two packages, **nor** is there any comment as the extent and effectiveness of the modelling exercised.
4. that SKM used Trip Tables, Land Use Forecasts and Public Transport Assumptions inputs that were available at the time **but** all three have been updated since with the result that SKM forecasts are understated, and there is **no** any comment on the effect of the Metropolitan Strategy in December 2005, surely a significant land use change that should be considered.
5. that there is no consideration of actual traffic numbers **so** the opportunity to test growth rate assumptions has been ignored. Surely this is a vital input factor.
6. that the SKM Road Network Coding was for three lane each-way tunnels **but** their final recommendation is for two or three lane each-way tunnels dependent on tolling decisions **and** there is no indication that SKM have modelled the two lane each way tunnel alternative. This is particularly significant considering that SKM network assumptions do include Pennant Hills Road being reduced to two lanes in each direction. Evidence of the modelling of the combined four lanes each-way must be produced and independently verified..
7. that the SKM tolling approach lacks sophistication, with one identified weakness being the lack of route choice modelling by vehicle class, which is consistent with earlier SKM reporting which indicated that their model does not directly treat heavy vehicles, **but** this is particularly critical considering heavy traffic component on Pennant Hills Road.
8. that “there is a risk that options which optimise toll revenues may not provide optimal societal welfare”, **but** there is no attempt to explore the community impacts presumably because this was outside the scope of the MWT review. **But**, for these considerations to be similarly excluded from the Independent Review is a major failure of community representation..
9. that Pennant Hills Road is the major north/south freight corridor (75% in mass terms) **but** where is the evidence that the coincidence of long tunnels and a major heavy vehicle traffic component has been effectively, convincingly modelled.
10. that ‘the bulk of Sydney is too remote from a Type C connection to be well served by a Type C option’ **but** reports that 87% of freight traffic currently moving via the

Pennant Hills Road corridor is moving to or from the Western Sydney regions **and** that the progressive location / relocation of Sydney's manufacturing, warehousing and transport industries for proximity to the National Highway (M7) is certain.

11. that MWT supports the Type A option **but** at the same time poses the problem of "access to a type A option" and puts forward parallel route opportunities within the Sydney road network as necessary to support this option.
12. that MWT accepts that the F3 will be overloaded in peaks by 2021 which means an effective term of 6-7 years from tunnel build completion in 2014/5 **but** claims this to be a viable "medium to long term" option..
13. that MWT's 'medium to long term' claim will require the implementation of 'tactical' measures **but** is this consistent with Auslink funding of projects which make it quicker and cheaper to transport freight around the country.
14. that a Type C Corridor is one of only two long term options **but** their arguments against the 'eight lane F3' option are compelling.

Conclusion

The **History** of the MWT Review and Report raises matters of misrepresentation and the use of improper process.

The **Message** from the MWT Review and Report is that, while starting as a comparative exercise between SKM and Transurban analyses of the Purple and Yellow options, this exercise has been manipulated to justify the Purple option against **all** other options.

The analysis above demonstrates mixed messages and raises a whole series of issues concerning the Link Study but MWT proceeds to dismiss them on the 'swings and roundabouts' principle rather admit the justification for a total reassessment consistent with the Auslink approach of long term strategic planning and funding.

At another level, and referring again to Minister Lloyd's remark in his Media Release (19/2/07) that the MWT report was central to the Independent Review, we see this Report as being used to secure the defence of the Government's decision. The Government, having reluctantly agreed to an inquiry into their F3/Sydney Orbital Link decision, have framed the Terms of Reference to make it near impossible for the effected community to participate in the Review and have tied the Terms of Reference to an 'independent' report that is conveniently available to assist the inquiry or review process to reach a predetermined result. This is seen as the use of improper process.

For all these reasons and all the points and questions raised in this submission we object to the Independent Review as set up and we call for a proper open judicial inquiry.

Attachments

The following are to be considered as attachments to this submission:

1. The Register of Objectors (provided with our Submission #1) is provided as evidence of our representation of the effected community.
2. The Trust Membership list (provided with our Submission #1) is provided as evidence of our bona fides as a community organisation
3. The Public Notice posted with the Monthly Chronicle, a local newspaper covering the Pennant Hills Road suburbs effected (provided with our Submission #1).