



# INDEPENDENT TOLL REVIEW

## 2024 Public Consultation

---

Submissions to the Interim Report

July 2024

# Consultation on the Interim Report

---

## Have Your Say

We invited the public and all interested parties to respond via a HYS portal, a NSW Government online platform that supports consultation related to government projects, services, and policies.

The Review received 117 written submissions. 92 submissions from the general public and 25 submissions from academics, think tanks and private consultants, toll road operators, associations and member organisations including:

- Aboriginal Legal Service (ALS)
- Action for Public Transport (APT) NSW
- Australian Super
- Bexley Chamber of Commerce Inc
- BMW Touring Club NSW
- Business Council of Australia
- Committee For Sydney
- Global Listed Infrastructure Organisation (GLIO)
- Infrastructure Partnerships Australia (IPA)
- Intelligent Transport Systems (ITS) Australia
- Jim Australian Pilot Vehicle Drivers Association
- Motorcycle Council (MCC) NSW
- NorthWestern Roads Group
- NSW Toll Road Partners
- Philip Laird (UoW)
- Queensland Investment Corporation (QIC)
- Roads Australia
- RB Consult
- Tolling Customer Ombudsman
- Transport Workers Union
- Transurban

Four stakeholders wished for their submission to remain confidential.

The HYS portal for tolling was open between 11 March 2024 and 30 April 2024 with a series of questions grouped into themes, most of which were optional. The respondents also had the option to submit a response by attaching a separate written submission. They were encouraged to structure their submission with reference to the findings and recommendations tabled in the Interim Report.

The questions covered topics such as: price reform (network tolling), the State Tolling entity structure and functions, IPART's role in reform, determination of tolls, competition and regulation, tolling principles, toll relief and improving motorist experience.

# Aboriginal Legal Service (ALS)

Stakeholder Submission

1 May 2024

Independent Toll Review

NSW Treasury

By email: [tolling\\_pmo@transport.nsw.gov.au](mailto:tolling_pmo@transport.nsw.gov.au)

**Re: Submission on the Independent Toll Review**

I write on behalf of the Aboriginal Legal Service (NSW/ACT) Limited (**ALS**) regarding the NSW Government's Independent Toll Review.

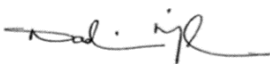
The ALS is a proud Aboriginal community-controlled organisation and the peak legal services provider to Aboriginal and Torres Strait Islander adults and children in NSW and the ACT. More than 280 ALS staff members based at 27 offices across NSW and the ACT support Aboriginal and Torres Strait Islander people through the provision of legal advice, information and assistance, and court representation in criminal law, children's care and protection law, civil law and family law. This feedback was informed by the expertise of solicitors in our Civil Law Practice, including our Fines Clinic—which helps Aboriginal and Torres Strait Islander people across NSW to deal fine debt including penalty notices and unpaid toll debts.

The ALS is supportive of simplified and consistent communications to motorists, and for fees and charges to be transparent and reflective of the actual costs incurred as suggested in the Proposed New Tolling Principles. In our practice's experience, communication regarding toll debts can be confusing and overwhelming for clients, especially when they are also dealing with similar communications from Revenue or other debt collectors. We support the recommendations made in the Interim Report and in particular Recommendations 1, 5, 14 and 28 – 31.

There is a need for clarity around the factors that determine whether overdue toll fees are treated as fines or referred to debt collection agencies. In our practice's experience, Revenue NSW often facilitates clearer communication and provides greater transparency for road users regarding unpaid tolls compared to the Linkt civil debt recovery process. We recommend the toll process is refined to ensure greater transparency for all clients with toll debts. Further, we recommend any proposed pricing restructures ensure hardship options are available to clients alongside any proposed pricing restructures, with clear information provided to motorists.

We note the Summary Paper raised the possibility of disincentivising non-compliance of unpaid tolls (pp. 41 – 42). While we are unable to provide comprehensive feedback on this proposal without more information, if such a proposal were pursued that considerations should be made for clients experiencing significant hardship, as traditional enforcement measures would not be effective in these cases.

Sincerely,



**Nadine Miles**

**Principal Legal Officer**

Aboriginal Legal Service (NSW/ACT) Limited

# Action for Public Transport (NSW) Inc.

## Stakeholder Submission



# Action for Public Transport (N.S.W.) Inc.

P O Box K606  
Haymarket NSW 1240  
30 April 2024

Independent Toll Review  
NSW Treasury  
Submitted via website <https://www.nsw.gov.au/have-your-say/toll-review>

## Submission on interim report of Independent Toll Review

### Who we are

Action for Public Transport (NSW) or "APTNSW" is a transport advocacy group which has been active in Sydney since 1974. We promote the interests of beneficiaries of public transport - passengers and the wider community alike.

### Discussion

Our basic position with respect to tollways is that they are inimical to the development of good public transport. Public transport works best when focussed on dense centres. Decisions to build tollways are generally based on the opportunity for the builder to make a profit on the deal by charging traffic. They invariably bypass the centres (Hurstville, Chatswood, Parramatta, Blacktown, ...) which define the structure of Sydney's older suburbs. This weakens those centres. Instead, tollways facilitate rapid trips between points remote from all centres.

While the fact of their toll mitigates the effect somewhat, there can be no doubt that Sydney's tollways increase the kilometres travelled by private transport (and the present Review agrees - see finding 15 and recommendation 5). Our view is that they generally decrease public transport patronage. Contrariwise, the M2 is reportedly protected by contract terms against loss of patronage due to, *inter alia*, competition from new public transport services. However it is not clear whether opening of the railway to Tallawong triggered any consequences arising from those terms.

We would also like to make some comments that don't have any obvious connection to public transport.

### Hands are tied

The interim report notes that changing any aspect of tolls on Sydney's many privately-owned toll roads can't happen immediately and probably can't happen until each road's concession period expires. This extends to tweaks such as reducing tolls outside peak hours although perhaps not to changing cashback arrangements. However, no such difficulty applies to imposing new tolls on other roads. In fact, concession holders could expect increased patronage if parallel routes ceased being free.

The present Review's function is to find courses of action that would make things better. There is no need to limit the Review to the constraints of existing contracts or government policies (but we concede that s.90 of the Constitution won't change). The Review should feel free to recommend toll structures that reduce congestion, for example, even if those structures are inconsistent with pre-election promises.

### State TollCo(m)

We think that this body could play a vital role in planning Sydney. Among other things, it could affect the attractiveness of public transport by making competing car trips more costly in time or money. We suggest it should be under close government control and perhaps should be set up as State TollCom rather than looking like something that's supposed to make a profit. One of its important functions will be educating the public on why there should be tolls on some roads that aren't tolled already; profit-making bodies are unconvincing moralists.

### SHB/SHT/ED tolls

The review suggests making the tolls apply to both directions of travel. Two remarks:

- The SHB toll on northbound traffic was lifted in 1970, well before toll tags and automatic number plate recognition ("ANPR") were available. This change meant that northbound vehicles did not have to stop at the toll barrier, saving collection costs and helping reduce congestion delays. However, the amount collected was simultaneously doubled from 10¢ to 20¢. The present Review models adding a toll to northbound trips of the same amounts as currently charged southbound; such a move would be widely perceived as a doubling of tolls.
- Levying tolls on northbound SHB/SHT traffic would provide some immediate relief to congestion of Victoria Rd inbound through Drummoyne. Most would agree that this relief is needed.

## Looking ahead

Notwithstanding government policy, the present Review seems to accept the position of Professors Hensher and Levinson that new tolls should one day be imposed on existing streets that parallel tollways. We agree; it's called road access pricing. The Review should look into how best this might be accomplished and when.

Although road access pricing has been ruled out from time to time, it is on its way. It was foreshadowed by Fletcher<sup>1</sup> as discussed by Gittins<sup>2</sup>.

## Declining distance-based pricing

One of the functions of State TollCo will be processing gantry data in order to identify long trips and levy tolls accordingly. This will presumably involve making assumptions that will sometimes be quite wrong, causing some drivers to be debited for more than they would expect. We suggest it would be easier, and would yield very similar results, to charge a lower amount per kilometre in the western suburbs (west of Lidcombe) than in the east. The quote from the TWU submission reprinted on page 106 of the interim report clearly shows the close relation between longer trips and trips in the western suburbs:

*The distance-based methodology does not account for the fact that Western Sydney motorists live further out from central locations, and as such, are required to travel upon the full gamut of tolled roads and pay the maximum associated toll charge in order to access their destination. In effect, charges calculated via the distance-based methodology punish motorists living, working or frequently travelling to, from and throughout Western Sydney.*

This punishment is unnecessary and should not happen.

## NYC

Tolls on vehicles entering Manhattan via certain routes come into effect in a few weeks' time. Interestingly, electric vehicles will at first be exempt from the new tolls. The present Review could usefully examine these new tolls and compare them with what is envisaged for Sydney.

## Evading ANPR

We understand that ANPR is widely used in USA when levying tolls. To evade the tolls, a surprising number of vehicles are fitted with fake number plates (or none at all). A small industry has sprung up supplying devices that the driver can activate to conceal a car's number-plate. Some of these devices are available on E-bay<sup>3</sup>. The Inquiry should confirm that our electronic tags are more difficult to falsify.

Jim Donovan  
Secretary  
Action for Public Transport (NSW) Inc.

---

## References

<sup>1</sup>[http://podcast.thesydneyinstitute.com.au/podcasts/2016/THE\\_SYDNEY\\_INSTITUTE\\_PAUL\\_FLETCHER\\_16\\_AUGUST\\_2016.lite.mp3](http://podcast.thesydneyinstitute.com.au/podcasts/2016/THE_SYDNEY_INSTITUTE_PAUL_FLETCHER_16_AUGUST_2016.lite.mp3)

<sup>2</sup><https://www.smh.com.au/opinion/ministers-suggestion-of-new-road-user-charge-may-seem-outrageous-but-it-makes-sense-20160920-grk1bc.html>

<sup>3</sup><https://www.ebay.com.au/itm/176254211155>

# Australian Super

## Stakeholder Submission



14/05/2024

Independent Toll Review  
Treasury  
NSW Government  
[tolling\\_pmo@transport.nsw.gov.au](mailto:tolling_pmo@transport.nsw.gov.au)

## **Re: Independent Toll Review - Interim Report - May 2024**

AustralianSuper welcomes the opportunity to provide an investor perspective on the Interim Report into Sydney's Toll Roads.

AustralianSuper is Australia's largest superannuation fund, with over 3.4 million members, and over \$335 billion in member assets under management. Our purpose is to help members achieve their best financial position in retirement.

Around half of members' retirement savings managed by AustralianSuper is invested in Australia. AustralianSuper invests around \$44 billion in listed and unlisted assets in NSW, including holding an equity stake in WestConnex. The long-term investment horizon for unlisted infrastructure assets is aligned with the investment horizon of AustralianSuper and with delivering on our purpose for members.

### **Support for the objectives of the Review**

AustralianSuper agrees that through successive governments, the passage of time and the changing demographics of Sydney, a fragmented toll road network has evolved. We support the Government's desire to achieve the principles of efficiency, fairness, simplicity and transparency of tolls, while ensuring the NSW road network remains efficient. There is also a need to ensure that NSW remains an attractive investment location.

Members of AustralianSuper rely on the creation of long-term value for their retirement outcomes, and creating long-term value in assets such as WestConnex play an important role in delivering these outcomes. These infrastructure assets also provide wider economic and community benefits. AustralianSuper has almost 1 million members in NSW, and many of Sydney's road users are Fund members. We agree that road users should be able to make evidence-based decisions that support their cost-of-living considerations.

### **Investment considerations**

To support investment in infrastructure, AustralianSuper, like many other superannuation funds and long-term investors require the certainty delivered by long-term policy settings that provide the conditions for ongoing commitment of capital, while ensuring assets meet their social and economic purpose. Our need for a stable policy environment that supports investment is underpinned by the imperative to deliver member investment outcomes over the long-term.

By nature, significant change to existing toll road network arrangements may result in varied outcomes for users, investors and other stakeholders. The recommendations in the Interim Report are complex and have the potential to alter the fundamental risk and overall investment profile of investments. It is important that processes to create a more efficient road network do not inadvertently impact on future private capital allocation because of the potential investment uncertainty they create.

Lack of certainty around the consultation process or the impact of the tolling changes on existing concessions will increase sovereign risk. Further modelling, policy development and detail is needed for investors to fully assess the likely impact of the recommendations. There is a need to ensure modelling is robust and developed enough to understand the impact of changes on network efficiency, and the distribution of costs among users, toll road operators and Government. There is also a need to ensure that the function, processes and operation for IPART and TollCo are clear.

AustralianSuper is committed to working with the Review and the NSW Government on reform options to achieve the desired outcomes. Thank you for considering our submission. If you have any questions, please contact Nick Coates, Head of Government Relations & Public Policy via email at: [ncoates@australiansuper.com](mailto:ncoates@australiansuper.com).

Yours sincerely

A handwritten signature in black ink that reads "Paula M. Benson". The signature is written in a cursive, flowing style.

**Paula Benson AM**  
Chief Officer, Strategy & Corporate Affairs

# Bexley Chamber of Commerce Inc

Stakeholder Submission

## **Name: Bexley Chamber of Commerce Inc**

### **Do you have any feedback on the Interim Report?**

Comments are mainly directed to a Finding 5 (The lack of a unified pricing system creates complexity, inefficiency, inequities and unfairness) and Finding 9 (The level of tolls appears to be higher than necessary and desirable)

Finding 5 at page 63 notes that ‘The government has recognised the specific problems created at Stoney Creek and Forest Road (alternative route to tolled M8 and M5 East) by introducing a temporary Truck Multiplier Rebate scheme. Under the Truck Multiplier Rebate, motorists can claim a rebate of a third of their toll on class B vehicle trips on the M5 East and M8. A more sustainable longer-term solution would be to ensure that appropriate tolls are set for smaller trucks.’

Firstly, I support recommendation 10 to investigate a new classification for small trucks to incentivise such vehicles to use toll roads. However, the real issue with truck movements through Bexley Town Centre is from large heavy trucks which continue to be a major concern despite the temporary Truck Multiplier scheme. In recognition that our Town Centre’s main roads are used to carry dangerous goods and oversized trucks, for which there is no current alternative route, some relief for Bexley would be to allow all other trucks to use the M8 and M5 toll free. Whilst not in the current terms of reference I believe that the passage of dangerous goods carriers across the state needs to be reviewed in some detail rather than continuing such movements through the Bexley Town Centre bottle neck.

Figure 4.18 in Finding 9 on page 80 attributes a quote to Bexley Chamber of Commerce. The quote looks to be from a Parramatta area Council, not us. The following from our submission to the Toll review would be more appropriate.

‘When the M8 opened on 5 July 2020 the Bexley free alternative to a 9.5 Km section of the M5 came at an additional travel time of only 6 minutes at a saving of \$7.52 for a car or \$22.56 for a truck. This was identified by a representative of Bayside Council in the Legislative Council Inquiry. Clearly the free alternative had been made very attractive due both to local road improvements and the high costs of motorway tolls. Residents, property or business owner on Forest and Stoney Creek Roads and adjacent local streets continue to report disturbed sleep, difficulty driving into and out of premises, loss of trade, impact on property values and rental returns.’

### **Do you have any other recommendations you would like the Review to explore?**

Explore other options to incentivise traffic to use the M5 and M8. Despite the temporary \$60 toll cap and M8 temporary Truck Multiplier scheme there has been no noticeable reduction in toll avoiding traffic along Stoney Creek and Forest Roads Bexley.

**What are your views on adopting network pricing for toll roads in Sydney?**

Good in principle but hard to arrive at pricing that would be fair to all. Take the example of the use of Forest and Stoney Creek Roads as free alternatives for the M5 and M8.

These main roads are relatively narrow at 4 lanes wide which have to also carry dangerous and oversized good carriers as well as local traffic. There needs to be significant incentive by way of free or much cheaper tolls on the M5 and M8 to reinstate one of the key promises of motorways to reduce traffic in surrounding areas, and not increase it through an unaffordable motorway toll structure

**What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.**

Makes sense to me. The more one buys of a commodity at any one time, whether tolls or beer, the cheaper it should be. Motorways save petrol, reduce emissions and wear and tear on vehicles. It's better all round to stay on them for as long as possible and incentivise motorists to do so.

**Having an independent, external dispute resolution function for the toll road industry?**

Perhaps this is a bit late for the current network of Toll Roads.

**What are your thoughts on disclosing the full details regarding the setting of toll price?**

Support

**What additional details would make you more confident that toll prices are set appropriately?**

Make them less of a surprise. Set them at network feasibility stage

**What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?**

In my experience with toll avoiding traffic through Bexley toll relief has not discouraged motorists from 'rat running' through local communities. There needs to be a two pronged approach. Make tolls more affordable and free alternatives less attractive by ceasing to improve their efficiency

# BMW Touring Club NSW

Stakeholder Submission

# **2024 Independent Toll Review - Interim Report**

## **BMW Touring Club of NSW Submission**

15th April 2024

Justin Dorward  
Secretary

## Introduction

The BMW Touring Club of NSW (herein “BMWTCNSW”) welcomes the 2023 Independent Toll Review. Our submission shared the combined perspective of our membership, primarily concerning the lack of due consideration for how motorcycles differ in the context of motorways and tolls.

## Responses

**Recommendation 3:** The NSW Government should adopt the declining distance based pricing as the foundation of network tolling. This would lead to a simpler, more consistent and coherent system of tolls which aligns more closely to the criteria the Review has been asked to consider, namely efficiency, fairness, simplicity and transparency.

**Response:** Whichever toll pricing approach is adopted, further information on how it will apply to motorcycles is needed. For instance, the 0.5 factor of Class A vehicles for motorcycles (as per Recommendation 8) ought to be applied to all elements of the pricing model and calculated on the total price, determining a final price. The BMWTCNSW would not recommend or support the application of Recommendation 8 on a part or single pricing component.

**Recommendation 4:** The NSW Government should consider the role of toll relief in supporting the transition to network tolling. Significant changes in toll relief may need to be phased over time.

And

**Recommendation 5:** If NSW Government chooses to extend or phase out toll relief, it should be with consideration of the following principles:

- Toll relief should be targeted to those that are most in need to the extent practicable through means testing.
- Toll relief should take into account the availability of alternative transport options, in particular alternative non-tolled roads and public transport.
- Toll relief should avoid distorting price signals (e.g. it should not make trips on the tolled network free).
- Toll relief should apply to the entire toll road network.

**Response:** The BMWTCNSW supports approach C (hybrid), where toll relief for motorcycle tolls would promote the reduction of road congestion during predictable peak.

**Example:** A means-tested private customer with at least one class A vehicle and one motorcycle registered to the same account could qualify for minor toll relief when the motorcycle is used on a motorway during defined peak hour and the class A vehicle is



not. A toll relief of this type would promote motorcycle use over car use, when possible. Considering the principles for toll relief, this example best considers road users where public transport is limited or difficult to reach.

**Recommendation 6:** Flexible pricing techniques including peak/off-peak pricing, and dynamic pricing should be available as part of a network tolling system.

**Response:** As per above, the factor of 0.5 (recommendation 8) of class A vehicles ought to be applied to the final toll price, not only a component of the pricing model. Also, the recommended factor of 0.5 ought not to be adjusted depending on the pricing technique of peak/off-peak pricing / dynamic pricing.

**Example:** The BMWTCNSW does not support a dynamic pricing structure that would not apply the factor of 0.5 of class A vehicles to off-peak dynamic pricing. The reasons and justifications for this factor of class A vehicles do not disappear due to the simple application of other pricing options.

**Recommendation 8:** The NSW Government should further explore refining tolling classes in NSW, adopting a uniform definition for Class A vehicles, and a fairer classification for towed recreational vehicles and motorcycles.

**Response:** This recommendation directly solves the core inadequacy of the existing toll system concerning motorcycles. The BMWTCNSW strongly supports this recommendation, including the creation of a motorcycle class priced at a factor 0.5 of class A vehicles.

**Recommendation 11:** Multipliers should be applied consistently across the toll road network.

**Response:** The BMWTCNSW completely supports the creation and implementation of a motorcycle class as priced at a factor of 0.5 to class A vehicles across the network. The same factor should be applied across the network, for consistency.

**Recommendation 13:** The Review recommends consistent two-way tolling as part of the network tolling system. Practical issues with the implementation are still being investigated.

**Response:** The BMWTCNSW supports two-way tolling for the sake of consistency across the network, with an introductory pricing structure on current one-way tolled motorways.

**Example:** The Sydney Harbour Bridge and Sydney Harbour Tunnel are tolled only city-bound (southbound) at this time. As an introductory pricing structure with an expiry date, the new toll for each direction would be half the current one-way toll. In other words, for a period of time, toll road users would not be exposed to a significantly higher toll for the sake of consistency across the network.

**Recommendation 14:** The NSW Government should investigate the scope of the tolled network in Sydney to achieve greater consistency, efficiency, and fairness.

**Response:** The BMWTCNSW strongly recommends the removal of all tolls for motorcycles and this concept be explored in further investigations to achieve greater consistency, efficiency, and fairness. The cost of catering for motorcycles in the toll network likely exceeds the benefit of including them at all. Motorcycles represent only 3.7% of registered vehicles in NSW (Transport for NSW, 30/6/22) and not all motorcycles are used on the toll network. The removal of tolling class A vehicles decreases operational overheads for this class of vehicle to near zero.

**Recommendations 19 to 32:**

**Response:** The BMWTCNSW supports the recommendations concerning increasing oversight, transparency, improving competition measures, enforcements & debt recovery, and complaints.

# Business Council of Australia

Stakeholder Submission

29 April 2024

Professor Allan Fels AO  
NSW Toll Review  
Via Website

Dear Professor,

I am writing in response to the Interim Report of the Independent Toll Review for the NSW Government, released earlier this month.

We support the desire to improve Sydney's toll network. How this is achieved however will be critical.

The Business Council is deeply concerned about the proposal to use legislation to "*override existing concession agreements with private toll road operators in so far as those relate to the toll prices*".

The Interim Report provides limited clarity on what this means for existing concession holders, and the practicalities of how this would be advanced. I am hopeful that the intention was not to suggest that the Government take a unilateral approach to legislate out of its contractual obligations.

Private sector parties have entered into those contracts with the NSW Government in good faith, during periods of leadership by parties of both political persuasions. The Government presumably considered those contracts with detailed legal and commercial advice, not as an uninformed party or subject to any power imbalance. Our concern is that using a legislative process to now override these contracts unilaterally presents a real and tangible case of sovereign risk. Even the perceived threat that this is a live option will undermine confidence in doing business with the NSW Government.

Under such a scenario, this would not only put a question mark around future NSW Government infrastructure public-private partnerships, but it would also create legitimate and serious questions around whether the NSW Government could be trusted to abide by any long-term contractual arrangements that it entered into with the private sector. This would impact not only those parties that would directly contract with the Government, but also providers of finance and funding to those private entities.

Any decision to proceed down a unilateral legislative path risks jeopardising NSW Government policy objectives that rely on private sector support. This risks undermining not only future infrastructure projects, but also major national priorities such as the transition to net zero.

Major projects cannot happen at the scale and frequency they do without private investment. The State of NSW does not have the budget capacity alone to deliver the infrastructure it requires to support its population growth or to facilitate the energy transition required over the next decades. The question raised in the report of "*whether the roads have been appropriate investments in the first*

*place and whether it was, in fact, better that they were introduced earlier than otherwise"*  
demonstrates the alternative; namely, that without this finance those projects would not have proceeded. Contrary to this suggestion, these roads are used by millions of people every day to achieve faster and more efficient journeys, and these citizens would undoubtedly be worse off without this infrastructure. If the NSW Government cannot be trusted to honour agreements, then the State will cease to have access to the private capital it needs to deliver for its citizens.

Concerns about tolling arrangements and any changes proposed should be negotiated in good faith with the Government's counterparties to the contract. I ask that you take this into consideration when formulating and clarifying the detail in your final report to the Government.

Yours sincerely



**Bran Black**  
Chief Executive  
Business Council of Australia

CC: The Hon. Chris Minns MP, Premier of NSW; The Hon John Graham MP, Minister for Roads.

# Committee for Sydney

Stakeholder Submission

May2024

Dear Allan Fels and David Cousins,

### **Re: Toll Review Interim Report**

The Committee for Sydney welcomes the opportunity to provide comment and feedback on the Toll Review Interim Report. We fully support the intention of toll reform for Sydney.

The Committee for Sydney is an urban policy think tank. We are advocates for the whole of Sydney, focused on developing solutions to the most important problems we face. We are proud to have over 160 members that represent key business, academic and civic organisations across Sydney.

### **Overview**

We commend Professor Allan Fels AO and Dr David Cousins AM for their thorough and thought-provoking Toll Review Interim Report. We recognise the work required to propose options for toll reform is not a simple task - indeed, it involves "unscrambling the toll road egg".

However, while we support the intention and some recommendations in the interim report, this submission re-prosecutes recommendations we made in our initial [NSW Toll Review Submission](#). We hope the Toll Review can refocus the public debate away from the cost of tolls to the less desirable alternative of a traffic-choked city.

Our feedback can be summarised into four key points:

1. **Interpretation and approach:** "efficiency" and "fairness" should be interpreted as referring to all Sydneysiders, the entire Sydney transport network, and its effect on place. The approach should be "vision and validate", in line with best practice around the world.
2. **Efficiency:** toll efficiency should not be considered in isolation. A toll reform agenda should consider and address how encouraging toll road use will impact surface roads and communities - by inducing more traffic.
3. **Fairness:** a tolling structure and level that is not designed to manage demand on motorways *and* surface roads cannot be fair. Inducing more traffic and associated pollution is not fair for local communities or future generations.
4. **Toll relief is not efficient or fair:** toll relief removes the best thing about a toll - a price signal - which reduces congestion. Instead, a voucher for people experiencing high cost of living would allow them to spend the money on other uses and modes, while retaining a price signal to keep traffic low.

## Interpretation and approach

We ask the reviewers to clarify their interpretation of the Terms of Reference, particularly how "efficiency" and "fairness" are being understood - and whether these terms are taken to include everyone, or only people who use motorways. In our view, "efficiency" should take into account the entire transport network and its effect on place, and "fairness" should take into account everyone who lives in Sydney.

We read the Toll Review Interim Report as having a predict and provide approach as it seems to focus on how to redistribute toll costs (more fairly), with a goal of inducing more toll road use. Critically, we challenge this approach that will, likely unintentionally, increase traffic and pollution on surface roads and motorways in Sydney.

We suggest a toll reform agenda should be led with a vision and validate approach. The vision should be a city with surface roads that have lots of space for people walking or cycling, with efficient and reliable public transport. Surface roads and streets should be places for people that are pollution-free with low traffic. This aligns with TfNSW's [Road User Space Allocation Policy](#), key objectives of the [Future Transport Strategy](#) and the [Movement and Place Framework](#).

A "vision and validate" approach is now common practice in cities around the world, where various forms of road user charging are implemented with a vision to reduce traffic and pollution. Prof Fels and Dr Cousins note that it is difficult to compare Sydney's tolling system to other cities without recognising this key difference.

Cities around the world that have congestion charging and/or low emission zones - designed to reduce traffic and pollution - include London, Milan, New York City, San Diego, Singapore, Beijing, Jakarta, Warsaw, Riga and Sofia.

The NSW Toll Review is an exciting opportunity to bring Sydney in line with global standards and practices of road user charging. We reaffirm, as per our initial submission, that this cannot be done without engagement with and support from the Federal Government. We suggest the final report makes recommendations to this effect.

## Efficiency

In our view, the Toll Review Interim Report considers toll efficiency in isolation. There is a focus on reforming tolls to increase the use of motorways without consideration of, or the intent to address, how this will impact surface roads, streets and communities.

The Toll Review Interim Report says it is likely Sydney has "toll saturation", where too many toll roads at too high a price discourages toll road use. The irony is, this is precisely what different road user charges are used for in other cities around the world - to encourage choosing active or public transport first, and choose driving last.

If we make it more cost effective to use motorways without discouraging the use of surface roads or encouraging public and active transport uptake, traffic will be induced on both motorways and surface roads. This will result in a net increase in traffic and pollution, which has poor outcomes for place, people walking, cycling or on the bus.



While there may be an argument for reducing the cost of tolls so that more people use motorways instead of surface roads, it is critical that we use pricing and/or other travel demand management techniques to protect and transform surface roads. Indeed, this was the promise of WestConnex.

We agree that network tolling is a good idea, and recommend Prof Fels and David Cousins investigate which parallel surface roads and routes should be included to ensure the tolling system in Sydney works efficiently - encouraging motorway use without inducing traffic jams and discouraging surface road use.

We are also supportive of On-Peak and Off-Peak pricing, or dynamic pricing. This is a key travel demand management technique that is already used for public transport fares. Critically, it will help reduce the risk of inducing traffic jams on motorways.

With respect to the efficiency of the tolling system, we strongly recommend that the Toll Review and NSW Government engage with the Federal Government. Road user charging is a likely future cost for people driving, and therefore any toll reform agenda should take this into account and consider ways in which each system can complement the other.

In line with our vision, the structure and level of tolls should be considered efficient if and when pricing encourages motorway use - without inducing traffic jams - and discourages surface road use. This means setting the right price and travel demand management techniques for both.

As per our initial NSW Toll Review Submission, we suggest introducing a price on some roads and routes that run parallel to motorways. We suggest revenue from these roads could be used to offset or reduce tolls on motorways.

We also recommend implementing various travel demand management techniques for surface roads that can be used to support efforts to encourage toll road use and discourage driving into CBDs and town centres. including:

- Replacing some car traffic lanes with bike paths. wider footpaths. street furniture and trees
- Reducing traffic speeds to less than 30km per hour in major CBDs and town centres
- More frequent and longer pedestrian crossing signals
- Increasing and expanding the parking space levy
- In-lane stopping for buses.

## **Fairness**

A tolling structure and level that is not designed to manage demand on motorways *and* surface roads cannot be fair. Inducing more traffic and associated pollution is not fair for local communities or future generations.

While reducing or rebalancing tolls may be perceived as fairer for motorists. the current recommendations in the Toll Review Interim Report do not take into account the associated impact on people and places. or the liveability of Sydney - as detailed above.

We are acutely aware that some parts of Sydney have poor public transport options and poor active transport infrastructure. This makes it very difficult for some to get around without a car. For those who can't afford a car. living in these areas makes it difficult to access education, employment, services and social activities.

The Toll Review Interim Report refers to mobility-related exclusion but fails to contextualise this within the broader transport network, and instead seeks to address this inequity through the structure and pricing of tolls. As well as this, it suggests motorists should always have a free route available to them.

But the notion of a free route is inaccurate. It is expensive to own and drive a car. The Fuel Excise Tax recovers some money from the cost of driving to pay for road building and maintenance - just as public transport fares recover some money for operation and maintenance - but without a road-user charge these funds will diminish as EVs become more popular.

The growing need for a road-user charge presents an opportunity for the NSW Government to work with the Federal Government to design and develop a road-user charge that integrates with the toll system, and broader transport system to strategically encourage sustainable modes where they are available - or investment in sustainable modes where they are not available.

More important than a 'free route', we argue that the Toll Review should recommend a holistic approach to inclusive, multi-modal transport infrastructure planning. This involves greater investment in public and active transport to ensure everyone has access to frequent and reliable public transport, rather than a system that often preferences motorists over other modal users.

That some people are 'forced' to drive and use certain roads, and potentially get stuck in traffic, is a failure of our transport system as a whole, not our tolling system. We should be able to use pricing to encourage more sustainable mode choices, but this is difficult when they are lacking.

Furthermore, road pricing and traffic congestion exist in equilibrium, and this reality is not adequately acknowledged in the Interim Review. A "free" or "low-cost" road will - always - increase the level of demand for that road, leading to greater congestion. Acknowledging this recasts how we consider 'fairness' of the cost of driving - there is no way around paying to use a road, you either pay in dollars or in time (through increased traffic congestion).

The Toll Review Interim Report's recommendation to introduce declining distance-based charges is sound. Another option, that we recommended in our initial NSW Toll Review Submission, is to introduce a road user charge based on people's access to public transport and/or household income. If this option is considered it needs to be done in consultation with Federal Government.

Like the option of introducing a charge on parallel routes, introducing a per kilometre charge (which could also be declining distance based, as recommended by the Toll Review Interim Report) would raise revenue that could be used to offset or reduce current tolls<sup>1</sup>. This would enable government to encourage the use of motorways without inducing traffic on surface roads. These two options are also not mutually exclusive but could be implemented together for an even greater handle on traffic demand management.

We note the Interim Report discarded the option for zonal charges - as the ones proposed by Government were "arbitrary". Our recommendation to tie per kilometre rates to the level of public transport accessibility at people's home address overcomes this issue. This could be done at an SA1 level to make administration easier.

Critically, a declining distance based per kilometre road user charge based on people's home address does two key things:

---

<sup>1</sup> Any additional revenue could be used to fund public transport improvements

- reduces inequities that may arise from the introduction of a per kilometre road user charge
- sends a price signal to government on where more public transport is needed, as well as encourage more dense land use patterns.

Another of our initial recommendations that relates to fairness, is for the Toll Review to recommend the cost of all transport modes are reviewed to ensure pricing is fair and encourages sustainable trips where they are available. This is pertinent considering the Interim Report's recommendation to charge two-ways on the Harbour Bridge, Sydney Harbour Tunnel and Eastern Distributor - which we support as it will have the effect of encouraging sustainable modes on these routes.

**It costs more to catch the train or bus two ways on some routes than it does to drive**

Cost for two-way trip on toll roads compared to public transport

	Sydney Harbour Bridge Toll	Sydney Harbour Tunnel Toll	Eastern Distributor Toll (Class A)	Train (0-10km)	Train (20-35km)	Bus (0-3km)	Bus (8km+)
Peak	\$4.27	\$4.27	\$9.51	\$8	\$11.44	\$6.40	\$10.66
Off Peak	\$2.67-\$3.20	\$2.67-\$3.20	\$9.51	\$5.60	\$8	\$4.48	\$7.46

We also note that travel costs (Opal fares) increase with distance for public transport users, however travel costs do not decrease with distance like the Interim Report suggests should occur for tolls. With fairness in mind - particularly with regard to the concern of 'pricing access'-, this is why we recommend a Toll Review cannot be done in isolation, and as such a review of the cost of all transport modes should be done undertaken to ensure sustainable modes are encouraged where they are possible.

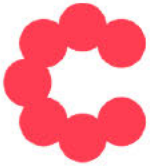
Finally, with regards to fairness we do not believe there should be any concerns with contract floors that mean toll prices do not decrease when CPI does. Costs similar to tolls associated with comparable transport options do not reduce when CPI does. Public transport fares do not fall with CPI so we do not believe this is an issue that the Interim Report should be contemplating.

In line with our vision, the structure and level of tolls should be considered fair if and when net traffic and pollution is reduced in Sydney, with more space for people on streets and roads and better access to sustainable transport.

**Toll relief is not efficient or fair**

As the Toll Review Interim Report points out. toll relief is not fair or efficient. Tax-payers are dishing out more than \$0.5 billion per year toward toll relief, which could be put towards more equitable and targeted cost-of-living relief.

We are disappointed that while the Interim Report points to the inefficiency and inequity of toll relief, they do not make any strong recommendations to remove it or replace it with an alternative. In our initial submission we made the recommendation to replace toll relief with a cost-of-living voucher.



Depending on costs, the vouchers could be for everyone, or just for people who live in areas with low or no access to public transport. There could be various options for how people can spend the value of their transport voucher. Options could include paying a toll bill, topping up an opal card, or paying a deposit on an e-bike. Even a voucher that provides cash for any use may deliver better public policy outcomes than the existing toll relief.

Providing toll relief removes the best thing about a toll – a price signal – which ensures reduced congestion. Instead, a voucher that provides the same or similar amount of money to people experiencing high cost of living would allow them to spend the money on other uses and modes, while retaining the price signal to keep traffic low.

### Closing remarks

Thank you again for the opportunity to provide feedback and comments on the Toll Review Interim Report. We are greatly enthused by the intention to put forward a strategic toll reform agenda. Our feedback is intended to help achieve this goal.

If you have any questions or would like to discuss further, we are more than happy to do so.

Kind regards,

Eamon Waterford  
CEO  
The Committee for Sydney

Harri Bancroft  
Policy Manager, Mobility  
The Committee for Sydney

# Global Listed Infrastructure Organisation (GLIO)

Stakeholder Submission

April 23, 2023

NSW Toll Review

Email: [tolling\\_pmo@transport.nsw.gov.au](mailto:tolling_pmo@transport.nsw.gov.au)

Dear Professor Allan Fels AO and Dr David Cousins AM

## **Re: NSW Toll Review**

We value the opportunity to respond to the NSW Toll Review released on March 11, 2024.

### **Background – Growth of listed infrastructure assets/funds under management**

The Global Listed Infrastructure Organisation (GLIO) was established in 2016 to represent the collective interests of listed companies operating in the following sectors:

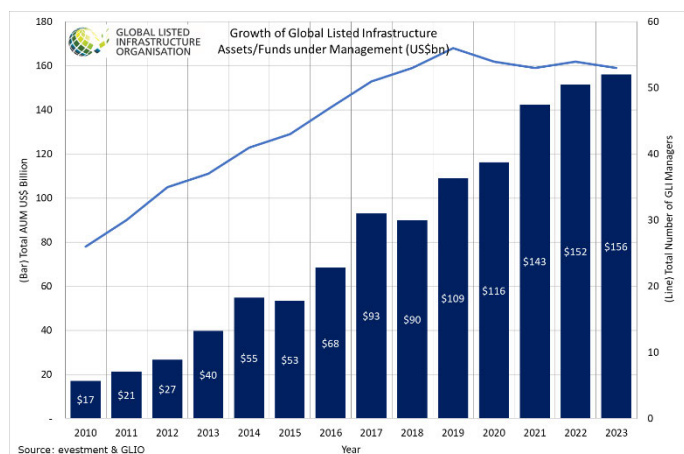
- regulated electric, gas, water utilities, and renewable energy
- transportation infrastructure – toll roads, railroads, airports, and marine ports
- energy transportation & storage
- communications infrastructure – telecom towers, cables, and satellites

At a global level, this covers approximately, 200 companies, representing over US\$3 trillion in market capitalization, or well over US\$4.5 trillion in enterprise value. Companies like ASX listed Transurban are an important part of this universe.

Equally, GLIO represents the interests of the specialist-listed infrastructure investment managers who invest in this universe of companies.

GLIO tracks the total assets, or funds under management (AUM) of the 50+ specialist listed infrastructure managers globally. Since 2010, listed infrastructure AUM has grown from US\$17bn to just under US\$155bn at the end of 2023. The chart displays this year-on-year growth.<sup>1</sup>

We believe AUM growth has taken place because institutional investors' target allocations to infrastructure have increased considerably over this period, and listed infrastructure companies are an attractive stable home for this capital. We believe this trend will continue providing that national regulations remain attractive for domestic and international investors.



<sup>1</sup> This AUM figure does not include pension fund/SWF listed infrastructure allocation managed in-house.

### **Toll reform offers other opportunities**

The NSW toll review represents a genuine opportunity to improve the customer experience for drivers on Sydney's roads and deliver long-term benefits for the NSW community more broadly. While this is an important and meaningful ambition, any changes that are made must be done without altering existing contracts, which would not only be detrimental to NSW's standing as a safe place to invest but would also diminish Australia's overall standing among institutional investors mentioned above.

### **Australia has been an attractive place to invest**

Australia has long been an attractive place to invest for many reasons. It has stable governments, a dynamic and vibrant economy, and a growing population. These factors have helped to attract enormous investment in infrastructure from both foreign and domestic institutions. Companies like Transurban and its partners have benefitted from this capital and together they have invested more than A\$37Bn over two decades in assets in Queensland, New South Wales, and Victoria.

At a national level, in the 2022-2023 financial year alone, almost A\$70Bn of private capital was invested in infrastructure projects across transport, energy, telecommunications, and water sectors. This investment has provided the critical services that would otherwise draw on government resources, or simply not be provided.

### **This has provided significant benefit**

Investment from the private sector has helped deliver vital transport solutions to communities in Australia and globally. However, budget-constrained governments continue to grapple with the challenge of how to maintain and develop critical infrastructure, plus how they can attract additional domestic and international capital to meet their infrastructure investment funding gap. Effectively, governments are competing with each other to attract capital to close the funding gap.

Traditional, or core infrastructure sectors that attract private investment, including transport facilities, communications infrastructure, electricity generation, transmission and distribution facilities, and gas and water utilities, deliver significant benefits to governments by funding critical infrastructure that connects communities and drives economic growth. These sectors form the basis of the FT Wilshire GLIO global infrastructure index (see table below) and are tracked by investors worldwide.



Global Infrastructure Sectors	Mkt Cap Size \$USD Bn	Index Weight
Utilities	1,251	49.4%
Transportation	549	21.7%
Energy Transportation	348	13.7%
Renewables	199	7.9%
Communications	186	7.3%
<b>Total</b>	<b>2,533</b>	<b>100.0%</b>

As of March 31, 2024

### **This is under threat**

Australia has historically been a leader in enabling and attracting private infrastructure investment but is facing increased competition globally, including from North America, where the attractiveness of the investment opportunity has nearly doubled in the space of two years.<sup>2</sup>

GLIO believes that adverse changes to the recognized regulations and structures in which these companies operate could result in multiple billions of capital being rerouted to more attractive countries, asset classes, or sectors. This is a serious risk.

The suggestion alone that governments should consider legislating themselves out of contracted obligations would be deeply troubling and would seriously damage the trust institutional investors have in Australia as a stable and predictable place to do business, with far-reaching consequences. Injecting a level of regulatory uncertainty and volatility will damage capital allocations in the country.

### **We have seen examples of this in other industries**

The energy and manufacturing industries have been earmarked by the federal government as key opportunities for the government and private sector to work together to bridge the gap that exists in funding for critical objectives, such as the transition to renewable energy. However, the past 12 months have seen increasingly frequent direct interventions in the energy market, resulting in significantly reduced investor appetite to invest.<sup>3</sup>

---

<sup>2</sup> [Australian Infrastructure Investment Report 2023](#)

<sup>3</sup> [Australian Infrastructure Investment Report 2023](#)



### **In conclusion**

Global infrastructure investors require regulatory stability to deploy long-term capital. Governments worldwide are competing to attract this long-term capital and bridge their infrastructure fund gaps. Australia has proven to be an attractive destination for international infrastructure capital over recent decades, and this has played an important role in the A\$37 Bn that Transurban and its partners have invested in the Australian road system. Changing the regulatory playing field, and creating unnecessary uncertainty could stop further investment in its tracks. I struggle to see who benefits from this.

We would welcome the opportunity to answer any questions you may have, and we are happy to discuss this matter further if you wish.

Yours faithfully

Fraser Hughes  
Chief Executive Officer  
Global Listed Infrastructure Organisation  
+32 471 100 400  
  
+32 2767 1888  
f.hughes@glio.org

**About GLIO:**

The Global Listed Infrastructure Organisation (GLIO) is the representative body for the \$3 trillion market capitalization listed infrastructure asset class. Specialist-listed infrastructure managers make up a significant part of the membership, along with banks and advisors. The specialist managers have approximately \$155bn in assets under management.

GLIO is a central portal for investor education, listed infrastructure research, and national and international regulatory issues.

For more information visit: [www.glio.org](http://www.glio.org)

# Infrastructure Partnerships Australia (IPA)

Stakeholder Submission



13 May 2024

Prof. Allan Fels AO and Dr David Cousins AM  
Review Chair and Deputy Chair  
Independent Toll Review  
NSW Government  
Via email: [tolling\\_pmo@transport.nsw.gov.au](mailto:tolling_pmo@transport.nsw.gov.au)

## SUBMISSION IN RESPONSE TO THE NSW GOVERNMENT'S INDEPENDENT TOLL REVIEW INTERIM REPORT

Infrastructure Partnerships Australia welcomes the opportunity to provide this submission in response to the Interim Report of the Independent Toll Review in New South Wales.

Infrastructure Partnerships Australia is an independent think tank and executive member network, providing research focused on excellence in social and economic infrastructure. We exist to shape public debate and drive reform for the national interest. As the national voice for infrastructure in Australia, our membership reflects a diverse range of public and private sector entities, including infrastructure owners, operators, financiers, advisers, technology providers and policy makers.

This submission responds to the Interim Report, and follows our July 2023 submission in response to this Review's Discussion Paper. Infrastructure Partnerships Australia has been a loud and consistent voice for road reform, including calls for the introduction of road user charging across the entire network, as well as rationalisation of toll road pricing. Our perspective in this submission draws from many years of advocacy on this topic, dating back to our 2009 paper *Urban Transport Challenge: Driving Reform on Sydney's Roads*. The full list of our submission and reports on this topic were referenced in our previous submission, and can be found on our website at <https://infrastructure.org.au/>.

**We agree with much in the Interim Report, but critical flaws must be addressed**

Infrastructure Partnerships Australia welcomes the broad reform direction of the Interim Report, including its call for NSW to move to a unified network tolling model that is simpler, fairer and more efficient for motorists. We have been advocating for reforms of this nature for many years, so it is encouraging to see the Review Panel adopt this model as the desired outcome of reforms.

However, Infrastructure Partnerships Australia holds grave concerns about the reform pathway laid out in the Interim Report. In particular, we are dismayed at the apparent disregard for the importance of toll road contracts signed and held by the NSW Government, with the Interim Report seemingly recommending the Government merely override these contracts and hope for the best. This is not a reform pathway. It is a recipe for disaster, and NSW taxpayers will be left to clean up the mess if the Panel does not reconsider and reframe its advice on how to progress these important reforms in its Final Report.

This submission lays out Infrastructure Partnerships Australia's concerns with some elements of the Interim Report, and provides advice on how to progress reforms based on sensible collaboration and negotiation in

good faith. It is possible to achieve the Panel’s strategic objectives in a way that respects the NSW Government’s contractual obligations, builds social licence among the millions of motorists who use Sydney’s toll roads, and delivers substantial value for motorists and taxpayers over the coming decades. This submission aims to inform a more sensible and less reckless pathway.

Infrastructure Partnerships Australia is concerned with a number of elements of the Interim Report

#### *Disregard for the importance of contracts*

The Interim Report highlights that toll road concessionaires hold ‘significant contractual rights’ that may complicate tolling arrangements and breaking these contracts may come at a cost to taxpayers. These contracts were signed in good faith by successive NSW governments with concession holders over many years. The Government cannot now simply override these contracts or pretend they do not exist. Further, even the act of threatening to override contracts is damaging and should be immediately withdrawn.

While these contracts may be an inconvenient truth for the Review Panel, they are real and the risks of overriding them are dire. Australia has a hard-won reputation of being a place where contracts matter.<sup>1</sup> The suggestion that legislation can be unilaterally imposed over the top is reckless and should be treated as such. Instead of seeking to override these contracts, this Review needs to present a meaningful pathway for working with concession holders to deliver an outcome that works for all parties. Advice on how to address this critical flaw in the Interim Report is provided later in this submission.

#### *Assumption there is no scope for collaboration on reform*

To assert that the relationship between government and concession holders is adversarial and that negotiation around the reform pathway is virtually pointless, as the Interim Report does, is neither reasonable nor productive. Toll road investors, for instance, have worked closely with the NSW Government over decades to expand Sydney’s road network and enhance outcomes for motorists. All parties would benefit from a simpler, more transparent and more efficient approach to tolling in Sydney.

The justification for seeking to legislate over – rather than negotiate – existing concession contracts because negotiation is ‘highly unlikely’ to be successful appears to be little more than personal conjecture. It is not based on evidence, flies in the face of reality, and ignores ample evidence from multiple post-contract negotiations that have occurred. Equity holders have consistently stated publicly over recent years, including at public inquiries and in submissions to this Review, that they are open to reform, will consider a range of reform options, and would welcome the opportunity to work with the NSW Government on what a reform pathway looks like.

For the Interim Report to propose a reform pathway that does not even attempt collaboration or good-faith negotiation is, at best, curious. The proposed pathway risks adding to the costs and complexity of reform – a scenario that does not benefit taxpayers or motorists in any way, let alone the many taxpayers and motorists who also hold an interest in toll roads broadly through their superannuation investments.

#### *An absence of evidence underpinning many assertions*

Beyond the false assumptions around the usefulness of negotiation, many of the findings in the Interim Report appear to place ideology before evidence.

---

<sup>1</sup> Infrastructure Partnerships Australia, 2023, *Australian Infrastructure Investment Monitor 2023*.

That toll roads exhibit natural monopoly characteristics should come as no surprise. This merely reflects the nature of the asset class, as is true for many other forms of infrastructure. It is not feasible or efficient for there to be competition within the market, so the focus must be on competition for the market – that is, through competitive bids for each concession, as has occurred for each toll road. The authors may not like the overall outcomes of these individual transactions – and we agree there is a strong case for reform and improvement of some outcomes, as Infrastructure Partnerships Australia has publicly advocated for many years. However, it is unfair to criticise toll road operators such for doing precisely what was asked of them by NSW Government through the contracts they signed together.

Toll road operators have invested many tens of billions of dollars in the assets they operate, delivering services to Sydney’s motorists that typically far exceed standards of service on the broader road network. It is important to make crystal clear that without tolling, many of the nation’s most significant and valuable road corridors simply could not have been built, or their delivery would have been delayed by decades. To put it plainly, the road exists because the toll exists.

Lines such *‘the public appears to view Transurban as a monopolist taking advantage of its position to make excessive profits’* should have no place in a review of this kind, especially when such an emotive characterisation appears to be based on no evidence whatsoever of public sentiment. To criticise concession holders for wanting to ‘play a major role’ in negotiations about the contracts it holds and to suggest that this would *‘further entrench...the perception of its influence over Government’* simply beggars belief. The Panel may wish to alter some aspects of the concessions, but this should be no cause for inflammatory characterisation of a key group of stakeholders for the NSW Government. This is particularly true given that the concession holders are delivering on, and in some cases beyond, their contractual obligations.

The Interim Report also makes a number of notable omissions, which are worthy of inclusion for both context and completeness. For instance, the Report gives very limited airtime to the efficiently transferred risks enabled by the facility-based tolling model. As canvassed later in this submission, the transfer of patronage risk on assets such as the Cross City Tunnel and Lane Cove Tunnel saw taxpayers protected from substantial losses. The pandemic provides a contemporary and irrefutable example of the benefits of risk transfer, with concessionaires having revealed a cumulative portfolio wide revenue loss during lockdowns of *“hundreds of millions of dollars”* being entirely – and appropriately – borne by private investors at zero-cost to taxpayers.<sup>2</sup>

#### *Misunderstandings about the history of competition and (asset) price discovery*

The Interim Report’s reflections on how the toll road market was developed diverge from reality and logic. While the Report acknowledges that each concession was awarded as the result of competitive bidding processes, it bemoans a lack of competitive tension in the tolled roads. This is simply false and misses two salient points – firstly that toll prices are in all instances a decision made by government, and secondly that individual assets have typically been subject to fierce competition ‘for the market’.

It is also an extremely pertinent proof point that two major NSW concessions were acquired by their current owners out of receivership. This illustrates not only the existence of a market for toll roads, but also that the terms of toll road concessions are not as structurally generous to private owners as the Interim Report seems to suggest.

---

<sup>2</sup> See Transurban, 2021, *Transurban FY21 Results* and Transurban, 2022, *1H22 Results*.

As stated in our previous submission, at the macro level, the setting of tolls is not complex. A given road will have a particular delivery cost – the government makes a choice about whether that road will be paid for by users (through tolls) or by taxpayers (from consolidated revenue), or some combination of the two. This also extends to the ongoing costs of maintaining that road over time. With a particular traffic expectation baseline, there are four levers available to any government in making that decision, being:

1. the starting toll
2. the escalation rate of the toll
3. the concession length, and
4. any upfront capital contribution on behalf of the taxpayer.

Crucial to this framework is an appreciation that a government's decision to move any one of these four levers, within a given revenue envelope, necessarily requires one or more of the others to also move in order to ensure the funding remains available to deliver the road.

The Interim Report's reading of history appears to misunderstand this point, that it is the role of governments or regulators to determine prices within a natural monopoly market like toll roads. Every toll road contract was signed in good faith by governments on behalf of taxpayers after intense scrutiny. It begs the question: if these contracts represented a bad deal for taxpayers or if they were borne of insufficient competitive pressure, as the Interim Report suggests, why did the Australian Competition and Consumer Commission approve all transactions it opined on and did not enact its reserve powers upon others?

#### *The risk of competition being undermined is overstated*

The Interim Report identifies that competition law prevents competitors from reaching agreements on matters which are likely to fix or maintain prices. Infrastructure Partnerships Australia notes that there is no suggestion that in the development of a network tolling approach competing business should be given the right to agree on fixing, controlling, or maintaining the prices that they will charge for goods or services. There are clear distinctions that allow competing businesses to have levels of input to the development of prices in a market where prices are not responsive to pressures of supply and demand. To deny concession holders the same rights as extended to businesses in other sectors would be an extraordinary betrayal of procedural fairness, chillingly anti-competitive, and would set a dangerous precedent for businesses across the NSW economy.

#### *Interim Report appears to have a simplistic understanding of infrastructure financing*

The complexity of equity ownership structures at the asset/concession level is well canvassed in a number of submissions (including our own) to the Review. The Final Report should further reflect on these complexities and on the consequences, intended on or otherwise, of the extant proposed reform pathway. However, the reviewers should also consider, and opine on, the debt financing structures that underpin a model that has supported Australia's position as the leading jurisdiction globally for infrastructure finance and delivery.

Toll road assets, subject to their specific characteristics, will be financed through a balance of equity and debt instruments. These debt facilities, typically provided by a broad syndicate of domestic and international institutions, are long-term and prescriptive in nature. They are supported by a range of detailed conditions and covenants. The Reviewers would be acutely aware of how lenders would view the prospect, or reality, of legislation that seeks to override a contract to which their lending is a party. The reviewers should note therefore, that the suite of 'financial' class stakeholders impacted by the proposed reform pathway is far broader than the equity owner group – and the Final Report must explicitly canvass the likely impacts on, and response by, this group.

### *Simplicity of the pathway and proposed network tolling model*

The Interim Report highlights the need for a *'coordinated network pricing system based on simpler principles than at present'* and for methodology of toll-setting to be 'coherent and economically rational'. We agree on the destination, but question whether the pathway proposed in Interim Report will take us there. Rather, the approach put forward in the Interim Report risks making Sydney's tolling system even more complex. This would undermine confidence in change, muddying the waters for many motorists who may believe they are worse off even when the reforms may benefit them.

The network tolling system proposed by the Interim Report is unnecessarily complex. Declining distance-based tolls, which are proposed to form the basis of a proposed new network structure, do not provide clear charges to motorists.

Beyond issues of pricing opacity under the proposed model, a declining distance-based model also introduces new and more complex equity concerns. For instance, it is unclear why two otherwise identical vehicles driving side by side on the same road should be charged different rates for the same kilometre. It is equally unclear why an individual's last kilometre on a toll road is any less valuable than their first. Lack of a reasonable, logical explanation to these, and other inequities, serves to immediately undermine the declining distance-based model.

A declining distance based charge requires motorists to actively calculate and engage with the specific distances they wish to travel on specific roads to know what their costs will be before they travel. The likelihood of most motorists undertaking these preliminary activities before they travel is low. It is far more likely that, under a declining distance-based toll approach, most motorists will only know the costs they will incur long after they have incurred them. Tolls must be simple to be viable.

Pricing cannot influence behaviour, as the Interim Report acknowledges is highly desirable, unless motorists can understand what and how they pay for roads. The Interim Report calls for an 'economically rational' price, for economic rationality to hold true, consumers need price transparency to inform their decision making. We would respectfully submit that if calculating one's potential toll requires a PhD in econometrics, the effect of rational pricing will be somewhat subdued.

As a matter of principle, Infrastructure Partnerships Australia further submits that broader cost-of-living issues and socio-economic fairness are more appropriately considered through wider tax and transfer systems, not narrowly within the tolled road network, and should be approached at a whole-of-government level.

*Unless these issues are addressed, the consequences could be dire*

The NSW Government must, as a matter of priority, publicly commit to respect its contractual obligations. The knock-on impacts of the NSW Government overriding its own contracts through legislation could be disastrous and far-reaching. This would escalate sovereign risk for any other entity that holds a contract with the NSW Government, and put a chill through any prospective concession holders and investors for many years. This risk premium can only put upward pressure on the Government's cost of capital, and may spook some prospective partners from investing in NSW altogether.

The potential implications extend far beyond infrastructure markets, across all services in which the Government partners with the private sector, and at a time when the need for trust in government contracts has never been



greater. In particular, the NSW Government's push to decarbonise the state cannot be achieved without a trusting, long-lasting partnership with the private sector, including asset operators and investors. In the energy sector alone, tens of billions of private capital are needed to coinvest in the transformation of the state's infrastructure. Mishandling the process of tolling reform, potentially including ripping up contracts with concession holders, would give pause to every other prospective private sector partner before signing a contract with the NSW Government for decades to come. A sure-fire way to make investors hesitate over the dotted line is to theatrically rip up one contract as we ask them to sign another.

The Final Report should offer sensible, collaborative approach to advancing important tolling reforms

The Interim Report's suggestion of overriding contracts through legislation needs to be abandoned. In its place, the Final Report should lay out a pathway that prioritises meaningful engagement with key stakeholders to negotiate the reforms to Sydney's tolled network that will benefit motorists and taxpayers for decades to come. If – as the Interim Report indicates – the NSW Government wishes to consider exiting or amending its toll road contracts, it must do so with the same spirit of good faith as it developed and agreed to these contracts in the first place.

The outcome of a more equitable, transparent and efficient Sydney tolling network that is understood and supported by all stakeholders is achievable. The potential benefits to Sydneysiders and the broader economy of reform are substantial. As Infrastructure Partnerships Australia has argued previously, toll road reform presents a rare opportunity for consensus-driven, positive change that benefits all parties. However, the only pathway to successful, meaningful reform is through sensible discussion, collaboration and negotiation in good faith.

This reform is too important for it to be treated as a political or ideological football. We call for the Final Report of this Review to adopt a more objective perspective that puts facts before conjecture in its development of revised findings, and takes an evidence-led approach to developing its revised recommendations.

We would welcome the opportunity to engage further with the Review Panel as it develops of the Final Report of this Review. Please do not hesitate to contact Mollie Matich, Head of Policy and Research, on (02) 9152 6000 or [mollie.matich@infrastructure.org.au](mailto:mollie.matich@infrastructure.org.au).

Yours Sincerely,



ADRIAN DWYER  
Chief Executive Officer

# Intelligent Transport Systems (ITS) Australia

Stakeholder Submission

# Independent Tolling Review

## ITS Australia Submission

April 2024



ITS Australia is the peak body for the transport technology sector and many of our 150+ member organisations play a role at the leading edge of new and emerging technologies to improve safety and efficiency on our transport networks.

The early days of ITS Australia was focused on harmonising tolling technologies across Australia bringing together government and industry to develop and deliver the first national cross-border harmonised tolling system. Applying technology to solve some of transport's biggest challenges is one of the core tenets for ITS Australia and our members. It was recognised that the tolling of roads enabled individual State Governments to deliver these major facilities earlier than waiting until budgets were available, but it was important that the community experienced a seamless payment system, regardless of the State.

ITS Australia welcomes the opportunity for engagement with industry and the wider community and highlights potential additional transport technology benefits for Australians. From a technology perspective, there is potential that emerging innovations in vehicles and infrastructure can enable more adaptive and nuanced pricing mechanisms on our transport systems. These technologies can also offer serious safety and productivity benefits for all road users and network operators.

Australian governments have the shared targets of halving road deaths by 2030 and achieving zero road deaths by 2050, as well as reaching a target of net-zero emissions by 2050, and connected, electric and automated vehicles technology has real potential to assist in these endeavours.

These cutting-edge digital communication technologies will allow cars to interpret their surroundings and alert drivers to potential hazards intelligently. In 2020, ITS Australia with research partners University of Melbourne and key government agencies published a report 'Investigating pathways to deliver road safety and network efficiency benefits through connected technologies' which revealed that these technologies can reduce vehicle crashes by up to 78 per cent, dramatically reducing road trauma and the death toll. These same connected vehicle technologies have the potential to play a significant role in future tolling and pricing solution ecosystems.

ITS Australia commends the NSW Government undertaking this review into the tolling pricing system targeting the Sydney metropolitan area where there are 13 toll roads, including two operated by the State Government with the remaining 12 operated by private concessionaires. ITS Australia recognises that there are a range of pricing models across these toll roads that are set using a variety of metrics, including time of day, kilometres travelled, trip purpose, travel direction and more. While these lack transparency to most users, there is an important fundamental economic principle underpinning the tolling of roads.

The phrase "the high cost of free parking" refers to the economic principle known as "opportunity cost." This principle highlights that even though parking might be offered for free in certain areas, there are significant hidden costs associated with it. These costs include the value of the land used for parking, the environmental impact of accommodating cars, and the missed opportunities for using that space for other purposes that might have higher economic or social benefits.

In urban areas, free parking often leads to increased traffic congestion, inefficient land use, and higher pollution levels. This concept underscores the idea that seemingly free resources like parking spaces (or roads) actually have substantial costs, which can be better managed through policies like pricing parking appropriately or investing in alternative transportation options.

Appropriately pricing road use can lead to a more financially sustainable and efficient transportation system, benefiting both road users and the broader community. These benefits align with principles of economic efficiency, sustainability, and equity in infrastructure financing. There is also Innovation and Technology: Tolling systems often leverage advanced technology for payment collection and traffic management. Investing in these systems can spur innovation in transportation technology and contribute to the development of smarter, more sustainable urban mobility solutions.

With more than 1,200 people dying and over 30,000 people being seriously injured each year on Australia's roads, the only long-term goal we can have is for zero fatal and serious injuries. Emerging and future technologies will provide enhanced in-vehicle and network safety and efficiency; these technologies can also support equitable and transparent pricing mechanisms; however the deployment of these technologies needs government consideration and oversight.

In this context it is important to consider the issue of road pricing overall in this Inquiry into tolling. The wider impacts on the transport ecosystem are key for the community as there will be significant changes to the sector over the next decade with the increased take up of electric vehicles and more efficient ICE Vehicles. Industry is keen to work with government to best deliver these life-saving and efficiency enhancing technologies, and ITS Australia is well placed to facilitate these discussions and activities.

To facilitate any future engagement, ITS Australia Policy Manager Stacey Ryan can be contacted at [Stacey.ryan@its-australia.com.au](mailto:Stacey.ryan@its-australia.com.au).

Yours sincerely,



**Susan Harris**  
**Chief Executive Officer**

# Itsaustralia<)

Intelligent Transport Systems

# Its australia<)

Intelligent Transport Systems

## PLATINUM

aws CUBIC kapsch >  
challenging limits

NEC

Queensland Government

NSW GOVERNMENT

:Transurban

VICTORIA State Government Department of Transport and Planning

## GOLD

g almsun

Deloitte.

ainroads  
...WIIIS\*HRRN AUSTXALLA.

9Piiii

tJ

SIC:::

bml

ftITRANSMAX

9"JUGL

## SILVER

aldrldge

AARCADIS

ARUP

A

aurecon

Autso,ds

1-tI

BOSCH

RAEMAC

BRAUMS

CE S

CBS

ISC O,ss// ; ...

MMUN TIANJ IT

COMP'ASS

D

DIREC,IS,9,-

M

EaslMk

micro

Lf.IE.'t

@

EFELICITY

GEWI

B

(BJHYUnDRI

MOVE

indra

Inn0:--Usion

JfJ

OIntegrate

OInte

JHLEO-

JUVANA

Keolis Downer

Lantech

Liftong

liveBetter

LOGIX

LUMINATOR

MASTERCOM

METRO

MICRO connect

MONASHUniversity

fmoovit

M

'NHvg

an.(,)

<< ..J

mmD

optibus

osMODAL

RM

RACQ

RACV

CUANP'CT

£:..!

OS4GE

scriptus

seeing machines

SEISMA

SK K

SKEDGO

SMC

SNAPPER

Sprightl'

Government of South Australia

Stantac

c;Y!;IUA

tomtom

TOYOTA

TS C

TRAFFIC TECH

C\*t

anslu,,rt..

transoptim

ofaJ

IM&

t

9UTS

Y&ISAU

venba

Qv10

8vmtDNIC

IIEST!IRIWI

YUN"X TRAFFIC

@

# Jim Australian Pilot Vehicle Drivers Association

Stakeholder Submission



## **Name: Jim Australian Pilot Drivers Association**

### **Do you have any other recommendations you would like the Review to explore?**

Oversize Pilots accompanying an Oversize load as a requirement of a Class 1 single trip Permit or running under a Multi State exemption are being charged Heavy vehicle rates on Tollways because the legal signage being deployed sets off the height restriction camera at toll booths. This only happens in NSW, not in Victoria or Qld.

All Pilot vehicles have to be under 4.5t GVM to be able to operate.

I will attach an attachment outlining all the avenues we have exhausted to get vehicles onto a register to gain a review and be credited back to our account.

### **What are your views on adopting network pricing for toll roads in Sydney?**

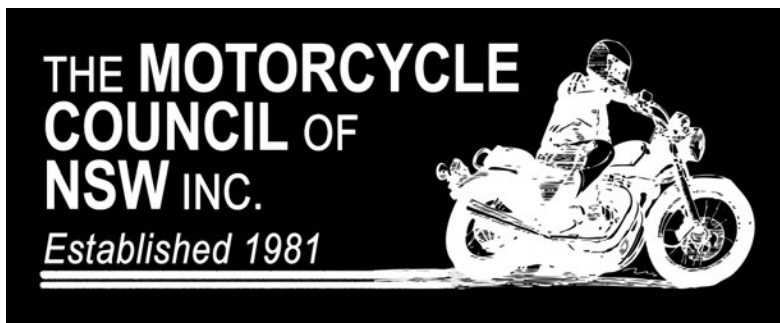
Networking would be an asset as long as it is done properly.

# The Motorcycle Council of NSW (MCC)

Stakeholder Submission

# Tolling Review Interim Report Submission

30<sup>th</sup> April 2024



Submission to:-  
Independent Tolling Review  
Professor Allan Fels AO and Dr David Cousins AM

The Motorcycle Council of NSW  
PO Box 517 Parramatta NSW 2124  
[enquiries@mccofnsw.org.au](mailto:enquiries@mccofnsw.org.au)  
[www.mccofnsw.org.au](http://www.mccofnsw.org.au)

## **About The Motorcycle Council of NSW**

The Motorcycle Council of NSW Inc. (MCC) is an internationally recognised umbrella group for motorcycle clubs, associations and ride groups, in the state of New South Wales advocating for more than 70 motorcycle clubs and encompassing a collective membership exceeding 42,000 motorcyclists.

Established in 1981, the MCC is recognised as the peak motorcycle representative body in NSW and Subject Matter Experts on many complex issues dealing with motorcycling including crash data and statistics, traffic data and congestion information.

The MCC has published documentation that has been referenced worldwide by overseas motorcycling and traffic bodies and has produced video training films that have been utilised and referred to by many overseas trainers, researchers and ride associations.

We wish to thank the Independent Reviewers for the opportunity to present this submission and the views of our member clubs on the Interim Report.

Should you require further information on the information contained within this submission please contact the MCC.

Brian Wood

Secretary

## Comments on the Interim Report

For years, The Motorcycle Council of NSW has endeavoured to collaborate with authorities to establish a distinct tolling class for motorcycles. There is no plausible reason why motorcycle tolls should mirror those of cars, and the Council seeks to address this disparity through engagement with relevant authorities.

It is encouraging that the Independent Reviewers are supporting this view and are proposing that a separate tolling class be introduced for motorcycles and that motorcycle tolls be half that of a car.

It is noted that on page 121 of the Interim Report it says:-

### *“Implementation considerations for the new motorcycle classification*

*Although experience in Victoria and Queensland suggests the feasibility of the Review’s draft recommendation on motorcycles, further consideration of safety, traffic management impacts, and technological implications of this proposal will be undertaken prior to the Final Report.*

*Additionally, introducing a new class for motorcycles is anticipated to decrease toll revenue. This shortfall, if not compensated by other means, necessitates increased tolls for other users. Given that motorcycles constitute a minor proportion of vehicles on toll roads, the overall impact of this change is expected to be minimal.”*

Given that motorcycles already utilize toll roads and the proposed adjustment merely entails a toll reduction, it becomes challenging to ascertain the necessity for additional examination regarding safety, traffic management repercussions, and technological considerations associated with this proposal.

Current tolling equipment is able to read a motorcycle’s rear numberplate and then process this information to charge a toll. As motorcyclists are not required to carry an E-Tag, systems are already able to distinguish a motorcycle from other vehicles so as not to apply a charge for numberplate matching. The only change the proposal will require will be the ability to charge a different rate. This ability already exists to be able to differentiate between a car and truck toll.

A reduced toll is likely to result in an increased number of motorcycles using toll roads, given that motorcycles constitute a minor proportion of vehicles on toll roads, any safety and traffic management impacts will be minor.

Nonetheless, the Motorcycle Council of NSW is prepared to engage in a thorough review of the safety, traffic management impacts, and technological implications of this proposal before the Final Report is issued.

End of Document

# NorthWestern Roads Group

Stakeholder Submission

# Responding to reform

NorthWestern Roads Group submission to the  
NSW Independent Toll Review Interim Report.

17 May 2024



# Introduction



This report is prepared by NorthWestern Roads Group in response to the Independent Toll Review Interim Report findings.

**Through this Submission, NorthWestern Roads Group would like to:**

- Highlight the benefits delivered by NorthConnex and Westlink M7 to the NSW road network and communities
- Communicate our support for specific Reform recommendations
- Present our understanding of the potential impact on our customers under the proposed new regime
- Outline areas for further investigation and discussion

NorthWestern Roads Group remains actively committed to working with the Independent Toll Review to further assist in Toll Reform across the network.

## Timeline

# 2005

Westlink M7 opens, being Australia's first distance-based with cap, fully electronic motorway.

# 2020

NorthConnex opens with funding considered jointly with the Westlink M7 to improve the affordability of building and using NorthConnex.

# 2026

M7/M12 Interchange and Westlink widening are due to be completed with no proposed toll increases beyond the already agreed indexation.



# Creating growth for today and tomorrow – Developing Western Sydney

**We have invested close to \$7 billion, in today's dollars, to build, operate and maintain our assets – freeing up government investment and reducing government debt.**

NorthWestern Roads has worked closely with the NSW and Federal Governments for over two decades. Our investment in the region has accelerated the growth of Western Sydney, now the third largest economy in Australia and contributes to the development of the Six Cities.

The cost of building, operating and maintaining this infrastructure requires significant investment on the part of NorthWestern Roads. To date we have invested close to \$7 billion in today's dollars to build, operate and maintain our assets.

The increased accessibility facilitated by Westlink M7 (a key freight corridor) has established Western Sydney as the undisputed hub for warehousing and logistics whilst also driving significant employment and suburban residential growth in the north-west and south-west. Mobile phone app data shows the extent of this influence across the Six Cities, with desire lines of customers using our roads going on to travel to key employment centres across Greater Sydney and beyond.

## \$7 billion is equivalent to:

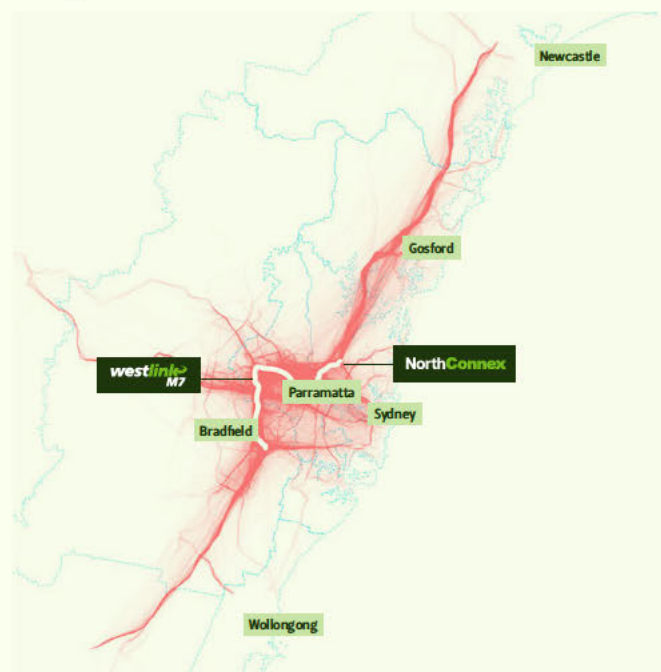


Our commitment continues with our investment into the M7-M12 Integration Project and widening of the M7, connecting Bradfield (Sydney's third city) and Western Sydney International Airport to Greater Sydney and beyond.

NorthWestern Roads oversees the road maintenance and operations of Westlink M7 and NorthConnex, with dedicated response teams to assist customers, monitor conditions for safety and maintain the entire corridor.

The current tolling regime (distance-based with cap) which exists on Westlink M7 has transformed Western Sydney and provided certainty to our customers. Our investments have delivered meaningful reductions in travel time, improved safety and reliability.

## Desire lines showing roads used by customers using Westlink M7/NorthConnex



Source: Place Intelligence

Increasing Vehicle Trips

<sup>1</sup>NSW Government, Infrastructure Statement 2023-24 Budget Paper No. 3, June 2023

<sup>2</sup>NSW Government, Infrastructure Statement 2014-15 Budget Paper No. 4, June 2014

<sup>3</sup>Commonwealth Bank of Australia, Why electric buses are the future of public transport, 15 July 2022

# Supporting Toll Reform

## Network based approach

NorthWestern Roads Group supports the recommendation of network tolling to the extent that it can be achieved whilst maintaining the value of our investment and honouring contracts.

## Distance-based tolling

NorthWestern Roads Group supports the concept of distance-based tolling. Westlink M7 was the first electronic motorway in Sydney that implemented distance-based tolling, a feature which has since been adopted on WestConnex as well as recommended by the Interim Review. Westlink M7 has distance-based tolling with a cap providing simplicity and certainty for our customers.

## Transparency for motorists

The Interim Review recommends the improvement of decision making and trip planning information available to motorists. NorthWestern Roads supports the sharing of live information on traffic conditions, transit times and toll rates providing our customers with choice on every journey.

## Congestion management

NorthWestern Roads Group supports the recommendation of time-of-day tolling to achieve congestion management across the network.

## Simplifying Toll Compliance

The Interim Review recommends the simplification and modernisation of the toll compliance process. NorthWestern Roads Group supports this and has advocated for these changes with Government for many years. This recommendation will reduce cost to the customer, improve transparency, simplicity and makes payment easier.

## Additional vehicle classes to allow for fairer charges

NorthWestern Roads Group supports fairer tolling classes and believes that the classes should reflect the value of benefits received. Aligning vehicle class definitions with those used in Victoria and Queensland allows for consistency across eastern states. NorthWestern Roads supports this concept and notes the Review has only recommended this for the motorcycle class.

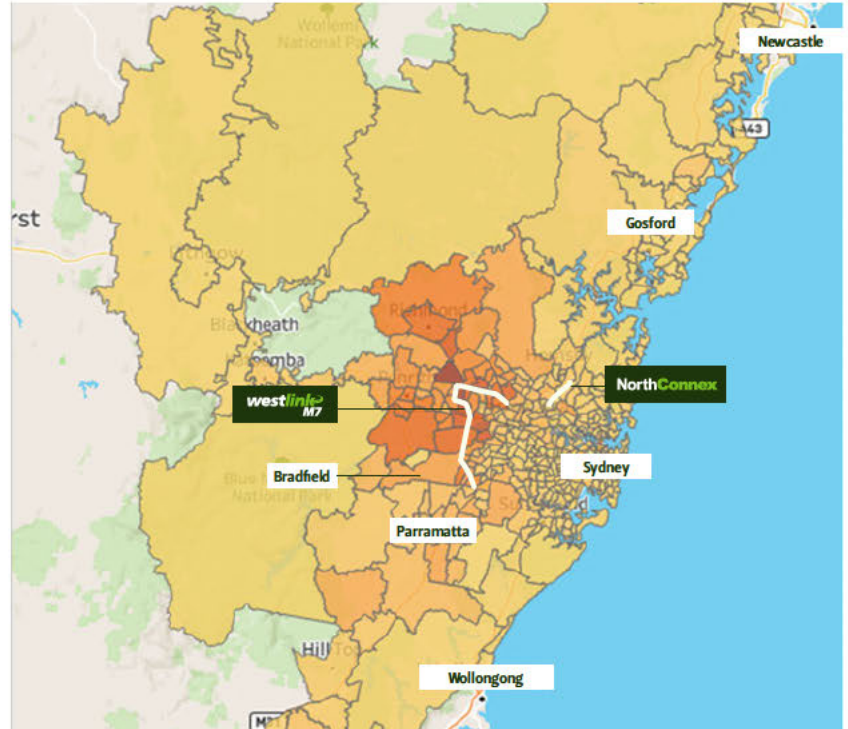


# Limited relief for Western Sydney customers

**Preliminary analysis shows that approximately 50% of the users of Westlink M7 are local to Western Sydney and only use the M7 Motorway as part of their trip.**

Applying the declining distance-based methodology and removing the toll cap could result in higher toll costs for approximately 75% of these users. The cap provides our customers with certainty that their trip costs would not exceed this limit, greatly simplifying their experience when using the Westlink M7.

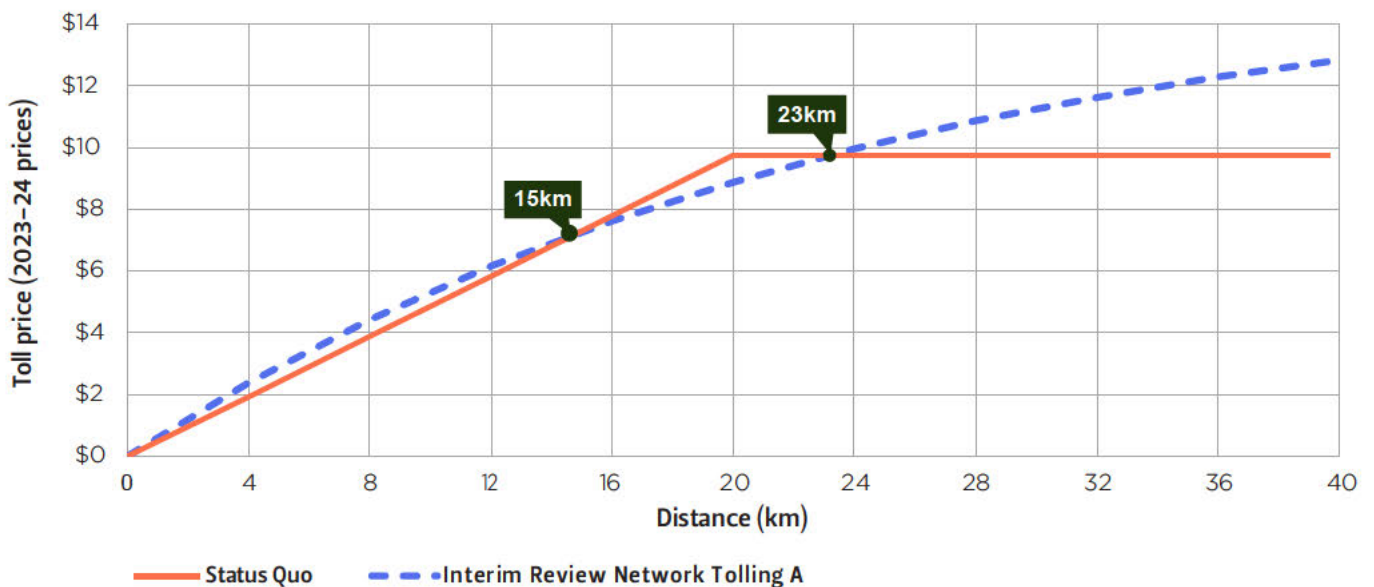
Distribution of trip origins for short distance trips (less than 15km) paying higher tolls under the proposed Interim Review regime.



Source: Place Intelligence and KPMG analysis

% Increasing Total Trip Count

## Comparison of Interim Review and Status Quo Tolls for Light Vehicles<sup>1</sup>



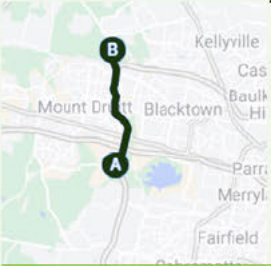
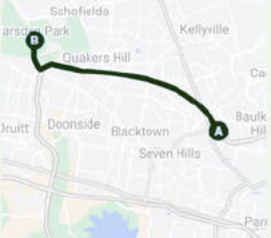
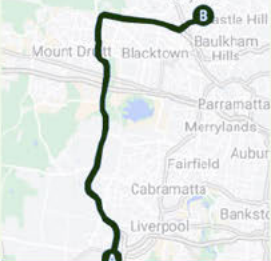
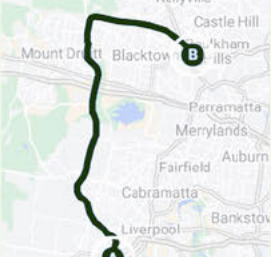
Note: The toll price comparison for heavy vehicles shares the same pattern, with tolls for heavy vehicles set at three times the cost of light vehicles.

<sup>1</sup> KPMG analysis based on Network Tolling A scenario. Toll levels expressed in 2023-24 prices. Toll rates presented in Interim Review in 2026 prices were deflated to 2023-24 prices using NSW Treasury 2023-24 Budget Paper inflation rates.

# Higher costs for Western Sydney customers

The proposed Interim Review toll rates impose a higher cost on typical customer trips.

Toll Comparison analysis of example trips: Class A Vehicles

Origin-destination pair	Status Quo Toll	Interim Review Toll	Change in toll per one-way trip	Increased cost per annum (based on five return trips per week)
 <p><b>Marsden Park – Eastern Creek</b></p>	\$4.42	\$5.20	<b>\$0.78 increase</b> <b>18% increase</b>	\$390
 <p><b>Marsden Park – Winston Hills</b></p>	\$5.84	\$6.32	<b>\$0.48 increase</b> <b>8% increase</b>	\$240
 <p><b>Norwest – Edmondson Park</b></p>	\$9.76	\$11.92	<b>\$2.16 increase</b> <b>22% increase</b>	\$1,080
 <p><b>Casula – Winston Hills</b></p>	\$9.76	\$12.82	<b>\$3.06 increase</b> <b>31% increase</b>	\$1,530

Source: KPMG analysis

<sup>1</sup>Valuations in 2023/24 prices. Traffic inputs (travel demand/travel times) are based on mid-2023 NorthWestern Roads travel demand data and Google Maps travel times, noting that current times and demand on the Westlink M7 are impacted by construction works.



# Responding to reform

## Further consideration required

### We recommend the final report include:

- Investigation into the negative impact the proposed regime has on a large proportion of our Western Sydney customers. The NSW's Government's vision for the Six Cities is to have more people working within 30 minutes of where they live. The imposition of the proposed higher tolls for shorter trips, especially for Westlink M7 customers, risks delaying this vision and detracting from living and doing business in Western Sydney.
- Certainty that Government will honour existing contractual obligations that has seen concessionaires invest billions of dollars.
- Further clarification of the purpose and proposed framework for regulation.
- Consideration to the simplicity of a "cap" as opposed to declining distance-based tolling – using the M7 cap and its simplicity for customers as an example.
- Analysis to understand additional pressure on the arterial road network, particularly in Western Sydney, which is already under strain.
- Consideration of new tolling classes for larger, higher productivity vehicles (AB-Triples and B-Triples) to address lost motorway capacity and increased safety and maintenance costs.



# NSW Toll Road Partners

Stakeholder Submission

**Professor Allan Fels AO**  
**Dr David Cousins AM**  
NSW Independent Toll Review  
Via: [tolling\\_pmo@transport.nsw.gov.au](mailto:tolling_pmo@transport.nsw.gov.au)  
CC: NSW Premier Hon Chris Minns MP  
NSW Treasurer Hon Daniel Mookhey MLC  
NSW Roads Minister Hon John Graham MLC

14 May 2024

**Commitment to work with Government from NSW Toll Road Partners**

Dear Prof Fels and Dr Cousins,

As owners of toll roads in Greater Sydney, we each thank you for your ongoing engagement as part of the NSW Independent Toll Review.

The toll road network across Greater Sydney has been vital in serving motorists, the community and the economy, and will continue to play a critical role as the population grows. There are a combined one million trips on our roads across this metropolitan region every day.

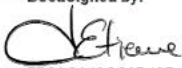
We are each supportive of reform that delivers greater efficiency and simplicity for these motorists and the wider network.

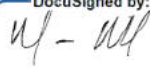
Noting the Interim Report's concerns over timing and complexity, and a desire for "early reform", we each confirm our willingness to work with the NSW Government to expeditiously develop a suitable network-wide solution.

We each believe the principles of such a solution could be agreed within a short period of time, and in advance of the conclusion of the Government's existing rebate schemes in December 2025.

We each have a track record of variously working together and with Government, within existing regulatory frameworks, and respectful of contractual arrangements, to achieve outcomes for motorists and the people of NSW.

**This statement is signed by:**

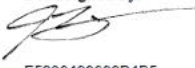
DocuSigned by:  
  
F7CAG449CC3D43F...  
Jean-Étienne Leroux  
For: Caisse de dépôt et placement du Québec (CDPQ)

DocuSigned by:  
  
3D2D2713A12F475...  
Marcus Christopher Hill  
For: Platinum Tawreed Investments A 2010 RSC Limited, a wholly owned subsidiary of the Abu Dhabi Investment Authority


DocuSigned by:  
  
EAA377928EC34AF...  
Nick O'Neil  
For: AustralianSuper Pty Ltd as trustee for AustralianSuper

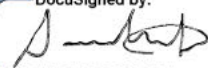
DocuSigned by:  
  
F774B884E2AE462...  
Leisel Moorhead  
For: QIC Private Capital Pty Ltd on behalf of its managed funds and clients



DocuSigned by:  
  
F5290480682B4B5...  
Paul Bernath  
For: Canada Pension Plan Investment Board

DocuSigned by:  
  
09FD88394B2B45D...  
Michael Hanna  
For: IFM Investors

DocuSigned by:  
  
2F36CEDE028C4F2...  
Michelle Jablko  
For: Transurban

DocuSigned by:  
  
77ACE9E0F6C8461...  
Sandra Lee  
For: UniSuper Limited as Trustee of UniSuper Superannuation Fund

Philip Laird, University of Wollongong

Academic Submission

## Supplementary submission to the Independent Toll Review

*Philip Laird, University of Wollongong*     April 2024

This supplementary submission is in two parts: firstly some quick responses to the March 2024 Interim report of the Toll Review; and, secondly some general comments. This submission has drawn on research undertaken at the University of Wollongong but it is an independent one.

As per my primary submission of July 2023, some Sydney motorways have charges that can be considered too high and others have charges that can be considered as too low.

### 1. Comment relating to the Interim report of the Toll Review

A. I support each of the 15 findings in the Interim Report, and particularly the finding that ***“Toll reform is preferable to toll relief.”***

I also support each of the 32 recommendations in the report. In particular, I support (#10) The NSW Government should investigate a new classification for mid-class heavy vehicles to incentivise these vehicles to use toll roads, (#12) The NSW Government should simplify the arrangements allowing public bus services to be exempt from tolls to ensure consistency across the network; and, (#16) NSW Government should establish a government-owned special purpose entity (‘State TollCo’) with responsibility for improving outcomes and transparency for motorists to strengthen governance and accountability over NSW toll roads.

In regards to a new classification for mid-class heavy vehicles, some attention could be given to Light Commercial Vehicles.

Re heavy vehicles, there could be more controls on the use of local roads to require more use of tollways by heavy truck operators.

Comment could also be given on the Rozelle interchange.

B. Frequent reference is made to PPPs or Public Private Partnerships. Too often PPPs end up as the ***Public Perpetually Pays***.

The first toll in NSW could have been that imposed by Governor Macquarie c1811 for a road from Sydney to Parramatta.

As before, tolls could and should be used for motorway upgrades. They were used from the 1960s to December 1988 to progressively upgrade the section of the Pacific Highway between Berowra and Gosford. The tolls were removed at the request of the Federal Government which then did not want to see its National Highway System have any tolls. Here, it is of note that intercity tolling on motorways works well in many overseas countries.

Tolls were also used from the 1970s to 1996 on the Waterfall – Bulli motorway. The State government of the day could have kept the toll as a source of revenue to expedite further upgrades of the Princes Highway.

One such upgrade, which is now long overdue, is grade separation of an intersection at the foot of the Mt Ousley road within the City of Wollongong. It could do with more funds to ensure that the original proposal to build a pedestrian/cycle overbridge over the Mt Ousley road.

This writer would like to see more tollways run by the NSW government with less in the private sector, and certainly less run by one particular company.

C. As before, in 2003, the NSW Parry Report recommended, inter alia Charging for road use as follows: *Any implementation of road use pricing must be accompanied by rationalisation of the current taxation of motorists.*

*As a separate issue, undertake a joint review with the Federal Government of taxation, expenditure and other policies that are detrimental to public transport compared with private transport.*

*Following consultation with the community and stakeholders, consider implementing electronic road pricing (ERP) within the next 5–10 years as a means of effectively signalling to the community the external costs of road use—congestion, pollution, road wear and tear and accidents.*

*In the intervening period, take steps to facilitate the introduction of ERP, such as introducing two-way tolling and harmonising tolls across existing and new tolled arterials.*

In 2009, the Henry Tax Review noted that **“Current road tax arrangements will not meet Australia's future transport challenges.”**

The Henry Tax Review made several pertinent recommendations for road pricing reform. These included **Recommendation 61:** Governments should analyse the potential network-wide benefits and costs of introducing variable congestion pricing on existing tolled roads (or lanes), and consider extending existing technology across heavily congested parts of the road network. Beyond that, new technologies may further enable wider application of road pricing if proven cost-effective. In general, congestion charges should apply to all registered vehicles using congested roads. The use of revenues should be transparent to the community and subject to further institutional reform.

D. I wish to commend for consideration the option put forward by Prof David Levinson (Transportist Newsletter [transportist@substack.com](mailto:transportist@substack.com)) to transform the Sydney toll network into something that adds to social welfare rather than just augment many an Australian's superannuation (retirement) fund.

As of writing on 22 April 2022 “the market value of [TransUrban](#) is AU\$ 39.62B. (~US\$25B at today's exchange rate).

Who owns it? It's largely institutions. For instance the [UniSuper superannuation fund](#) (...) holds a large chunk of this, as well as being a major capital investor on motorways for which TransUrban is the lead investor. Unisuper's Balanced Portfolio alone holds AU\$1.4B of TransUrban stock. You can see the TransUrban annual reports [here](#) which provide some more disclosure.

About half of that value is their operations in Sydney, according to their annual reports. That's a lot of money ... but also it isn't.

Suppose New South Wales (with or without cooperation from other states or the Commonwealth) buys out the company and its partners and sells off the non-local bits, the net cost is about \$20B (*plus a bit more for the motorways for which TransUrban is only a partial investor*). New South Wales also gets to keep the stream of future revenue using whatever tolling strategy it wishes, which can be used to guarantee the bonds issued to finance the takeover.

We can imagine lots of ways of doing this, all requiring some legal authority of course, but nothing that has not been done in the past when acquisition at fair market prices of private assets was thought to serve the public interest — and what's more fair market than stock valuations. “

“Paid out of general revenue, over 20 years, \$20B at \$4000 per Sydneysider (at 5 million Sydneysiders and 0% interest and inflation) is \$200 per year, or less than

\$0.55 per day. Adjust assumptions to get more precise estimates, but this is obviously a feasible policy choice. And that assumes just removing tolls from motorways, which is an unwise outcome.”

Some assistance from the Federal Government to sort out the present tollway mess and to address road pricing would be in order.

A FURTHER OPTION may be to see if the Australian Future Fund could assist in resolving the Sydney tollway problem.

E. Greenhouse gas emissions get brief mention in the report. It is recommended that more attention be given in the final report on the need to reduce emissions in transport to assist in meeting targets set by both the NSW and the Australian governments.

See for example <https://www.transport.nsw.gov.au/projects/environment-and-safety/environmental-sustainability>

## 2. General Comment

What follows is a summary of some points raised in my primary submission.

A. More freeways and tollways have been built in Sydney, yet road congestion increases. It is clear that some road vehicle demand management is needed. This could be by way of a congestion tax and or increased fuel excise.

The decision to put the Eastern Harbour Tunnel on hold is supported.<sup>1</sup>

B. As noted in the 2022 BITRE Infrastructure Statistics Yearbook (Table 5.3a) the urban rail passenger task for Sydney grew from 5.56 billion passenger kilometres (bpkm) in 2009-2010 to 7.69 bpkm in 2018-19. This was an extraordinary growth of 38 per cent.

This growth the urban rail passenger task far exceeded the growth in road passenger use by cars for in Sydney going from 44.62 bpkm to 48.56 bpkm over this time – a growth of nearly 9 per cent.

The growth the urban rail passenger task also exceeds population growth.

For Sydney to be a more liveable city, there needs to be a curb on the growth of road vehicle use, and more use of public transport and active transport. The rail system needs to be further expanded within Sydney.

C. Heavy Vehicles

The regulation of heavy truck movements, and recovery of road system costs from heavy trucks present a real challenge. This has long been recognized with a series of inquiries at a NSW and national level and include that in 2009, the Henry Tax Review noted that *“Current road tax arrangements will not meet Australia's future transport challenges.”*

The Henry Tax Review made recommendations for heavy vehicle road pricing reform that included

**Recommendation 62:** The Council of Australian Governments (COAG) should accelerate the development of mass-distance-location pricing for heavy vehicles, to

ensure that heavy vehicles pay for their specific marginal road-wear costs. Revenue from road-wear charges should be allocated to the owner of the affected road, which should be maintained in accordance with an asset management plan. Differentiated compliance regimes to enforce this pricing policy may need to be considered to balance efficiency benefits from pricing against the costs of administration and compliance for some road users.

Mass distance location charges for heavy trucks in Australia are long overdue. As the 2015 Harper Review into Competition Policy found

*Roads are the least reformed of infrastructure sectors, with little change to institutional arrangements around provision and funding over the past 20 years. Lack of suitable road pricing models leads to inefficient investment decisions and creates distortion on the choices users make between different modes, particularly between rail and road freight.*

If one accepts that the current New Zealand charges with mass distance pricing are user pays, then the operation of six axle semitrailers and the nine axle B-Doubles on public roads (with details below) are in receipt of an annual hidden subsidy of about \$2 billion per year. This averages to about one cent per net tonne kilometre. More details can be supplied on request.

External costs of articulated truck movements including road crash risk, emissions, and road congestion but excluding unrecovered road system costs are broadly estimated at over one (1) cent per net tonne km in non-urban areas and over two (2) cents per net tonne km in urban areas.

These costs, which far exceed the external costs of rail freight, were addressed by a 2012 report by the NSW IPART on grain transport. In aggregate, they amount to at least \$2 billion per annum, and this is on top of a demonstrable under-recovery of road system costs of a further \$2 billion per annum from the operators, and their clients, of B-Doubles and long distance heavily laden semitrailers.

E. Attached to this submission is a comment on the general situation for Sydney some 33 years ago was aptly summarised by John Laird writing in the Consumers' Transport Council (CTC) *Newsletter* of June 1991.<sup>2</sup>

F. Conclusion

The approach taken by the Inquiry in its Interim Report is commended. However, it is recommended that more attention be given on how improved tolling arrangements can reduce emissions.

Many of the issues raised by the 2003 Parry Report and other reports that were not addressed by the government of the day now need to be revisited.

We owe our own generation and future generations an improvement on the present situation in Sydney.

A/Prof Philip Laird OAM, PhD, FCILT, Comp IE Aust

Faculty of Informatics

University of Wollongong NSW 2522

[plaird@uow.edu.au](mailto:plaird@uow.edu.au)

26 April 2024

## SYDNEY REJECTS ITS MEDICINE

Sydney, as we well know, has growing pains. Our unique combination of private enterprise, a multitude of local governments, the NSW State Government, Quangos (quasi-autonomous government organisations) and a remote Federal Government (hereinafter called 'The System') have created over the years the monster megalopolis by the simple practice of lurching from crisis to crisis.

Every now and again, the chronic sickness becomes acute by the eruption of one symptom or another, and acute pain draws attention to the problem. Rarely, however, is there a good doctor to be found – and too often, when the problem is diagnosed, the patient flatly refuses to take the medicine prescribed.

Often, the patient's relatives (you and I) and 'The System' just simply refuse the good doctor's advice in terms such as 'it costs too much', 'the cure will take too long', and 'the operation is too painful'. Or, 'if we talk about it for long enough we will get used to the pain and the operation won't be necessary.'

With few exceptions, such as Bradfield's plans for the early 20th century, this is the kind of thinking that has since dominated the growth of Sydney. Indeed this approach is also destroying the economic and social health of most other Australian cities.

The response to date of 'The System' has been the creation of further suburbs on the periphery of an already swollen city with more roads, more cars, more shopping centres – indeed more everything. All of this is at the expense of our health and quality of life with air pollution, congestion, family isolation, and loss of countryside. The distances we are required to travel reduce our opportunities for sport and leisure, and place on many working people the burden of high travel costs in terms of time and money.

Compounding the existing problems that include waste disposal and air pollution eroding the best work of our architects and engineers over the last 200 years are proposals for a third runway at Sydney's main airport ...

The cures to these problems for cities approaching four million people are well researched and documented. The first prescription, historically tested and demonstrated in many European and Asian cities, is high-density development of the inner city. This makes possible full economic use of the infrastructure of the city at the same time freeing chosen areas to provide parks – even forest enclaves – along with increased inner city population.

Restraint on suburban sprawl is effected by similar controlled development in satellite cities – each equipped with modern social facilities interlinked with equally modern light rail transit systems.

Such regional development can be shown to give enormous savings to the community. The number of motor cars could be reduced dramatically. With such a reduction, the amount of parking space, road construction and maintenance, pollution, noise and road crashes would be reduced for the benefit of all.

'The System' must do better.

Faster trains are also needed between Sydney and Wollongong where express trains have an average speed of just 55km/h. This is far slower than Perth-Mandurah's average of 90km/h. Brisbane Gold Coast trains (Central-Robina) average 68 km/h.

Some parts of regional NSW are served by XPTs use trains built in the 1980s running over track with 'steam age' alignment. These XPTs will not last forever. As

constructing 400km of new track to modern standards (easy curves and grades) on the Main South and North Coast lines to replace over 500km of torturous alignment. The benefits include faster freight trains as well as faster passenger trips.

Since the late 1980s over 200 km of track on Queensland's North Coast line between Brisbane and Cairns has been rebuilt on improved alignment for faster and heavier freight trains. Plus the introduction in 1998 of the Queensland tilt train moving on good track at speeds of 160 km/h. Track straightening in New South Wales was also recommended during 1998 in a NSW Parliamentary Report called "The Tilt Train."

In contrast to no action on the part of the NSW Government, the Victorian Government in 1999 embarked on a Regional Fast Rail program that included track upgrades on four lines and new trains. The new services started in 2006 with trains moving up to 160 km/h. Within four years, the patronage had doubled.

An incremental approach to High Speed Rail, starting with some sections of new track and new trains capable of 200 km per hour, is quite possible this decade. Such trains could well be extended to Canberra.



**Name:** Philip Laird

**Do you have any feedback on the Interim Report?**

I support each of the 15 findings in the Interim Report, and particularly the finding that “Toll reform is preferable to toll relief.”

I also support each of the 32 recommendations in the report. In particular, I support (#10) The NSW Government should investigate a new classification for mid-class heavy vehicles to incentivise these vehicles to use toll roads, (#12) The NSW Government should simplify the arrangements allowing public bus services to be exempt from tolls to ensure consistency across the network; and, (#16) NSW Government should establish a government-owned special purpose entity (‘State TollCo’) with responsibility for improving outcomes and transparency for motorists to strengthen governance and accountability over NSW toll roads.

**Do you have any other recommendations you would like the Review to explore?**

Yes, please see my six page attachment. In short, how a better tolling system can reduce greenhouse gas emissions from transport could usefully be addressed. Also the Rozelle interchange problems need addressing. An idea (due to Prof Levinson) of buying out a dominant Toll road company could also be explored.

**What are your views on adopting network pricing for toll roads in Sydney?**

To be preferred to present arrangements.

**What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.**

Would like to see tied in with time of day/congestion pricing.

**Setting network tolls with periodic adjustments?**

Better than the present arrangements which are generous to a certain toll operator.

**What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?**

Yes, IPART should be involved, as their procedures also encourage public input,

**Having an independent, external dispute resolution function for the toll road industry?**

Yes.

**What are your thoughts on disclosing the full details regarding the setting of toll price?**

More transparency needed

**What additional details would make you more confident that toll prices are set appropriately?**

Traffic volumes and revenues.

**Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.**

The three stage approach is commended. The current toll landscape needs to change.

**What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?**

Toll relief should be phased out.

**What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?**

If toll relief is offered, it should be effectively means tested and available to individuals only (and not company cars)

**What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?**

Online trip planning can not only save time, but in some cases fuel and hence reduce emissions.

**Do you think this will better inform your decision to use a toll road?**

Yes

**What other features would you like to see implemented?**

Consider tolls on the arterial roads leading in and out of Sydney.

# Queensland Investment Corporation (QIC)

Stakeholder Submission



14 May 2024

Professor Allan Fels AO and Dr David Cousins AM  
Review Chair and Deputy Chair  
Independent Toll Review – NSW Government  
Via email: Tolling\_PMO@transport.nsw.gov.au

### **Submission in response to NSW Independent Toll Review – Interim Report March 2024**

QIC is pleased to provide this submission in response to the Interim Report for the 2023 Independent Toll Review in New South Wales.

We welcome the opportunity to work with NSW Government in its ongoing effort to deliver greater value to toll road customers and further improve efficiency of Sydney's road network, whilst acknowledging the significant investment made by Australian superannuation funds in Sydney's motorway network.

There are many informative findings in the Interim Report, however, the report raises many questions and concerns that require further detailed exploration and consideration. We have limited our points in this submission to the most material.

### **About QIC**

QIC is a long-term specialist manager in alternatives offering infrastructure, real estate, private capital, liquid strategies and multi-asset investments. It is one of the largest institutional investment managers in Australia, with A\$106bn (US\$72.5bn) in funds under management (as at 31 December 2023).

QIC manages significant investments in New South Wales, including investments in toll road concessions, property, healthcare facilities and renewable energy. These investments are made to meet the retirement needs of the beneficiaries of our clients which include Australian and international superannuation and pension funds.

QIC, on behalf of its managed funds and clients, manages an interest in Northwestern Roads Group ("NWRG") that owns the Westlink M7 toll road concession and the NorthConnex tunnel concession.

### **Risk of adverse impacts on Western Sydney toll road users**

The Interim Report provides high level commentary on which geographic groups might be subject to higher or lower tolls, noting that 30 per cent of users are likely to pay lower tolls and 40 per cent of users are likely to pay higher tolls. However, the Interim Report does not include any supporting materials, including the in-depth traffic assessment and modelling, clearly identifying scenarios modelled.

It is not clear in the Interim Report how customers of Westlink M7 and NorthConnex might be impacted. It is therefore difficult to have confidence that the proposed reform will achieve its objectives and enhance the efficiency and fairness of tolls for users of these motorways.

We are concerned about adverse impacts on the users of Westlink M7 in Western Sydney in light of the current cost of living pressures. Preliminary analysis by NWRG shows that ~50 per cent of the users of Westlink M7 are local to Western Sydney and are only travelling on the M7 motorway ("Local M7 Trips"). This reflects the important role that Westlink M7 plays in connecting key economic growth areas in Western Sydney such as Western Sydney Employment Areas and Western Sydney Aerotropolis with the local Western Sydney population. Based on the preliminary analysis conducted

#### Disclaimer

QIC respectfully acknowledges the Traditional Owners and Custodians of Country throughout Australia and recognises their continuing connection to land, water and community. We pay our respects to Elders past, present and emerging.

by NWRG, applying the proposed declining distance based charge could adversely impact ~75 per cent of the Local M7 Trips who are likely to pay higher tolls as a result of the reform.

Westlink M7 is the lowest cost toll road in Sydney on a per kilometre basis:

- there is no flagfall charge;
- tolls are linked to CPI (both escalation and de-escalation)
- tolls are distance based subject to a 20km cap.

We encourage the NSW Government to disclose more details around traffic and toll analysis to provide confidence that objectives of the Independent Review can be met.

It would also be beneficial to see a comparative assessment of the declining distance-based tolls versus other potentially less complicated toll options (i.e. distance-based toll including a network cap). This assessment should show how each option impacts various user groups based on the objectives of the Toll Review, such as cost of living impacts, fairness and simplicity of tolling arrangements to avoid customer confusion.

In relation to equity, it would be helpful to understand how the NSW Government is thinking about the future of the holistic transportation subsidy programme. For example, if the NSW Government chooses to end the \$60 weekly toll cap rebate and 40 per cent toll relief rebate schemes while maintaining M5 South-West Cashback scheme and Opal \$50 weekly public transport cap, how does this satisfy equity and fairness objectives of the Toll Review both in the short and in the long term.

We also encourage the NSW Government to work directly with toll road operators to further develop toll reform solutions and avoid unintended negative consequences on the population of Western Sydney.

### **Clarity around the proposed regulatory framework**

The details around the proposed regulatory framework are unclear. Regulatory regimes are technically complex and generally involve setting of a regulatory asset base and investor return requirements to determine the price where an asset has been sold in perpetuity i.e. not a limited concession. While regulatory regimes are relatively common amongst infrastructure assets domestically and globally, the Interim Report proposes a novel regime construct where single tariff is set across multiple market participants.

Under the current concession agreement framework, which has been in operation for over 20 years, the toll road operators take traffic risk, operational and capital cost risk as well as financing risk. For example, during a pandemic or a financial recession, the decline in revenue was solely a cost to the toll road company without any support from government.

If the regulatory framework shifts traffic risk away from the toll road operators to an economic regulation model, would toll road operators be able to increase toll prices in the periods of suppressed demand to receive return on and of capital? If this is the case, this might put even higher pressure on toll road users in Sydney and create further disparity in the system.

A change in the risk allocation, where government takes more operational or patronage risk could ultimately come with greater uncertainty and at a higher cost to commuters and government.

We encourage the NSW Government to consider further whether a complex and costly regulatory framework imposed over the top of the existing concession agreements is required to meet the objectives of the toll reform.

### **Clarity of costs and benefits to the State of NSW**

Ordinarily, the introduction of a large complex scheme which is a fundamental and structural policy change requires a detailed cost-benefit analysis. In the current report, there is an absence of analysis confirming benefit to the economy of NSW (i.e. comprehensive cost-benefit analysis). As noted by the NSW Treasury, cost-benefit analysis is applied to weigh up risks and benefits versus costs to ensure the NSW Government delivers the best possible outcomes for the people of NSW. Clear cost-benefit

analysis guidelines are published on the NSW Treasury website, and they are consistently used in developing other policy reforms or independent reviews.

Without a rigorous cost-benefit analysis, there could be potential unintended consequences from the reform which could end up being NPV negative to the State, with major costs to set up and run new governing bodies and additional investments in infrastructure to operate, while it is unclear if total tolling burden on customers will be reduced.

We encourage the NSW Government to undertake and share with the public, a comprehensive cost-benefit analysis prior to any toll reform implementation to ensure the best possible outcomes are delivered for the people of NSW.

### **Complexity of change**

Whilst the introduction of a network pricing system could provide benefits to road users if implemented appropriately at the establishment phase, the proposal set out in the Interim Report to retrofit a complex regulatory framework over the top of the existing concession agreement has a high degree of complexity to implement with consequential higher risk of ongoing dispute.

The complexity of the proposed changes should not be underestimated, both in time and cost to implement. We encourage the NSW Government to consider implementation of the similar policies and legislative precedents, both domestically and globally. For example, consider any take aways from the rail reform implementation in the UK, including the key findings from the report produced by the UK's National Audit Office *Rail reform: the rail reform transformation programme* from March 2024.

In addition to the establishment, there is ongoing increased administrative complexity, which may create the risk of dispute and litigation. The Interim Report does not clearly identify or quantify risks associated with the annual adjustment mechanism and does not consider other options that would support implementation of the reform. We would encourage consideration of a one-off adjustment or reset, which would reduce costs and eliminate the need for the complexity and cost of new regulation.

### **Investment certainty – change to risk profile for all stakeholders**

As an investment manager on behalf of institutional investors with long term investment horizons, investment certainty in the concession structure and known risk allocation underpinned:

- the original investment in Westlink M7 in 2009,
- significant additional investment to deliver the NorthConnex Tunnel that has been operational since 2020, and
- the additional investment to deliver M7-M12 Integration Project that includes the widening of the Westlink M7 toll road which is currently in construction.

The \$1.7bn M7-M12 Integration Project is largely funded by the private investors valuing the uplift in traffic and concession extension, with no increase in tolls and no introduction of a flagfall. If the proposed legislation impacts risk allocation profile, including traffic risk, this might significantly impact value of the project that was accepted by the NSW Government less than 18 months ago (in December 2022).

The option of legislating to override the key terms of the existing contracts creates concern in considering further investments in NSW. Institutional investors see significant opportunity for future investment in NSW, however, the precedent of governments legislating to implement a new regulatory regime that changes existing contracts and associated risk profiles creates major uncertainty for both private equity and debt providers. This will likely result in reduced future appetite or increased risk premium for private sector's investment in the State's infrastructure.

The Interim Report acknowledges that toll road operators have valid interests to be protected. However, there is insufficient detail in the Interim Report to understand how the ultimate beneficiaries' interest will be protected.

We would like to see greater clarity on how the proposed legislation and regulatory approach impacts the financial position and risk profile of private investors both debt and equity over the remaining life of the concessions. In this respect, it would be helpful if the final report could provide a more detailed revised industry risk allocation matrix.

We encourage the NSW Government to extensively engage with relevant stakeholders prior to any toll reform policy implementation to ensure future State's investment requirements can be supported.

### **Alternate solutions**

The NSW government has a long history of working with private sector investors to deliver infrastructure benefits for the people of NSW. The NorthConnex Tunnel is a good example of bringing forward the timing of delivery of infrastructure for the benefit of the local community. The NorthConnex Tunnel has resulted in reduced travel times and congestion on Pennant Hills Road. With reduced congestion there is lower emission and improved air quality and noise and improved safety for the local communities.

In the Interim Report there is a statement that it is unlikely that all parties involved will agree to genuine reform. The review thus far has had an absence of collective concessionaire engagement to explore potential alternate solutions. QIC believes that there is strong possibility that the parties can agree to reform in good faith.

Over time, QIC has worked with different governments to develop solutions to meet the needs of government. In this case, there are many different alternative options open to the government to deliver toll reform for the benefit of toll road customers whilst balancing the long-term interest of the investors to meet the retirement benefits of superannuants without the need for legislation. If the objective is to reduce tolls for those that use the motorways the most, we believe that there are alternate solutions are simpler and less costly to implement.

QIC also has had significant experience in managing toll road assets on behalf of the Queensland Government, having previously managed Queensland Motorways Limited – the majority holder of toll road concessions in South East Queensland.

Our experience with managing and transitioning concession-based assets on behalf of the State of Queensland has continued when in 2021 QIC played the lead role in acquiring and transitioning the Queensland land and water titles registries. QIC manages on behalf of its clients 100 per cent of the new corporatised entity. The acquisition of Titles Queensland by QIC reflects the corporation's strategic approach to managing essential services and infrastructure assets, ensuring they are operated efficiently and continue to meet the needs of the community and stakeholders.

We welcome ongoing engagement with the NSW Government to continue to develop solutions.

Yours sincerely



Leisel Moorhead  
**QIC Private Capital**  
**On behalf of its managed funds and clients**

# Roads Australia

## Stakeholder Submission





14 May 2024

Professor Allan Fels AO  
Independent Chair  
NSW Independent Toll Review 2024

(submitted via [tolling\\_pmo@transport.nsw.gov.au](mailto:tolling_pmo@transport.nsw.gov.au))

### RA Submission to the Independent Toll Review Interim Report for NSW government

Dear Professor Allan Fels AO,

Roads Australia (RA) appreciates the opportunity to provide this submission on the Independent Toll Review Interim Report for NSW government (**Interim Report**).

This submission is based on input received from a range of RA members responding to various aspects of the Interim Report.

The Interim Report provides a comprehensive overview of the issues that have emerged in the toll road sector in NSW, with potential learnings for other regions.

Generally, the feedback from our members is a request for further details on the implementation and the workings of any proposed regime, including the role of proposed State Toll Co and the scope of the proposed legislative change.

In particular, the submissions raised concerns about the potential impact of the proposed coordinated network system of tolls and pricing system. Such concerns include:

1. the rights of toll road operators to have stability with respect to operating conditions for the period of concession. Any legislative change impacting the long-term contractual arrangements may entitle toll road operators to seek compensation;
2. the uncertainty around the future toll prices affecting investment confidence and the State's reputation as a safe and stable region for investment, introducing sovereign risk as a factor for future private infrastructure investment in NSW;
3. the uncertainty and risk for the banking sector, including the possibility of breaches which necessitate the immediate repayment of loans; and
4. potential material income tax and stamp duty imposts triggered by any changes to the operation of concession agreements.

Also focusing solely on the profitability of existing toll roads was considered to downplay the technical and commercial risks associated with building and managing these assets. Historically, private sector bidders for toll road projects have had to assume significant construction and demand risks. Many contractors have struggled to manage construction risks and many toll road concessions have incurred losses due to overestimation of initial traffic volumes. Private investor returns take into account the risks allocated to them. These risks should be considered as part of the decision to move to a State Toll Co model.

Some members have also highlighted the advantages of funding road delivery and operation from toll revenue instead of relying on a state budget process. Tolls enable the 'user pay' principle, allowing government to cover the cost of construction, operation, and maintenance. Consequently, there is some support for continuing to adopt the existing approach. Particularly in the context of KPMG May 2021 data estimating Sydney's tolled motorway network to 2051 will contribute A\$5.6 billion on average per year in economic benefits to all road users.

Should you wish to discuss this further, please do not hesitate to contact me.

Yours sincerely,

**Ehssan Veiszadeh**

Chief Executive Officer

M: +61 418 986 206 | E: [ehssan@roads.org.au](mailto:ehssan@roads.org.au)

**Name:** Robert Bain (RB Consult)

**Do you have any feedback on the Interim Report?**

Please see the attached Powerpoint presentation. Note that this had to be degraded to meet your file size constraint. A full-resolution version can be supplied.

**Do you have any other recommendations you would like the Review to explore?**

Our presentation addresses the issue of the price v. value of Sydney's toll roads from a consumers' perspective.

# RB Consult

## Stakeholder Submission

# Pricing Reviews are Important (and Necessary) but Don't Overlook Value

Submission to the Independent Toll Review, NSW

**Robert Bain | Sylvain Sénéchal | Deny  
Sullivan**



**LONDON/OTTAWA | April 2024**

# Summary

- The traditional price metric used in the toll road sector (cents per mile) is a poor and unreliable indicator of consumer value
  - Drivers equate 'value' with time savings
- In this presentation we demonstrate how to measure value from a consumers' perspective
  - ...and we use it to benchmark all the toll roads in Sydney. How do they compare?
- Our approach is quick, simple and inexpensive to apply
  - ...and can be easily updated to track trends, monitor system performance (on a consistent basis) and inform pricing adjustments
- We ask that the Independent Toll Review considers both price **and consumer value** in their terms of reference.



# Independent Toll Review, NSW

- **Our Submission**
  - Introduction
    - Price (cost per mile) versus value (cost per minute saved)
  - Applying our metric - experience to date
  - Focus on Sydney
    - Our 6-stage approach
  - Research results
- **Appendices**
  - A: Independent validation of our results
  - B: Time savings by time-of-day for all of Sydney's toll roads

# Introduction

Price (cost per mile) versus value (cost per minute saved)



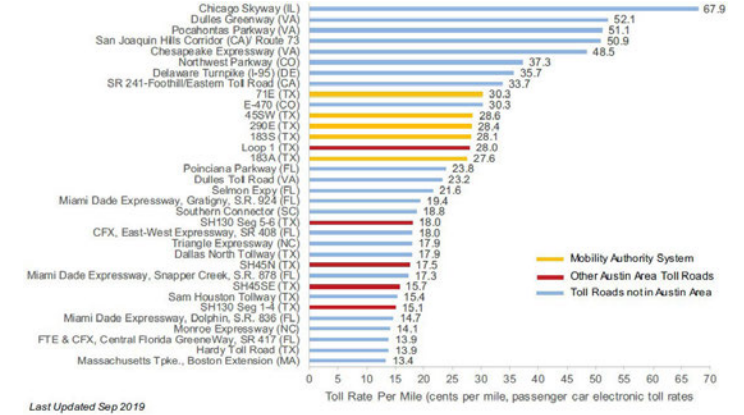
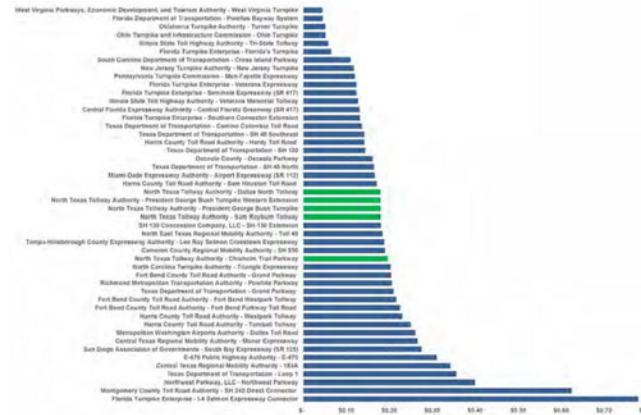
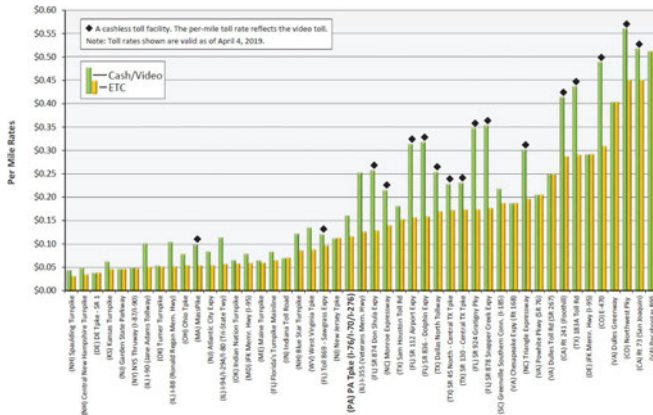
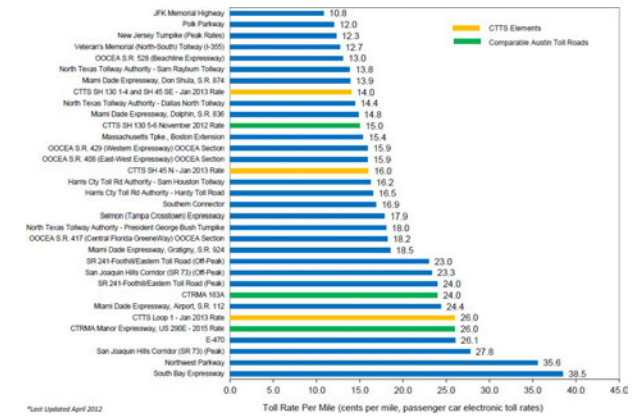
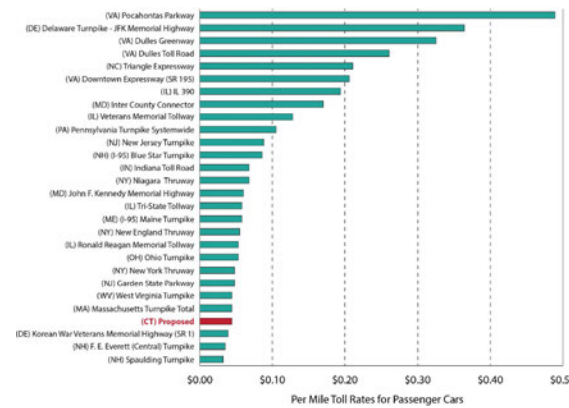
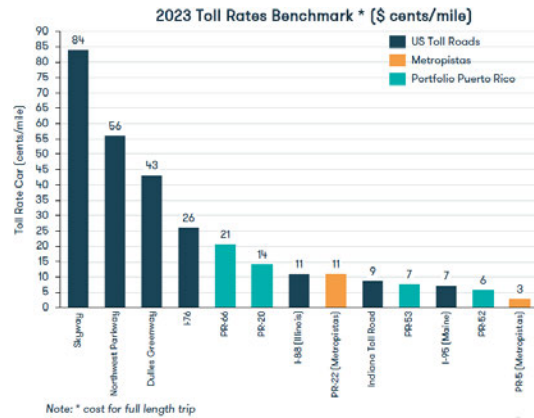
# Independent Toll Review

- Interim Report (Executive Summary):
  - *“An important theme of this report is the need to have a coordinated network pricing system based on simpler principles than at present”.*
  - *“This will enhance the efficiency and fairness of tolls and help motorists to have a better understanding of the cost of their trips”.*
  
- Our response:
  - In our experience, the toll road sector - internationally - over-focusses on price (cost) and commonly loses sight of value
    - It is no coincidence that calculating price is simple and straightforward.
    - Calculating value takes a little more effort!



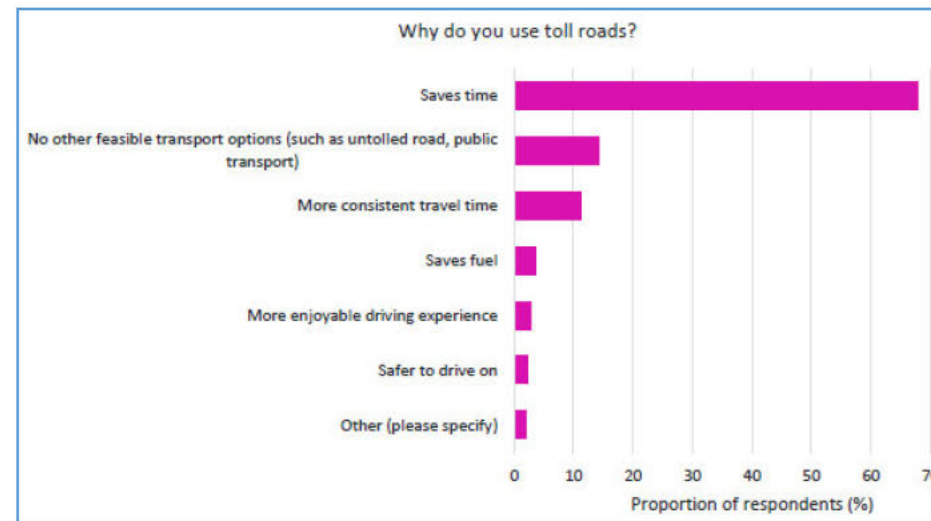
# Toll Road Benchmarking Metrics

- Traditionally, the toll road sector's primary focus has been on cost per mile comparisons:



# Why Do Drivers Use Toll Roads?

- However, consumers primarily derive value from toll roads in terms of **time savings**:

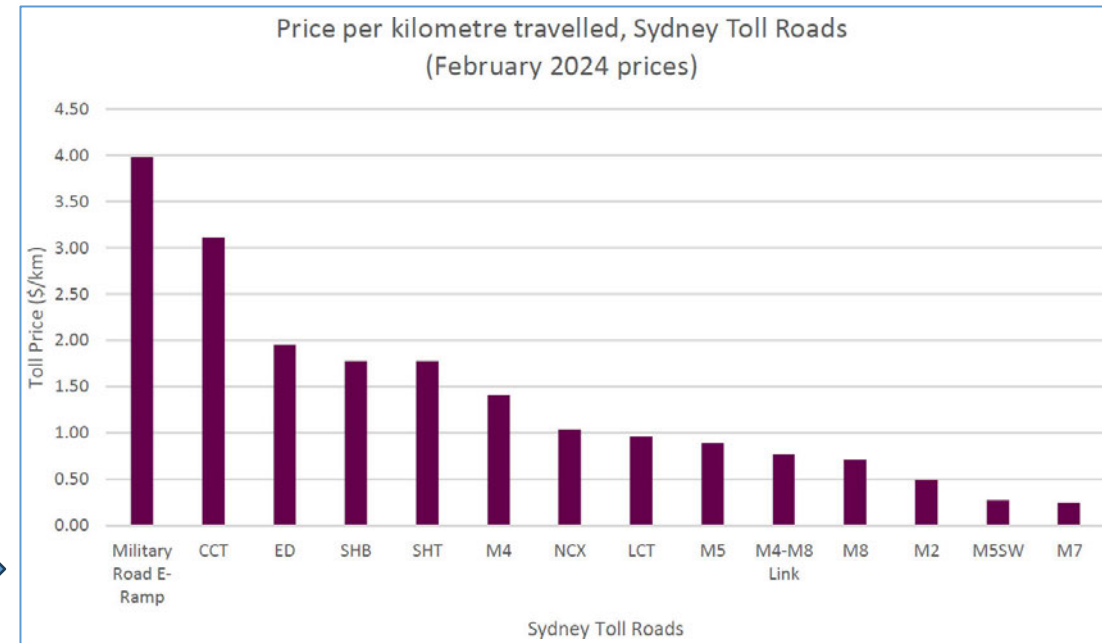


*Independent Toll Review, page 76*

- But time savings are **completely ignored** in the traditional, price-focussed metric (cost per mile)
  - More on this later.
  - For now, back to the Independent Toll Review →

# Independent Toll Review (page 61)

- “Different price regimes across the toll road network lead to different prices **for similar trips...**”
- “The differential pricing regime across the network also gives rise to issues of equity where motorists using different sections of the network pay vastly different sums **for similar functionality**”
- “This is illustrated in [the following chart] which shows the range of different per-kilometre prices across the Sydney Toll Road network”



But, in terms of consumer value (time savings) these are **not** ‘similar trips’ with ‘similar functionality’. The time savings on offer vary significantly\*.

\* Time savings vary significantly by road and, indeed, vary significantly along the same road eg. by time of day.

# In Response...

- Aside from consumers, planners and policymakers, there is another group of industry participants that is very interested in the value proposition being offered by toll roads
  - Our clients (international infrastructure investors)\*
- In summary, cost per mile is a 'producer metric' reflecting the supply-side attributes: facility length & toll tariff. It conveys nothing about utility or the consumer experience
- So, a number of years ago, we developed an alternative, 'consumer-focussed metric'

## **Cost per minute saved**

- ...and we've applied it extensively →

# Applying Our Cost per Minute Saved Metric

Experience to date



# Value Benchmarking: Applications to Date



- All toll bridges and tunnels in the **US**
  - Published in Infrastructure Investor magazine (September 2022) →
- All toll roads, bridges and tunnels in **Ireland**
  - Presented to IBTTA's Global Tolling Summit (Dublin, October 2022)
- All toll bridges and tunnels in **Europe**
  - Presented to the UK Government agency in charge of motorways in England - National Highways (March 2024)
- All toll roads, bridges and tunnels in **Sydney**
  - This submission to the Independent Toll Review (NSW, April 2024)

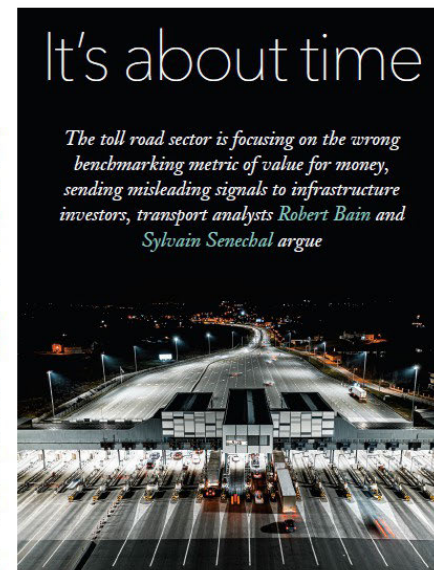
## Analysis

**B**enchmarks are used in infrastructure analysis as independent reference points when evaluating an investment strategy or a particular investment candidate. They can be financial – peer comparisons of EBITDA margins are commonplace – or focused on the sector-specific operational or performance aspects of assets. Over time, best practice emerges based on experience of the attributes and qualities that lead to positive investment outcomes (critical success factors).

In the toll road sector, benchmarks are used to shine a light on the attractiveness of a facility to consumers. In the context of traffic and revenue forecasting, they are commonly cited in support of the more ambitious predictions of demand. In short, they are used to signal value for money – and this has important and widespread implications:

- Policy-makers and the public are more likely to support toll roads that represent a strong value for money proposition;
- Rating agencies, debt providers and insurers regard good value for money as being credit-positive;
- Equity financiers regard good value for money as being investment-positive.

The industry-standard benchmark for value in the toll road sector is cost per mile. How much does travel cost and how does the unit cost of using a specific road, bridge or tunnel stack up against others? This is regularly presented in consultants' reports (see chart 1), accompanied by a reassuring write-up: "This rate per mile is consistent with many... toll facilities"; "The toll



rates are typical for this type of... facility"; "The passenger car per-mile toll rates... are still very reasonably priced compared to other toll facilities".

At first glance, the cost per mile metric appears to have some attractive qualities. Top of the list is data availability and ease of calculation. All that is needed is the length of the asset and the respective toll price – information generally in the public domain. However, computational convenience and usefulness are two separate matters. And computational convenience quickly falls away when you get into the details.

On multi-access facilities, different

users make different trips of different lengths. So, what distance should be used? And toll tariffs vary by vehicle class, time of day, payment method, trip length, discount eligibility and so forth – so what cost should be used? For this reason, simplifying assumptions are adopted by benchmarkers, the details of which often remain frustratingly opaque. These data standardisation challenges can be overcome. However, a critical issue remains. Cost per mile – essentially price – is being used as a proxy for value. As we demonstrate later, it is a fundamentally flawed metric in this regard.

# Focus on Sydney's Toll Roads



# What is the Research Question?

- If we switch the focus from price to value, what would the Independent Toll Review's benchmarking chart look like?



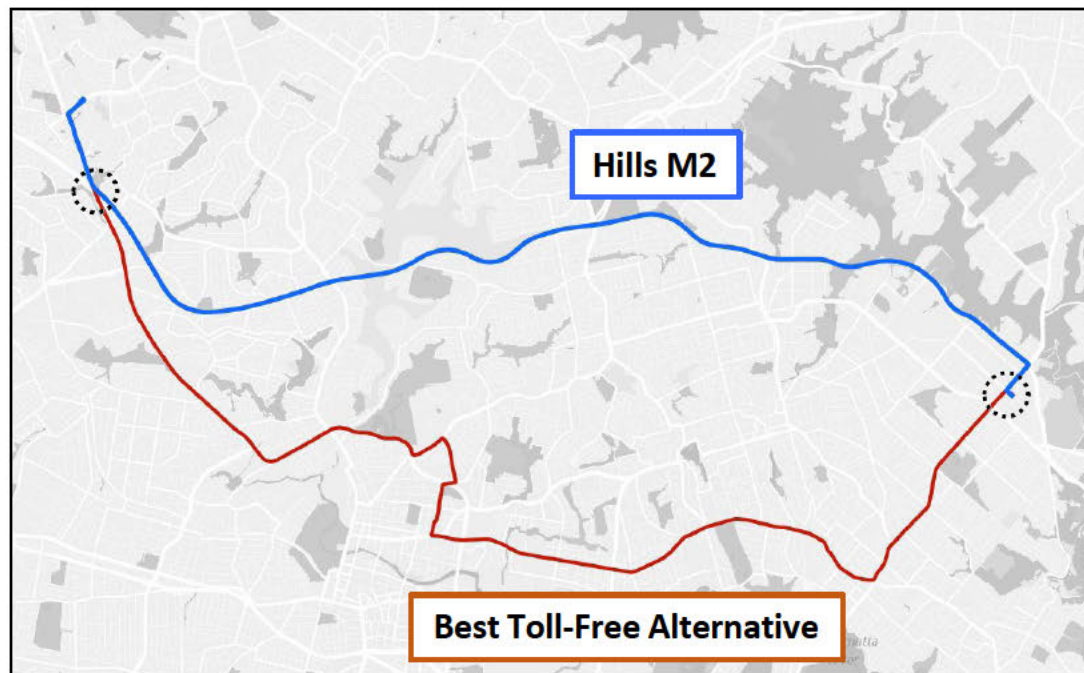
- Would the ranking change (if so, how and why)?


# How to Answer the Research Question

- Our 6-stage approach:
  - 1. Locate all of Sydney's toll facilities on a map and identify key route-choice decision points on the road network**
    - ...where drivers have the choice of using the toll facility or the best toll-free alternative
  - 2. Run the Google Maps' Directions API in 15-minute increments for a typical weekday**
    - Extract the travel times by direction for the competing routes (toll v toll-free)
    - From this, quantify the (toll v toll-free route) time savings
      - ...and measure how these time savings typically vary across a 24-hour period

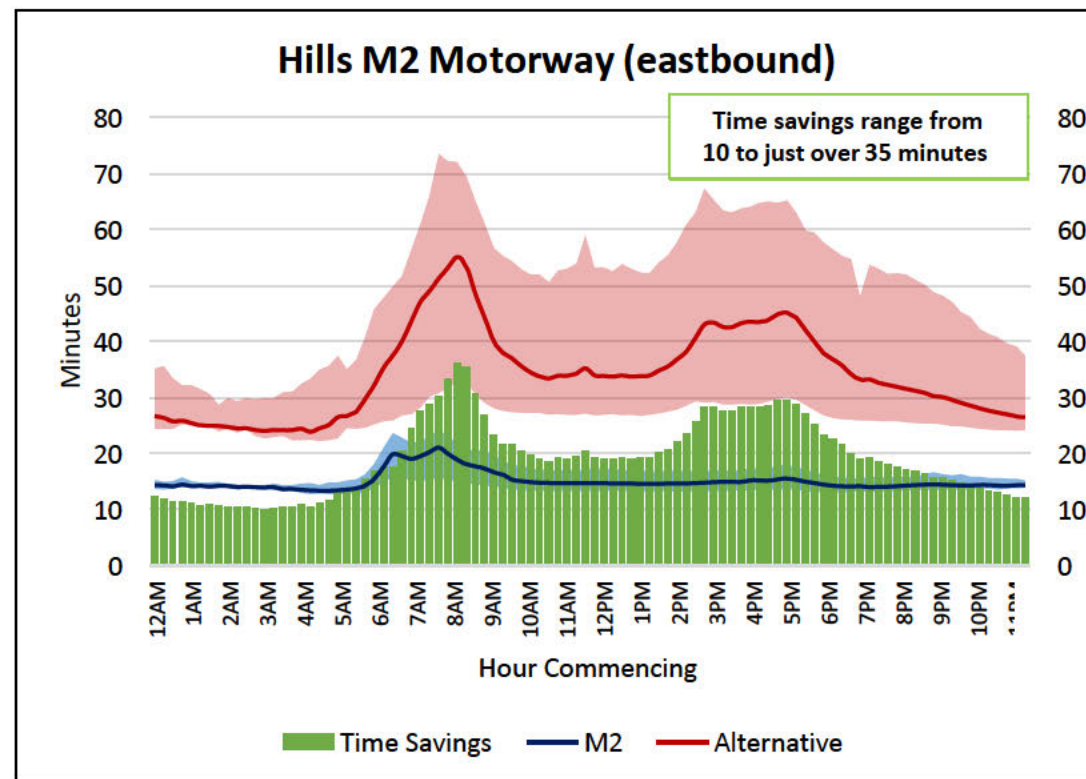
# Example 1: Hills M2 (M2)

## 1. Identify Key Route-Choice Decision Points



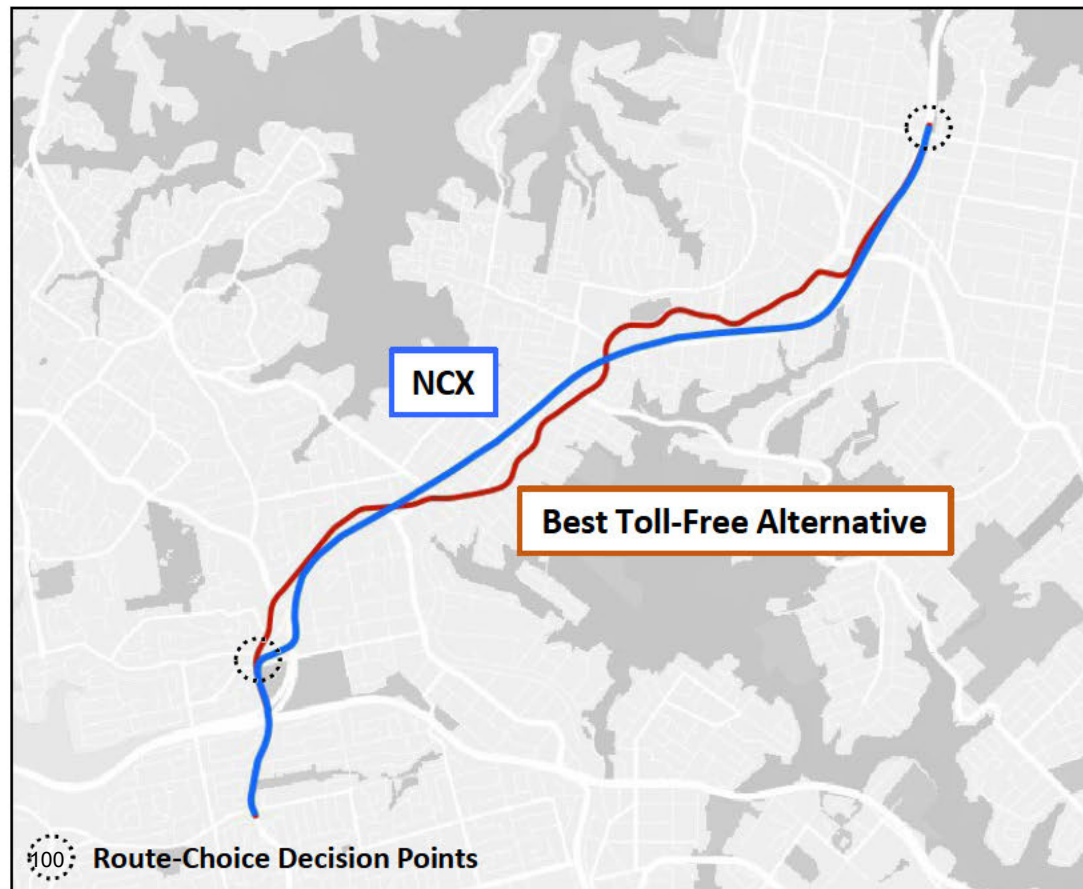
 Route-Choice Decision Points

## 2. Calculate Time Savings (every 15 minutes)

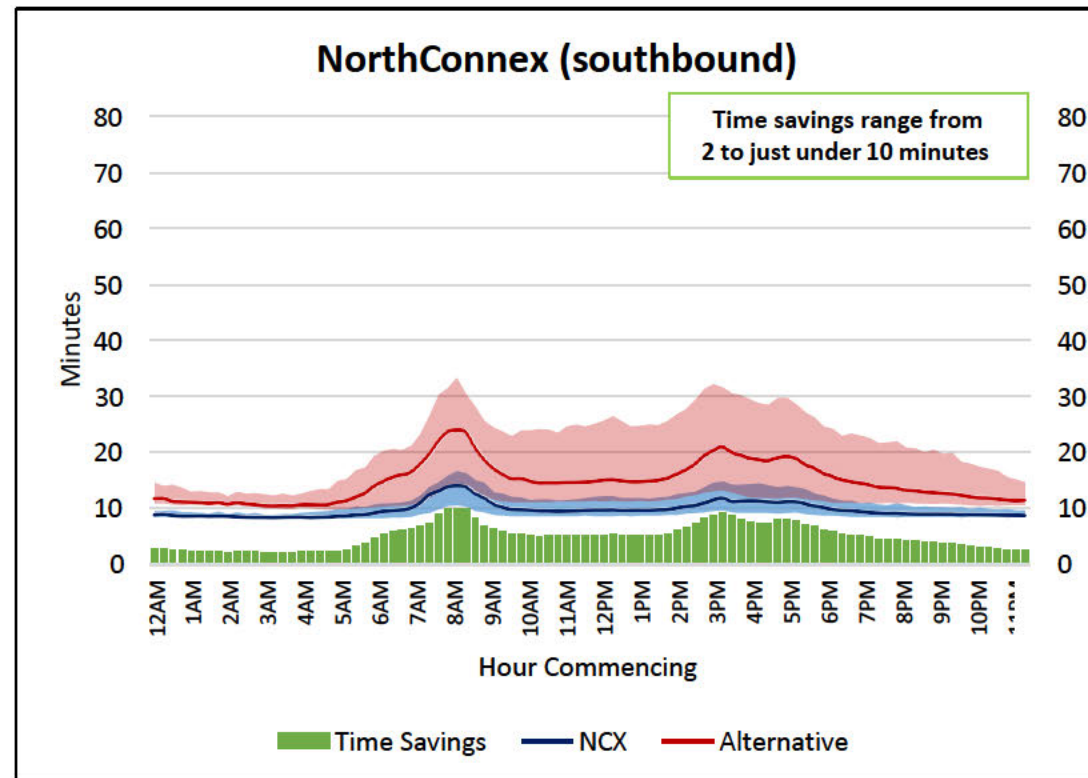


# Example 2: NorthConnex (NCX)

## 1. Identify Key Route-Choice Decision Points



## 2. Calculate Time Savings (every 15 minutes)



Shading Reflects Journey Time Variability

# How to Answer the Research Question

- Our 6-stage approach (*cont.*):
  - 3. From the range of computed travel time savings, calculate the median time saving**
    - This represents the typical value of time savings that users will experience
      - 50% of users experience higher savings and 50% experience lower savings
  - 4. Compile the toll tariffs for each of the facilities**

# How to Answer the Research Question

- Our 6-stage approach (*cont.*):
  - 5. Calculate the cost per (typical) minute saved for each facility**
    - ...and recompile the Independent Toll Review's benchmarking chart
  - 6. Check and test our findings against third-party data**
    - To independently validate our approach, enhancing confidence in our results

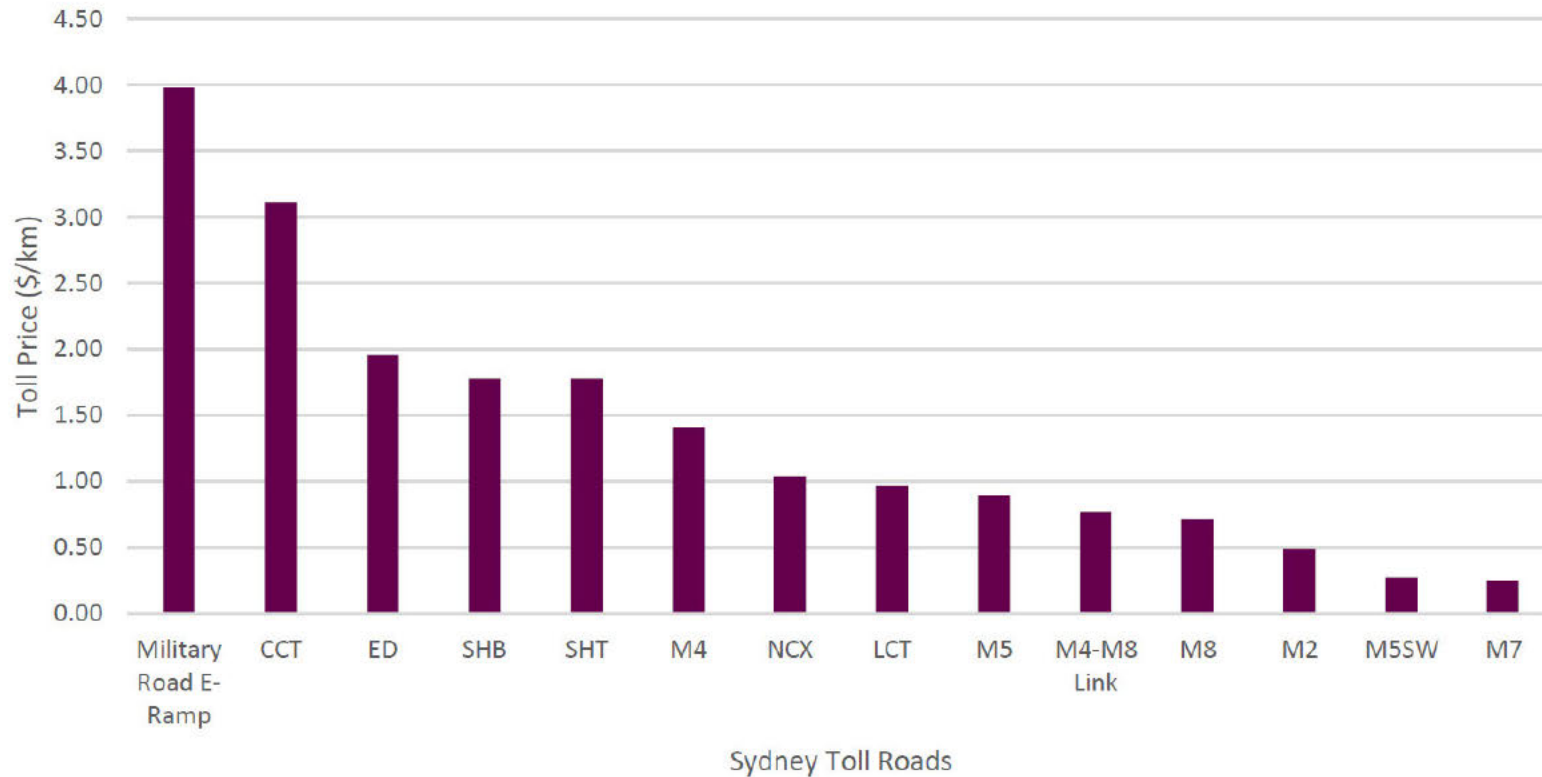
# Research Results

# Independent Toll Review (page 62)

These are the toll roads ranked by cents per mile

As presented in the Interim Report

Price per kilometre travelled, Sydney Toll Roads  
(February 2024 prices)



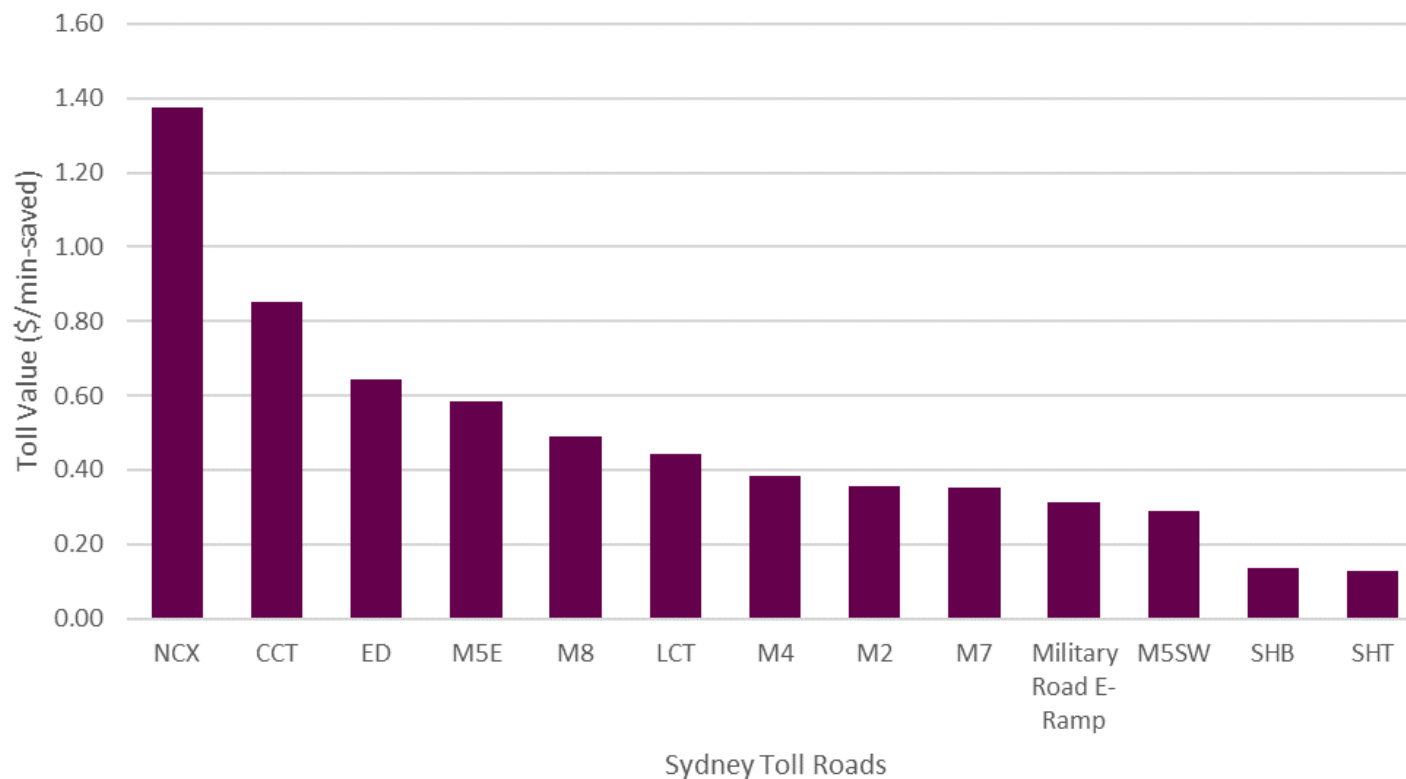
Cents per Mile	
Highest	Military Road E-Ramp
Lowest	M7



# RBconsult Research

These are the toll roads ranked by cents per minute saved

Price per minute-saved, Sydney Toll Roads  
(February 2024 prices)



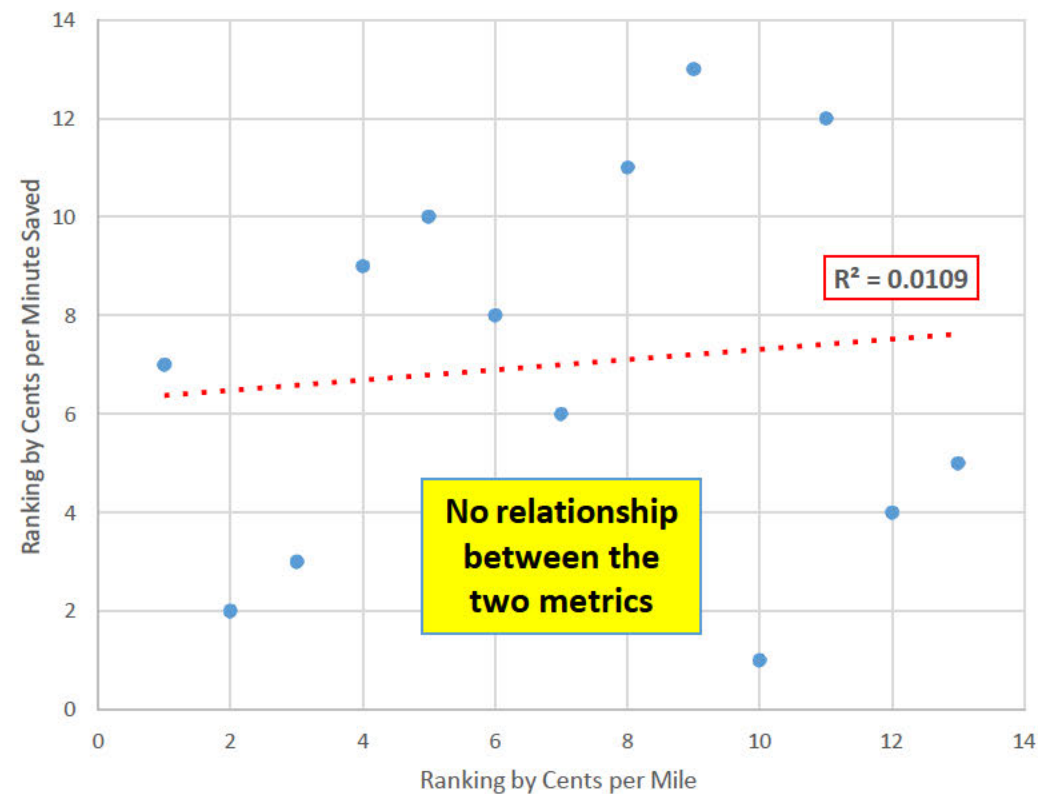
Cents per Minute Saved	
Highest	NCX
Lowest	SHT

When ranked by value (as opposed to price) the order completely changes

# Ranking by Price $\neq$ Ranking by Value

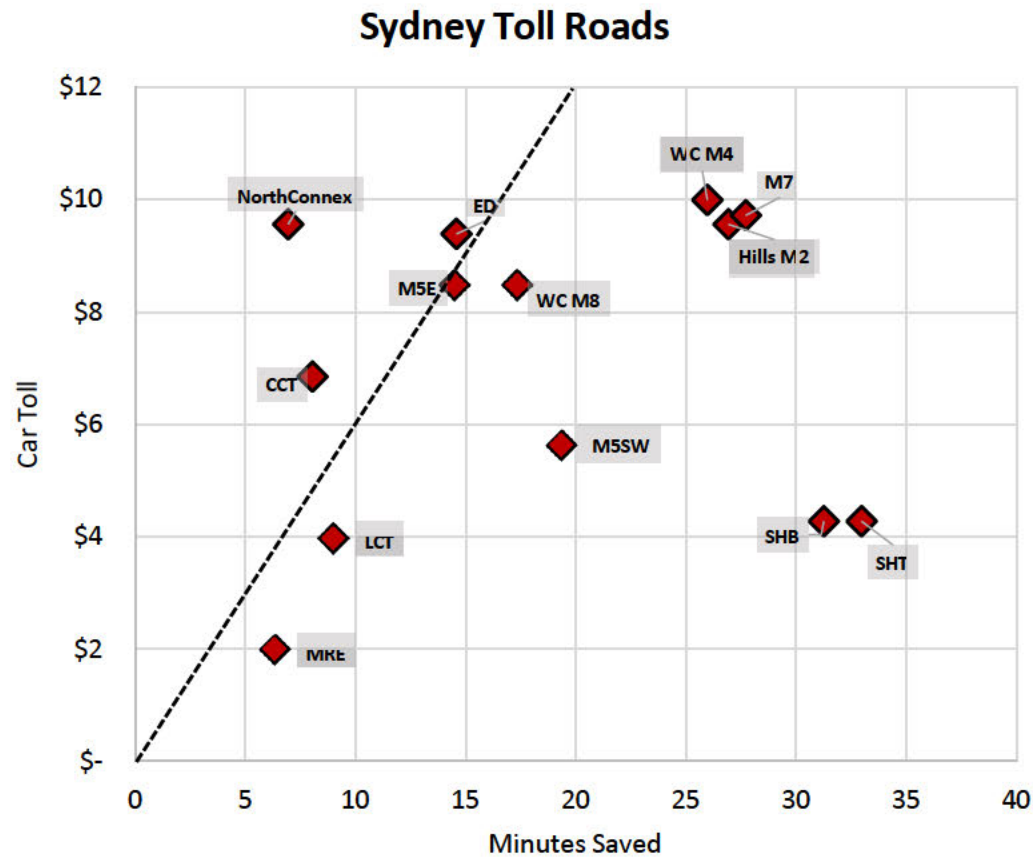
- For example:
  - **Military Road E-Ramps** rankings
    - 1 (**high**, by cents per km)
    - 10 (**low**, by cents per minute saved)
  - **Sydney Harbour Tunnel** rankings
    - 5 (**midrange**, by cents per km)
    - 13 (**lowest**, by cents per minute saved)
  - **NorthConnex** rankings
    - 7 (**midrange**, by cents per km)
    - 1 (**highest**, by cents per minute saved)

Testing for Correlation



- The Independent Toll Review Interim Report includes a benchmarking chart of all Sydney Toll roads ranked by price (cents per KM)
  - Switching to a value-based metric (cents per minute saved) changes the ranking significantly
    - The most expensive facility based on cents per KM (Military Road E-Ramps)  
...becomes the third least-expensive facility based on cents per minute saved
    - The most expensive facility based on cents per minute saved (NorthConnex)  
...is middle of the pack based on cents per KM
  - The following slide summarises the findings from our research →

# Research Summary



- The black dotted line represents drivers' value of time (\$36/hr)
  - Roads clustered around the line provide value (time savings) in-line with expectations
    - **MRE, LCT, M5E, ED & WC M8**
  - Roads to the right of the line represent particularly good value for money
    - **M5SW, WC M4, M7, Hills M2, SHB & SHT**
  - Roads to the left of the line represent relatively poor value for money
    - **CCT & NorthConnex**

# Conclusions

- Regulatory pricing reviews need to consider value to the consumer
- The standard metric (cents per mile) is deficient and misleading
- Benchmarking Sydney's toll roads by value (cents per minute saved):
  - ...demonstrates that the value propositions on offer by different facilities are currently very different
- Pricing reform should seek to realign systemwide toll tariffs on a value (not price) basis
  - ...establishing (and underscoring) that **consumers** are the primary focus for any regulatory intervention.



We would be happy to discuss the contents of this presentation further with members of the Independent Toll Review if/as appropriate.

We consent to our submission being published.

Corresponding author: Robert Bain ([info@robbain.com](mailto:info@robbain.com))

# Appendix A

Independent validation of our approach

# Independent Validation

- Our method for calculating value (cents per minute saved) relies upon an accurate measurement of the time savings on offer
  - Toll route versus the best toll-free alternative
- Does independent data on these time savings exist?
  - Yes - Transurban publishes their own time saving estimates on their website



<https://insights.transurban.com/travel/>

Transurban Insights hub Safety Travel Sustainability Future Reports

Sydney road users save time travelling on our roads during both the first (AM) and second (PM) half of the day

Highest travel-time saving (in minutes) on Transurban roads in Sydney (Jul 2022 - Jun 2023)

Search in table

ROAD	DIRECTION	AM	PM
Cross City Tunnel	Eastbound	8min	11min
Cross City Tunnel	Westbound	9min	12min
M1 Eastern Distributor	Northbound	18min	21min
M1 Eastern Distributor	Southbound	23min	22min
Lane Cove Tunnel	Eastbound	9min	8min
Lane Cove Tunnel	Westbound	6min	7min
Hills M2	Eastbound	35min	33min
Hills M2	Westbound	37min	41min
M5 South West	Eastbound	24min	28min
M5 South West	Westbound	26min	22min
M5 East	Eastbound	18min	14min
M5 East	Westbound	16min	21min
Westlink M7	Northbound	34min	37min
Westlink M7	Southbound	39min	34min
WestConnex M8	Eastbound	21min	18min
WestConnex M8	Westbound	25min	28min
NorthConnex	Northbound	9min	8min
NorthConnex	Southbound	10min	10min
WestConnex M4	Eastbound	28min	31min
WestConnex M4	Westbound	28min	41min

Travel-time savings are for the entire length of each road, compared to the alternative route; 'AM' means midnight to noon and 'PM' means noon to midnight

Table: Transurban • Source: TomTom • Get the data • Embed • Download image

**"Highest travel-time savings"**

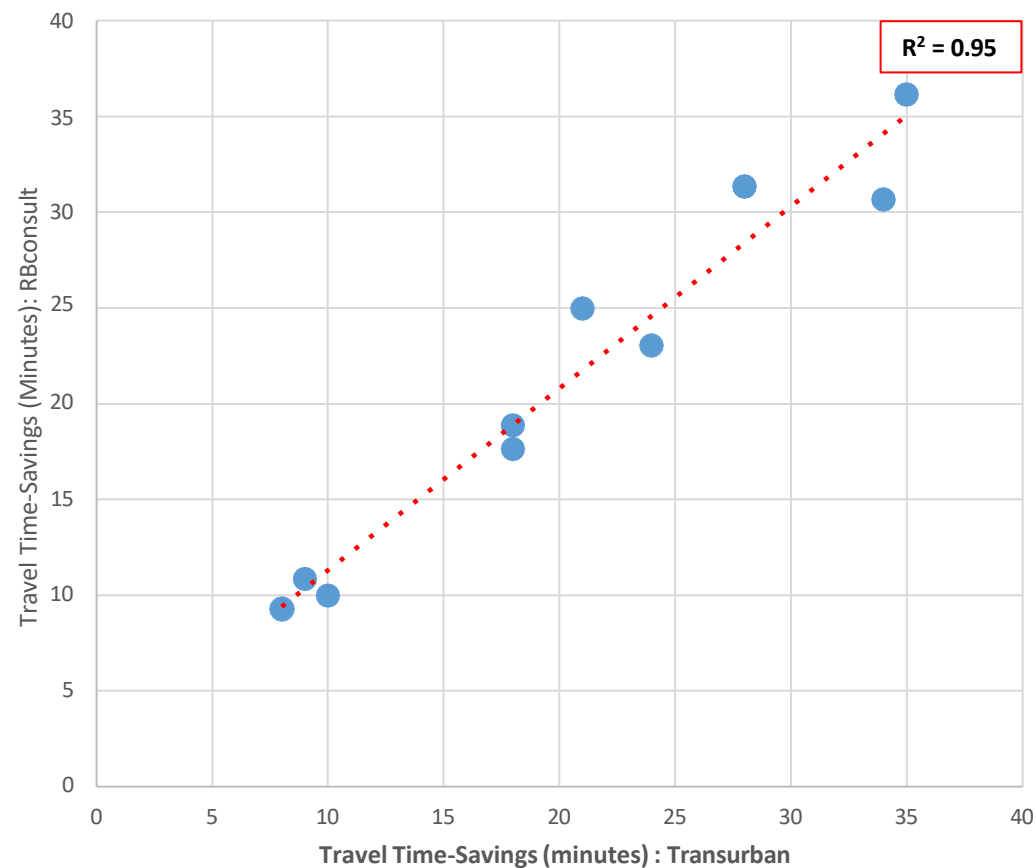
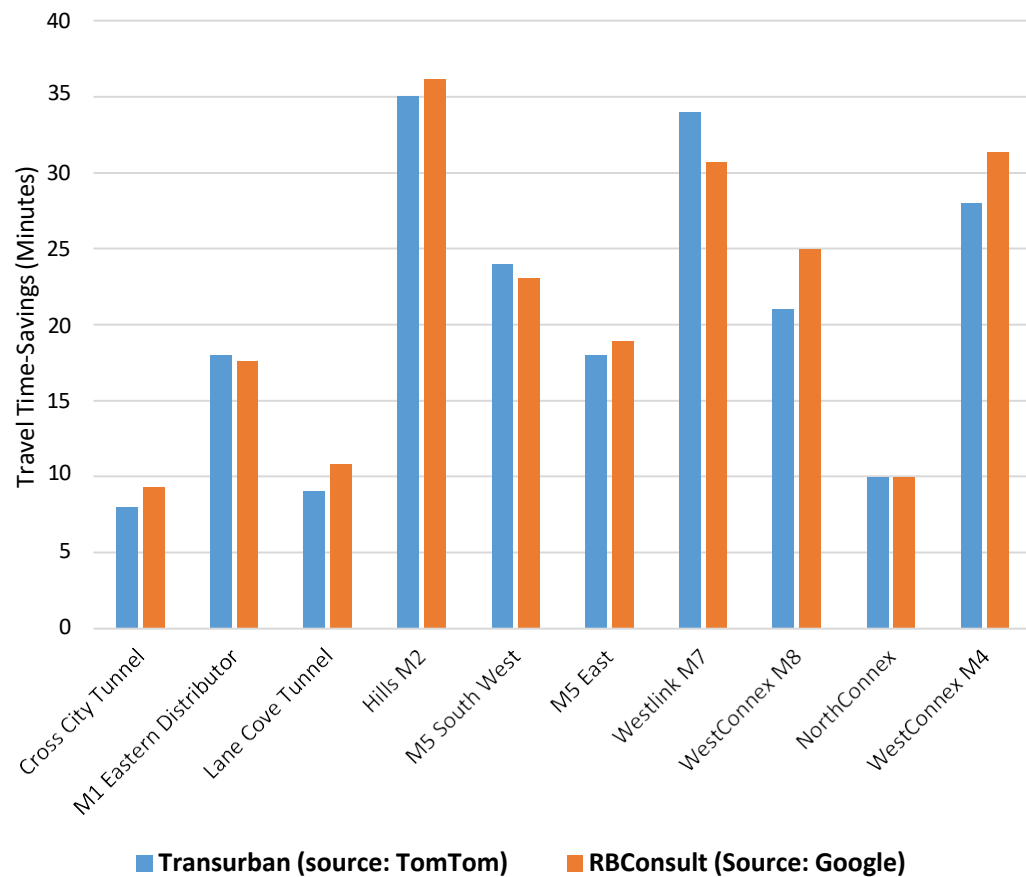
**Source = TomTom (an alternative provider of geolocation data)**

# Independent Validation

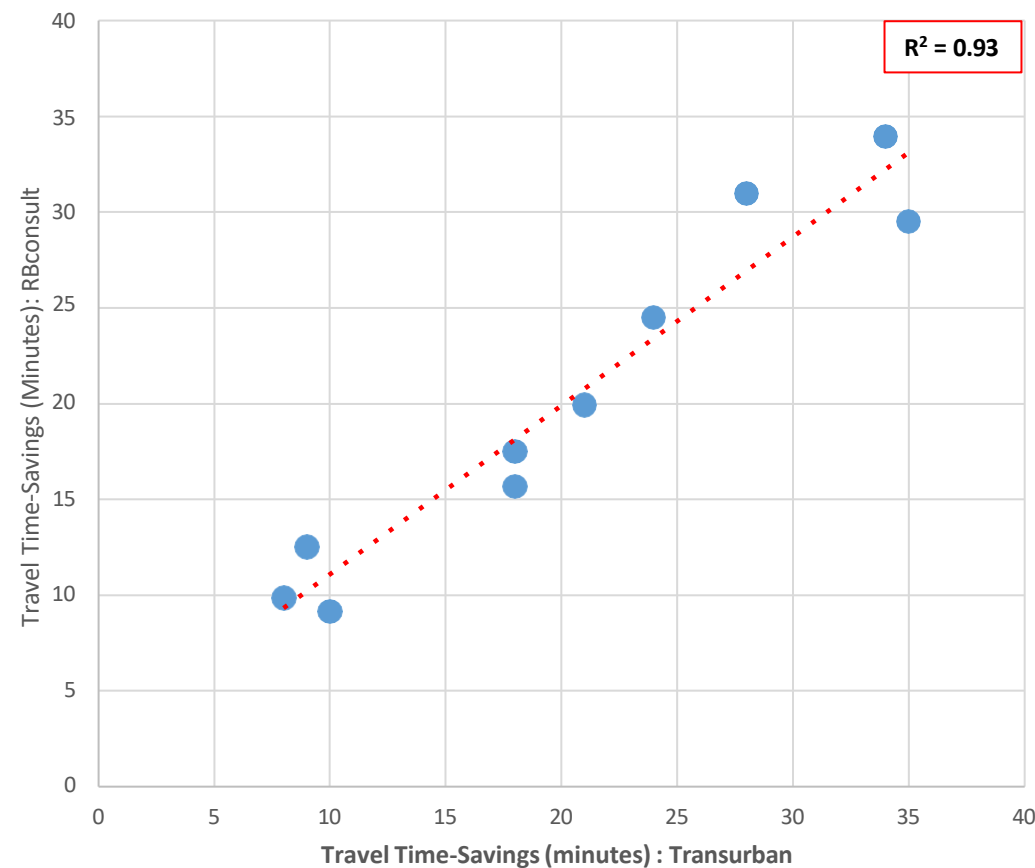
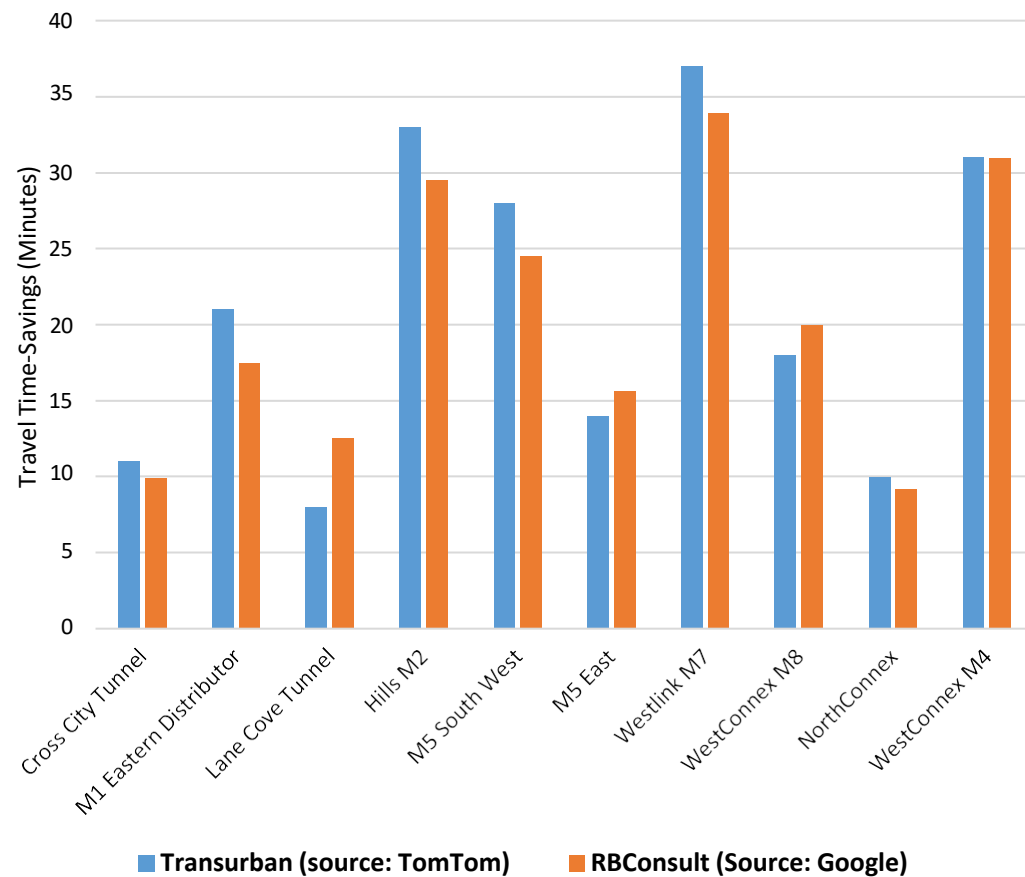
- Comparative analysis
  - There is a very high correlation between
    - Transurban's time-saving estimates (provided by TomTom)
    - And our time-saving estimates (calculated separately, using Google Maps)
  - This correlation is demonstrated in the following slides →
- Conclusion
  - Our time-saving estimates are near-identical to those published separately by Transurban
  - This provides independent validation of our approach and results

Unlike Transurban (which only shows "*the highest time-savings*"), our approach demonstrates how time savings - and hence, value - varies by time-of-day.

# Transurban v RBconsult: AM Peak Time Savings



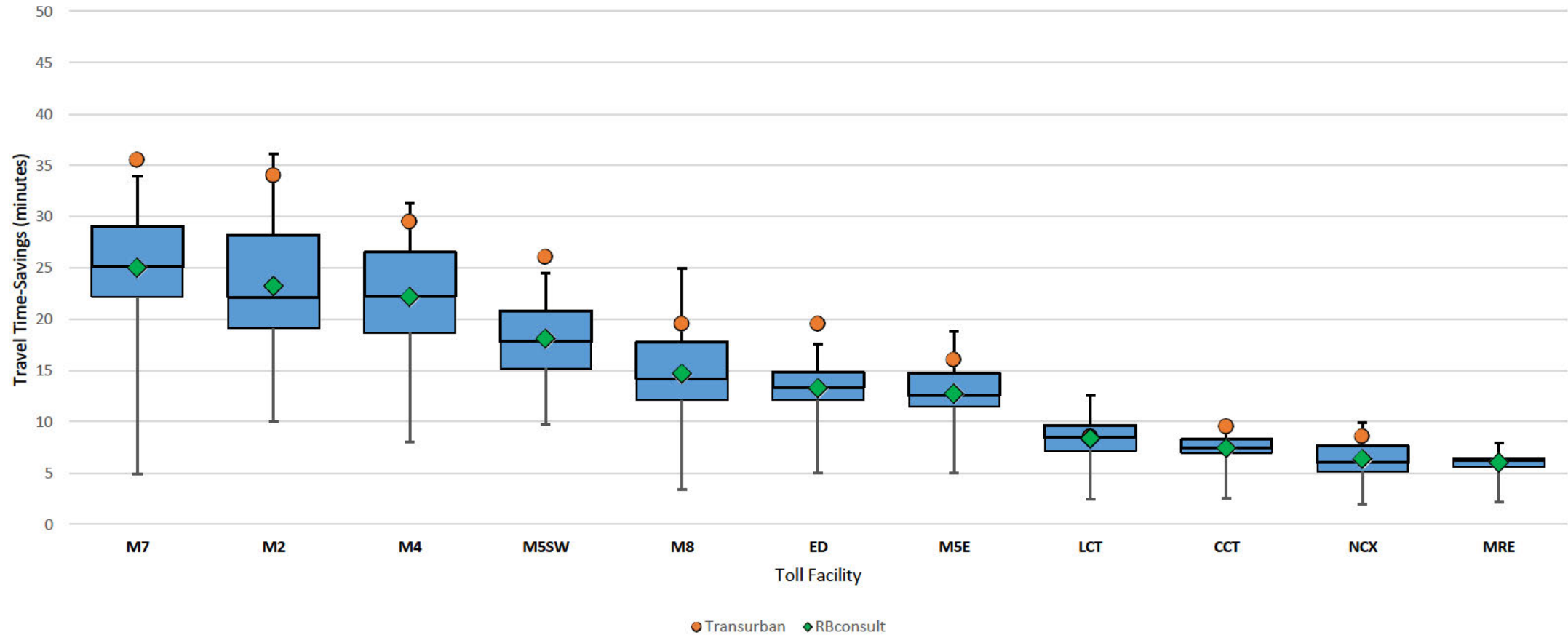
# Transurban v RBconsult: PM Peak Time Savings



# Guide to the Following Slide

- The following slide summarises the distribution of daily time savings by road
  - For this, we use a 'box and whiskers' plot - a simple way of representing statistical data
    - The blue box represents the second and third quartiles
    - The horizontal line (in the blue box) is the median value
    - The black lines indicate the full range of time savings
  - The median values we computed for our analysis (discussed earlier) are shown as a green diamond
  - The 'highest time savings' calculated separately for Transurban are shown as an orange circle
- As can be seen, the time savings on offer vary considerably (across a large range)
  - This is used in some tolling operations to vary the price accordingly
  - ie. reflecting the fact that the value to drivers varies by time of day, toll price is varied by time of day

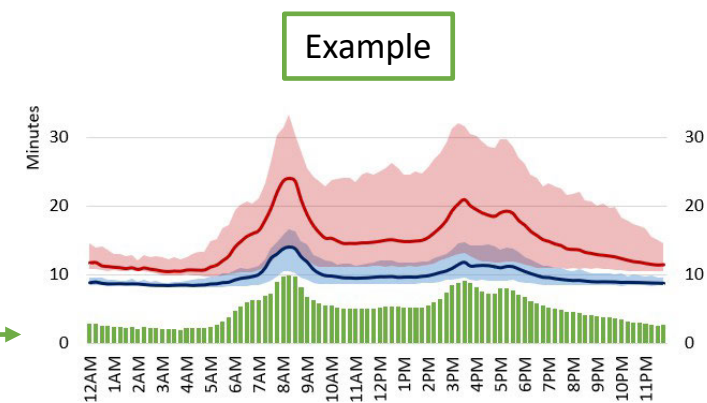
# Distribution of Daily Time Savings (by Road)



# Time Savings by Time-of-Day

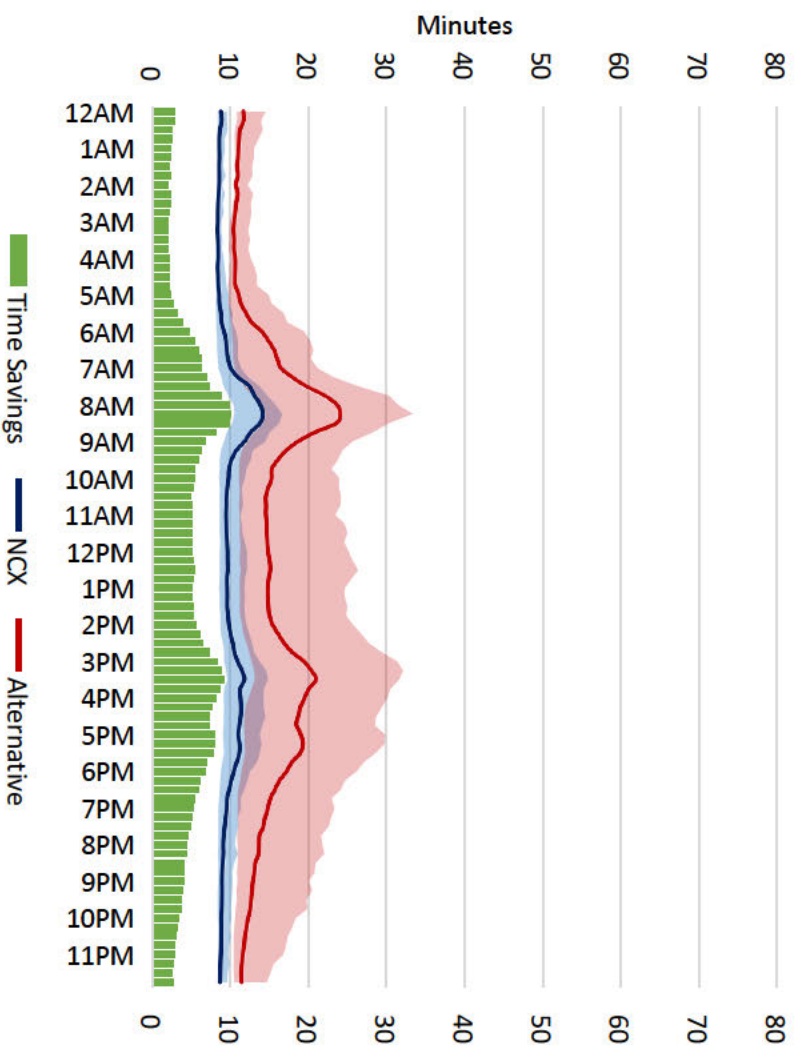
For all of Sydney's toll roads

Time savings shown as green bars (in 15-minute intervals)

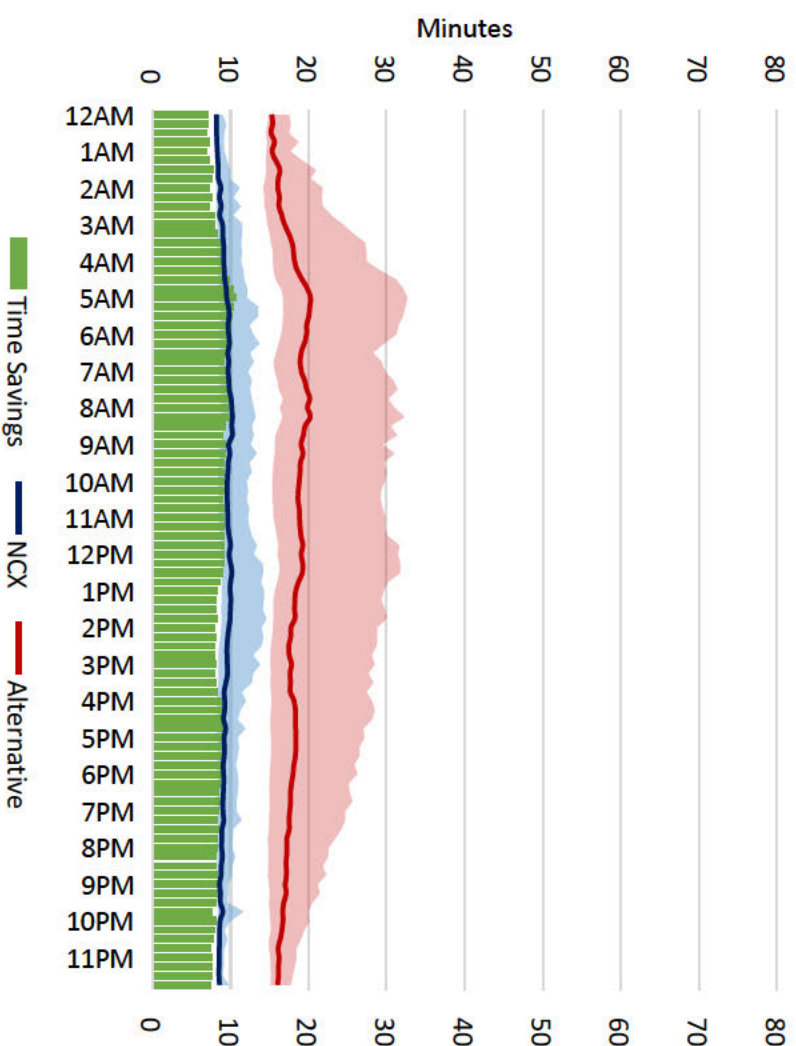


# NorthConnex

NorthConnex: South



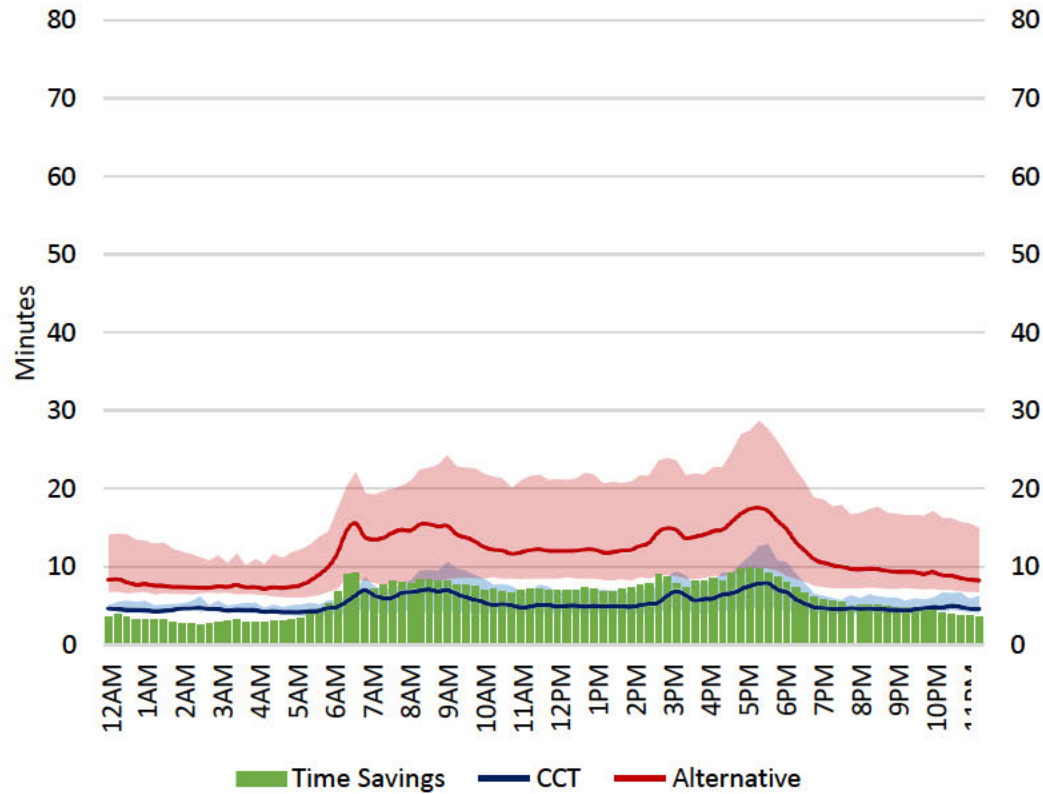
NorthConnex: North



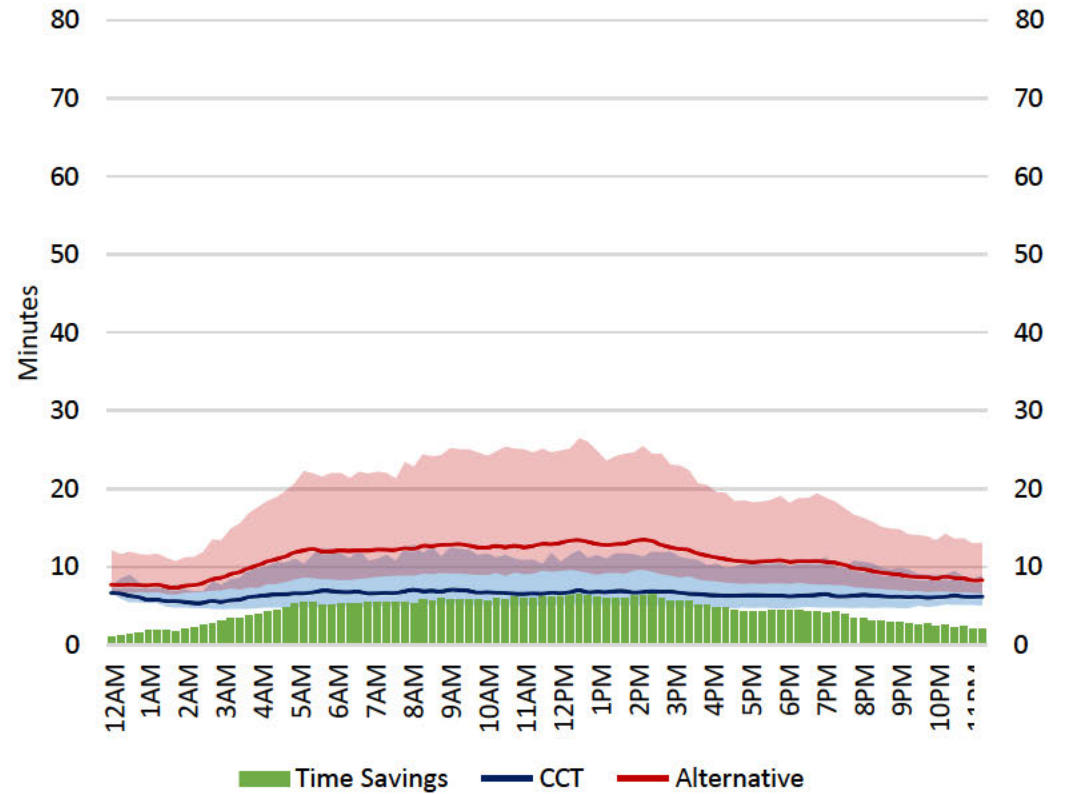


# Cross City Tunnel

**Cross City Tunnel: East**

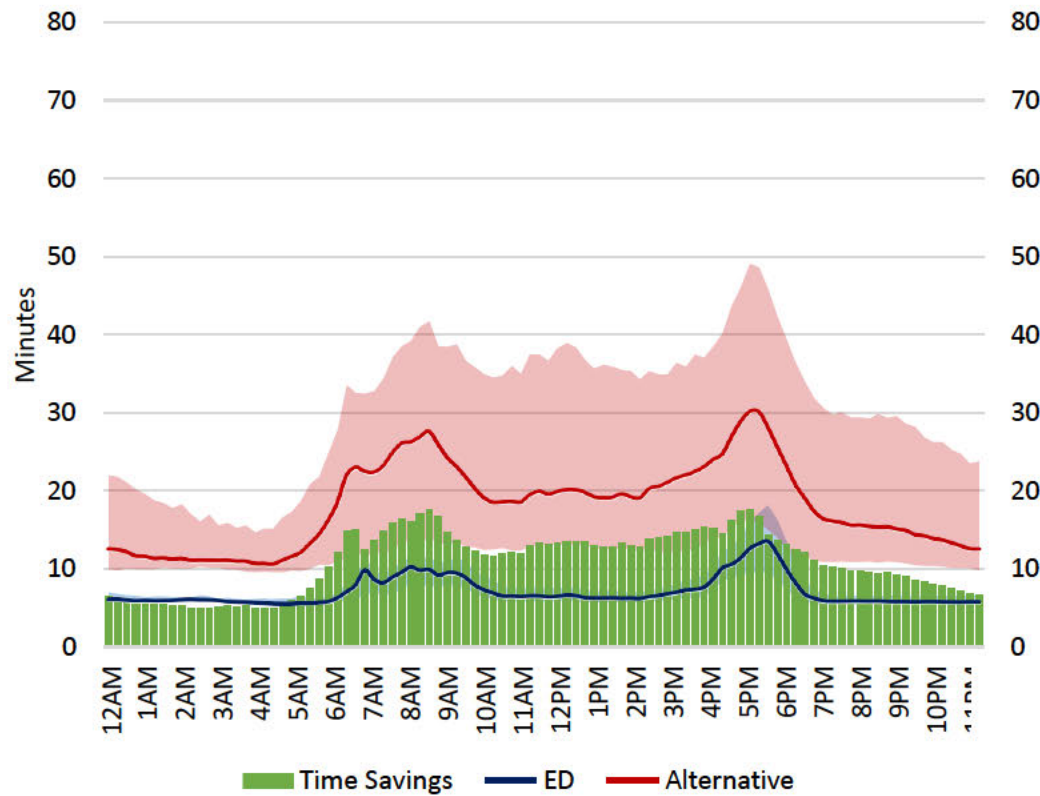


**Cross City Tunnel: West**

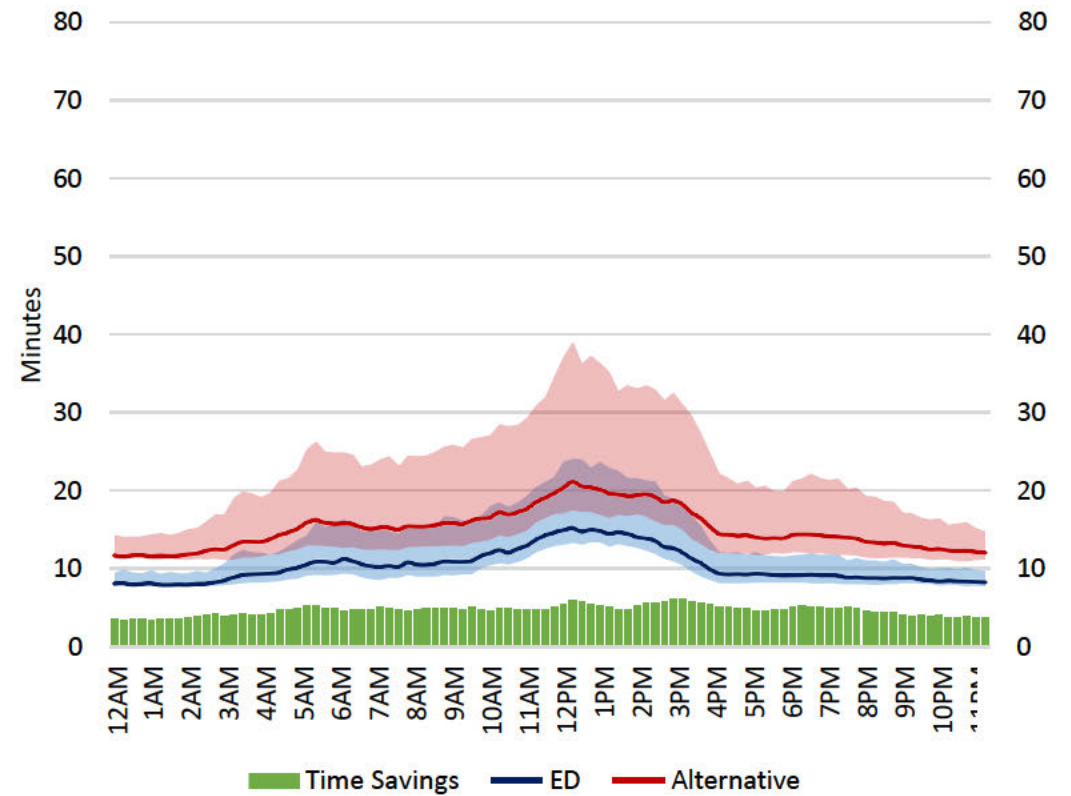


# Eastern Distributor

**Eastern Distributor: North**

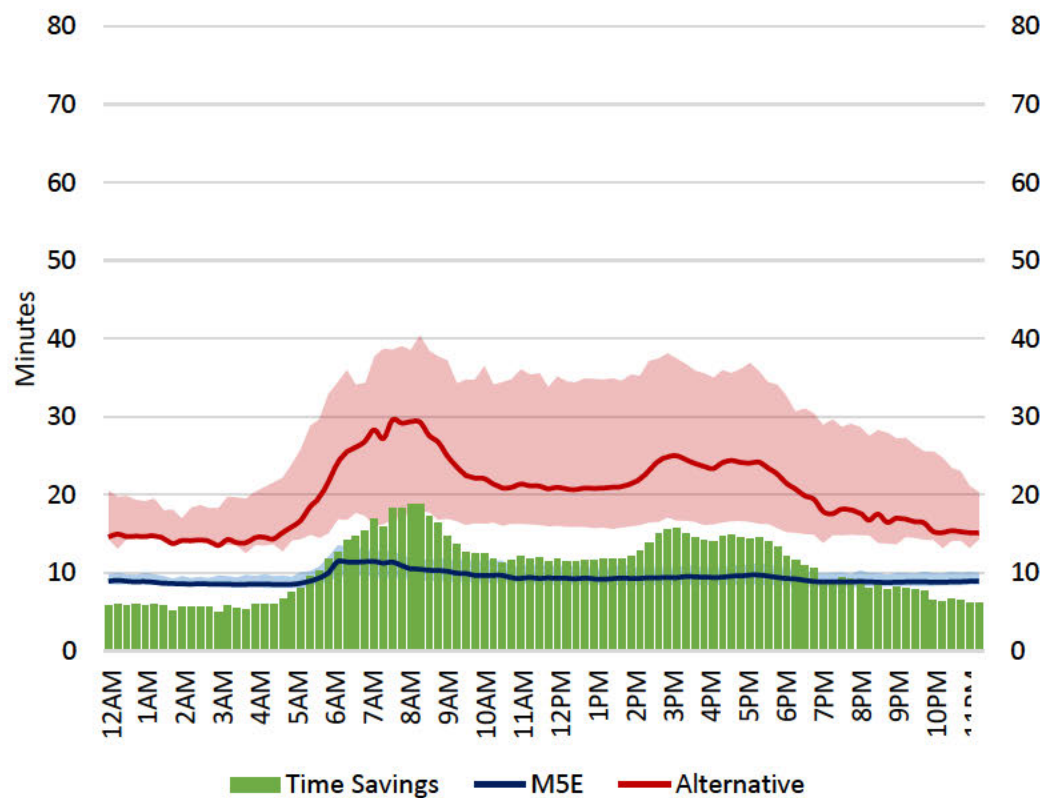


**Eastern Distributor: South**

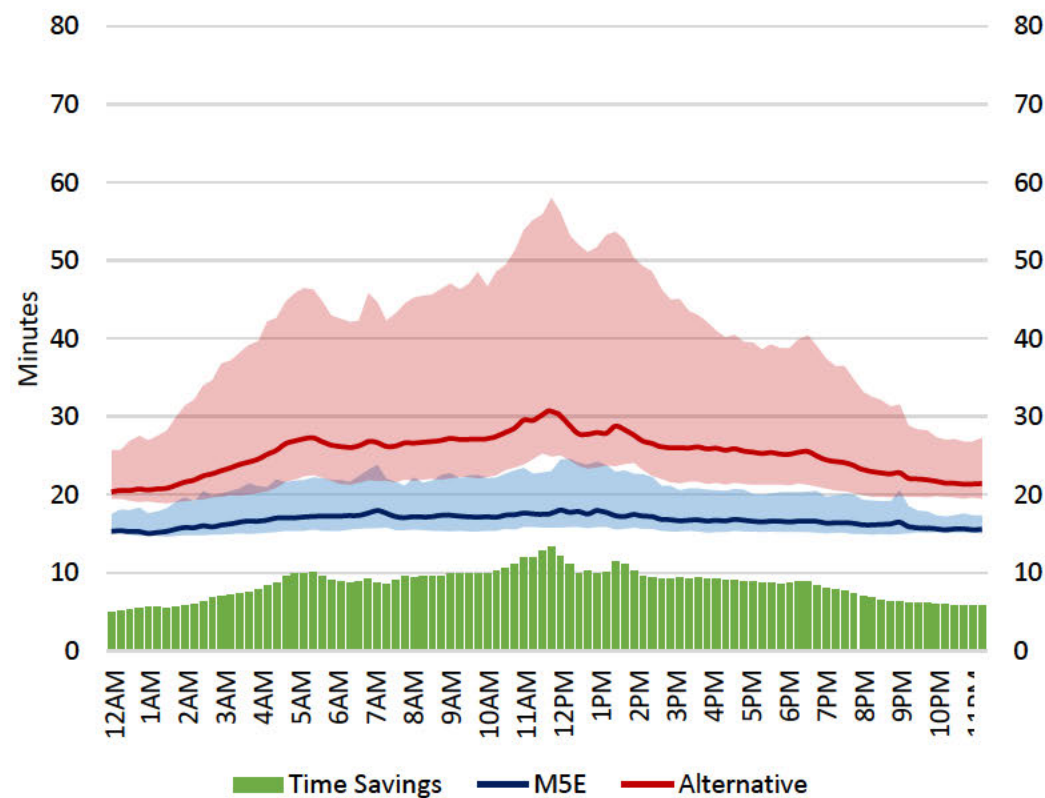


# WestConnex (M5 East)

**WestConnex M5 East Motorway: East**

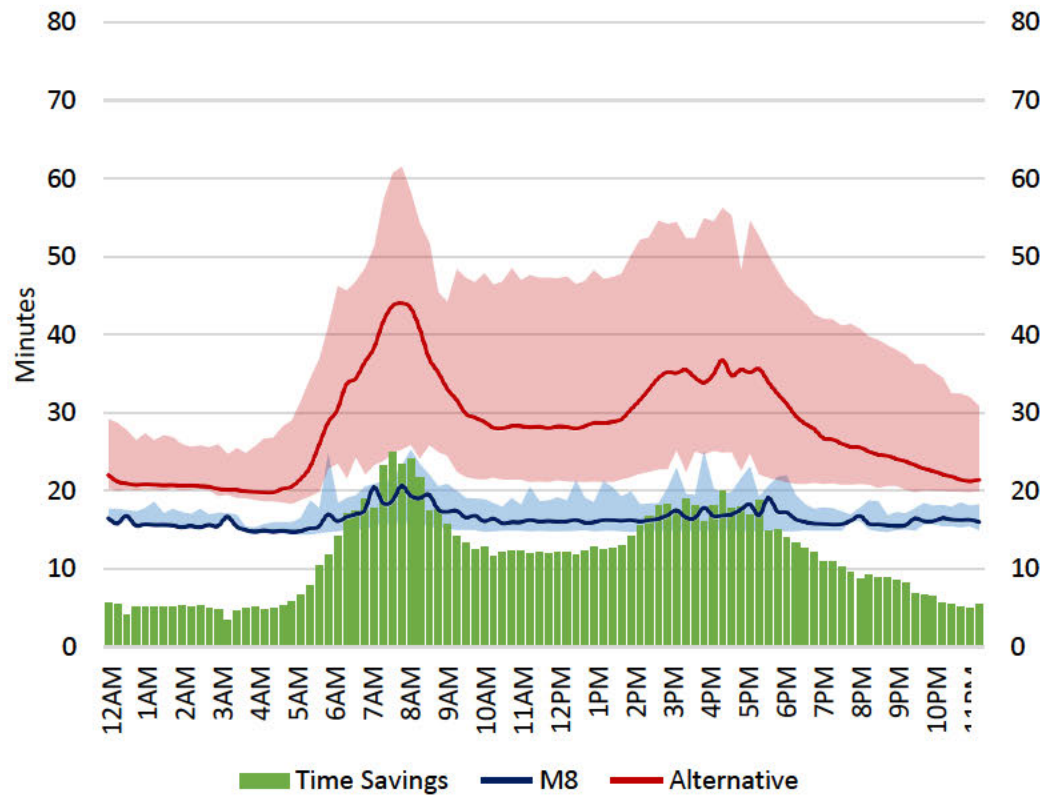


**WestConnex M5 East Motorway: West**

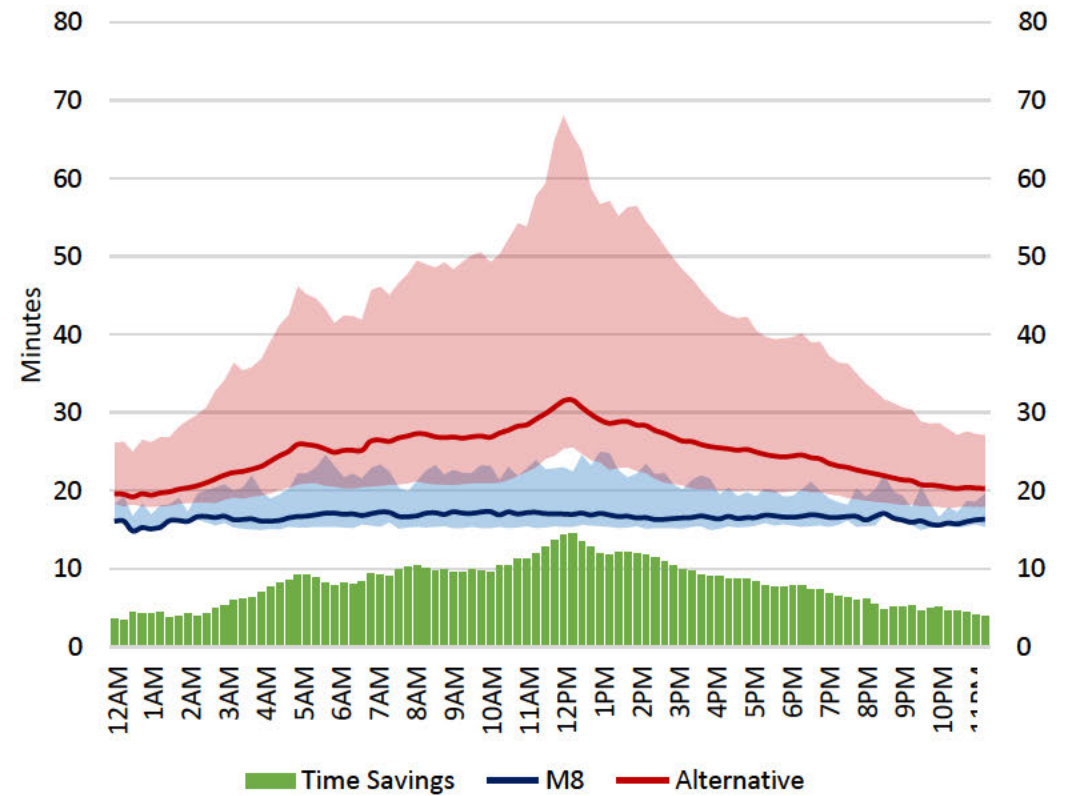


# WestConnex (M8)

**WestConnex M8 Motorway: East**

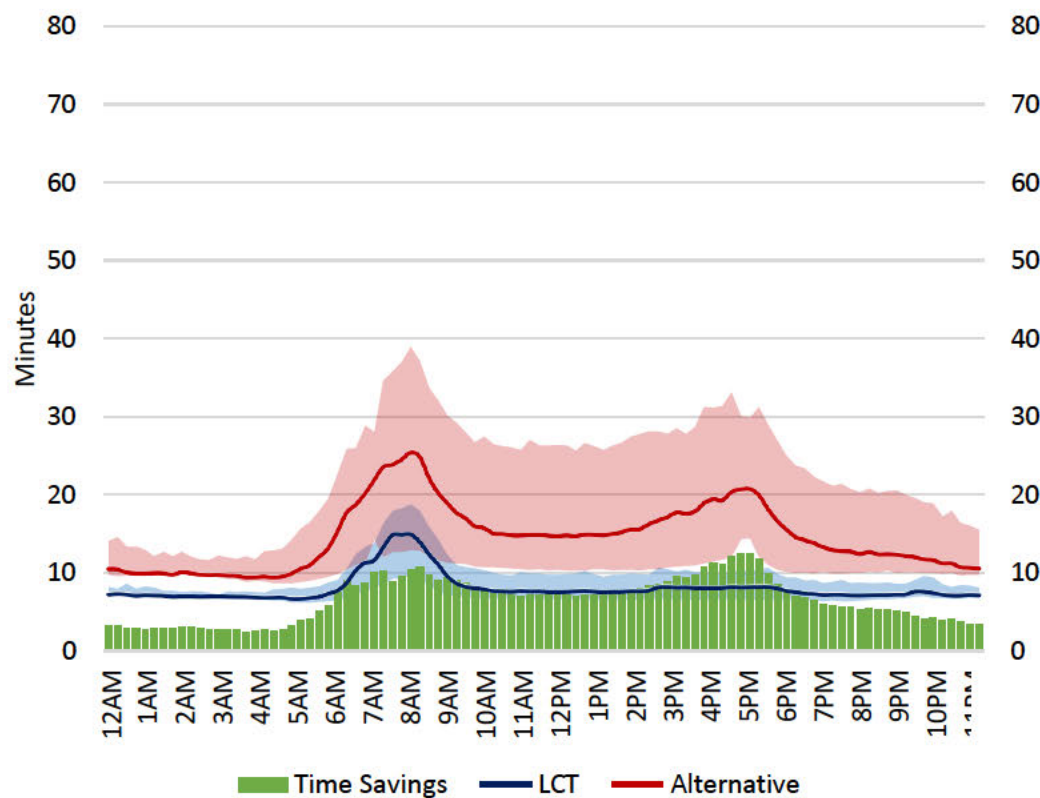


**WestConnex M8 Motorway: West**

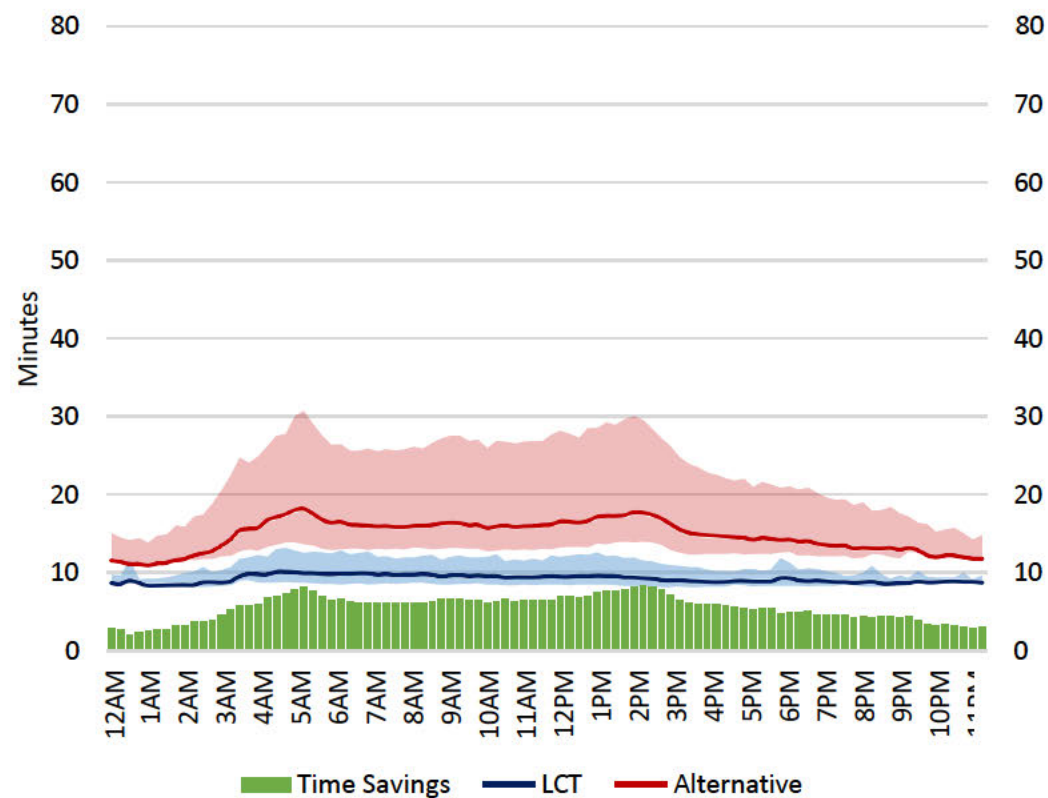


# Lane Cove Tunnel

**Lane Cove Tunnel: East**

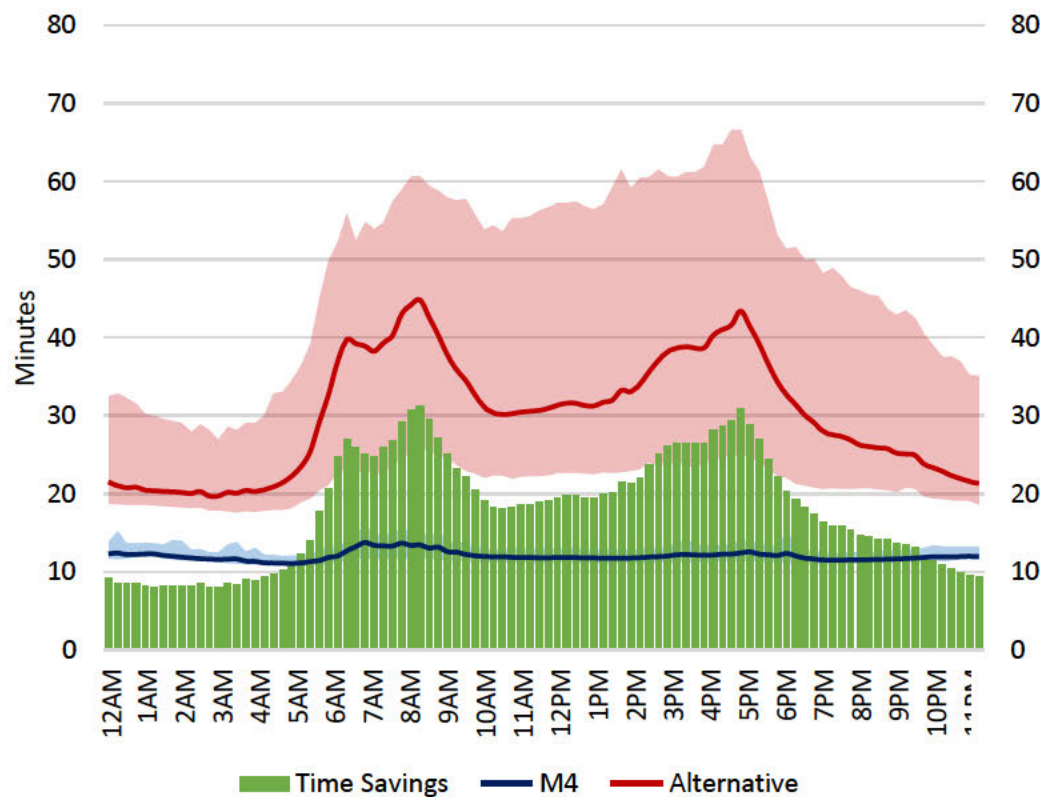


**Lane Cove Tunnel: West**

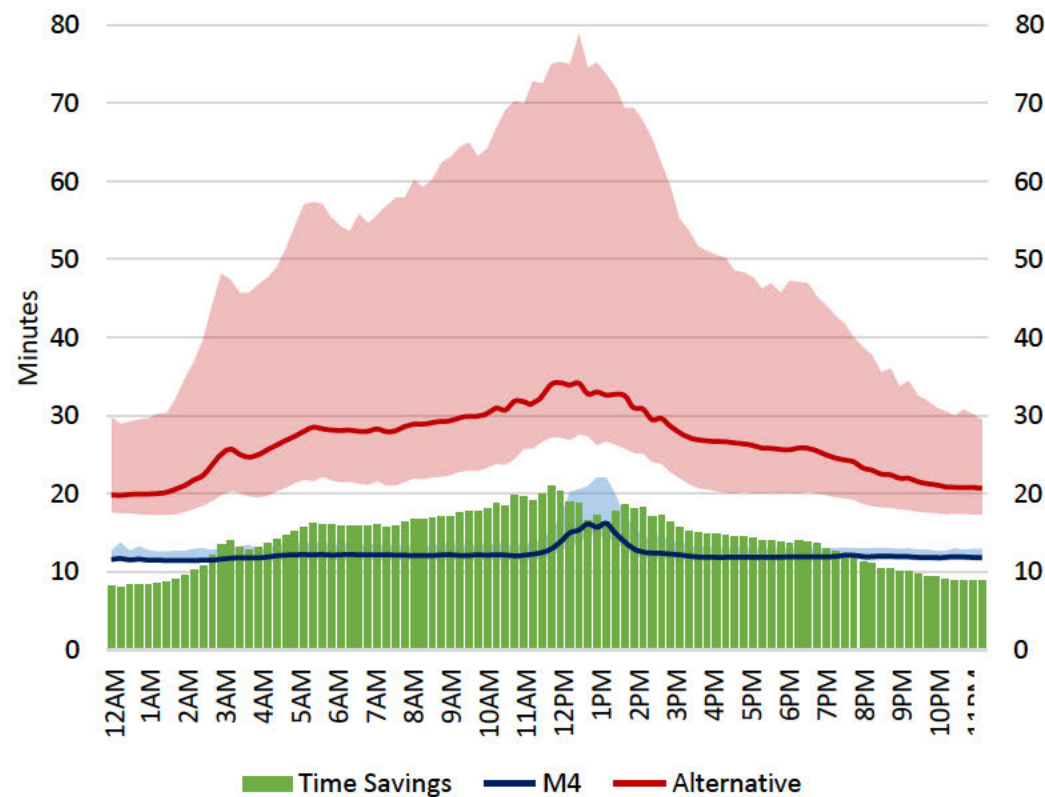


# WestConnex (M4)

## WestConnex M4 Motorway: East

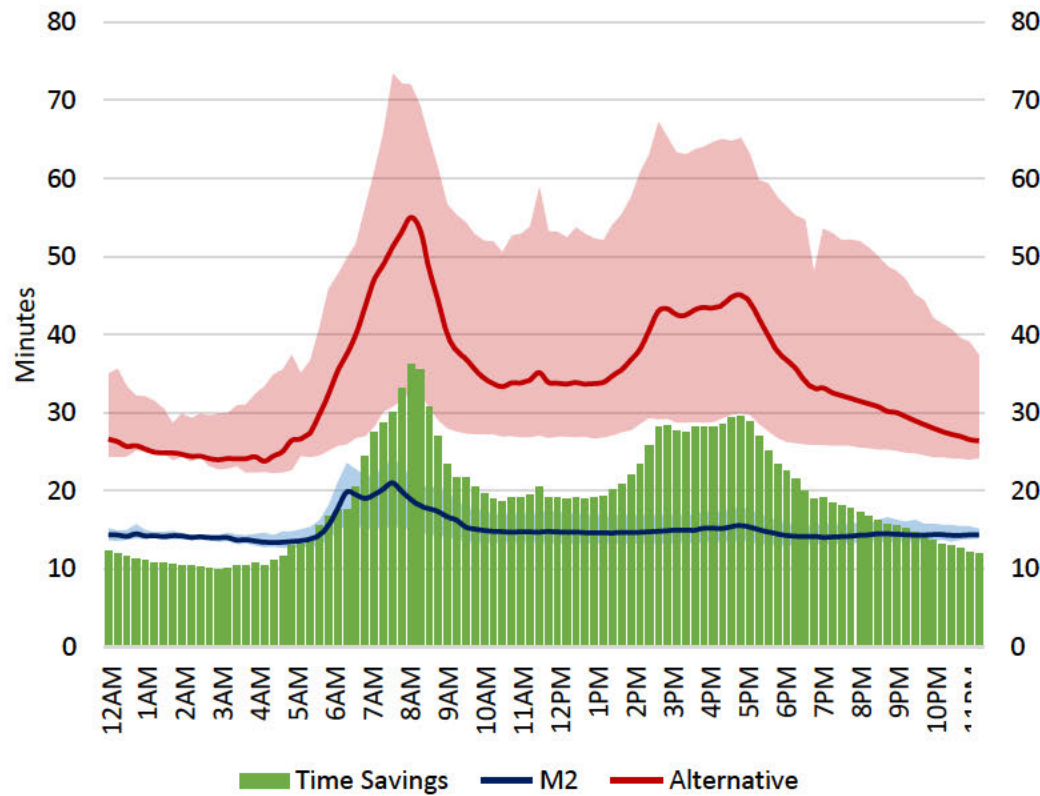


## WestConnex M4 Motorway: West

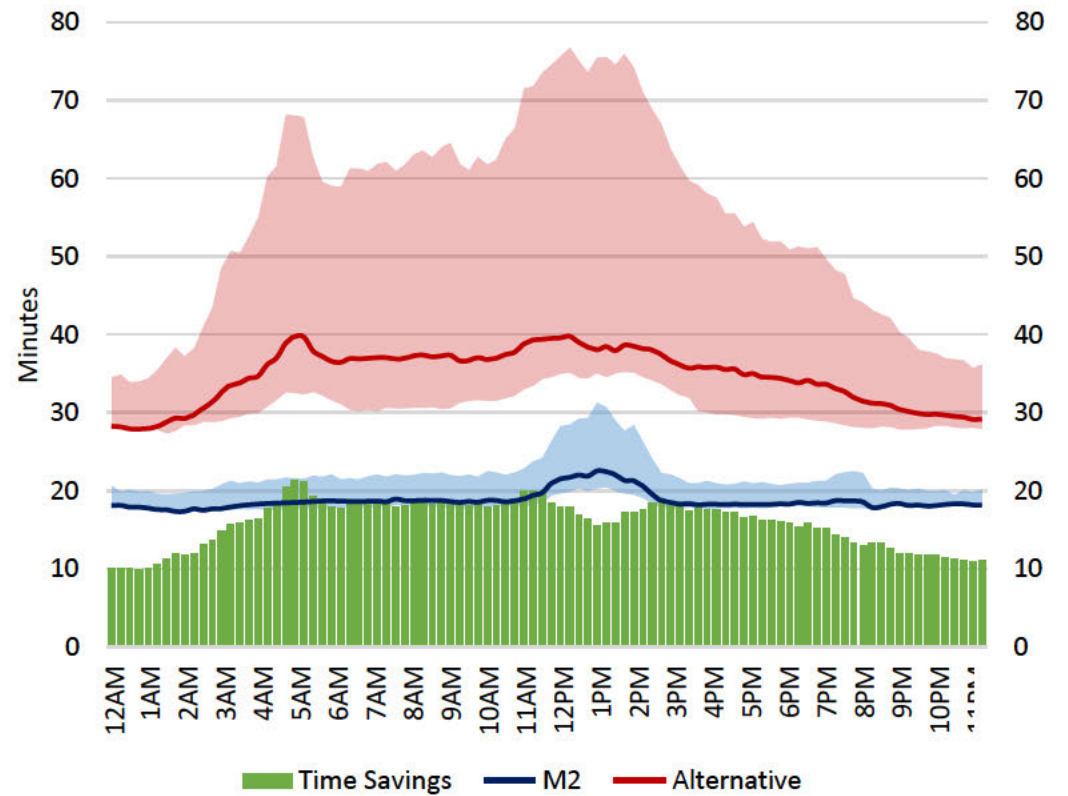


# Hills M2 Motorway

## Hills M2 Motorway: East

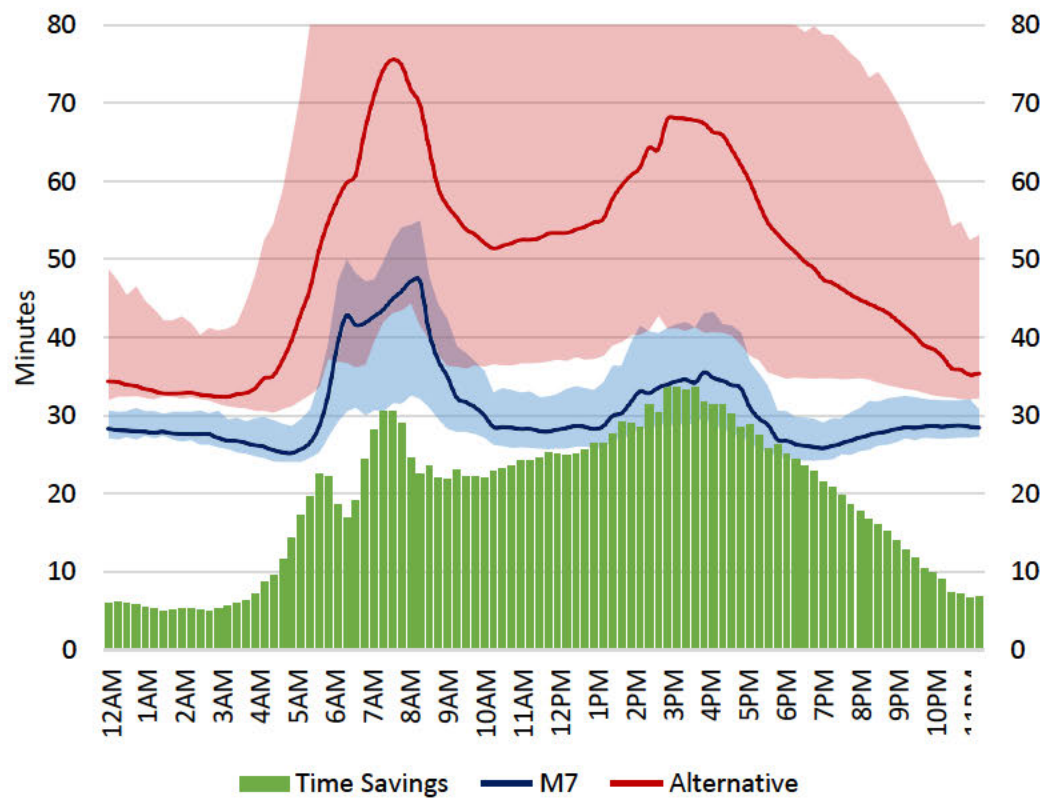


## Hills M2 Motorway: West

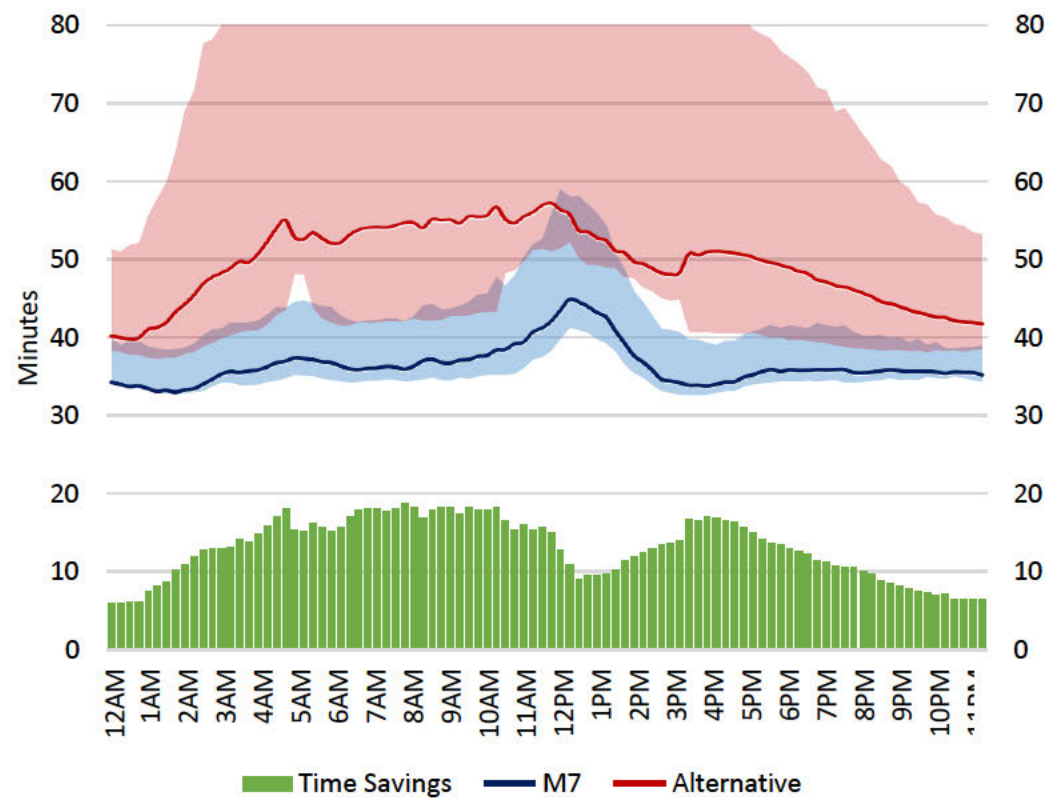


# Westlink M7

## Westlink M7 Motorway: North



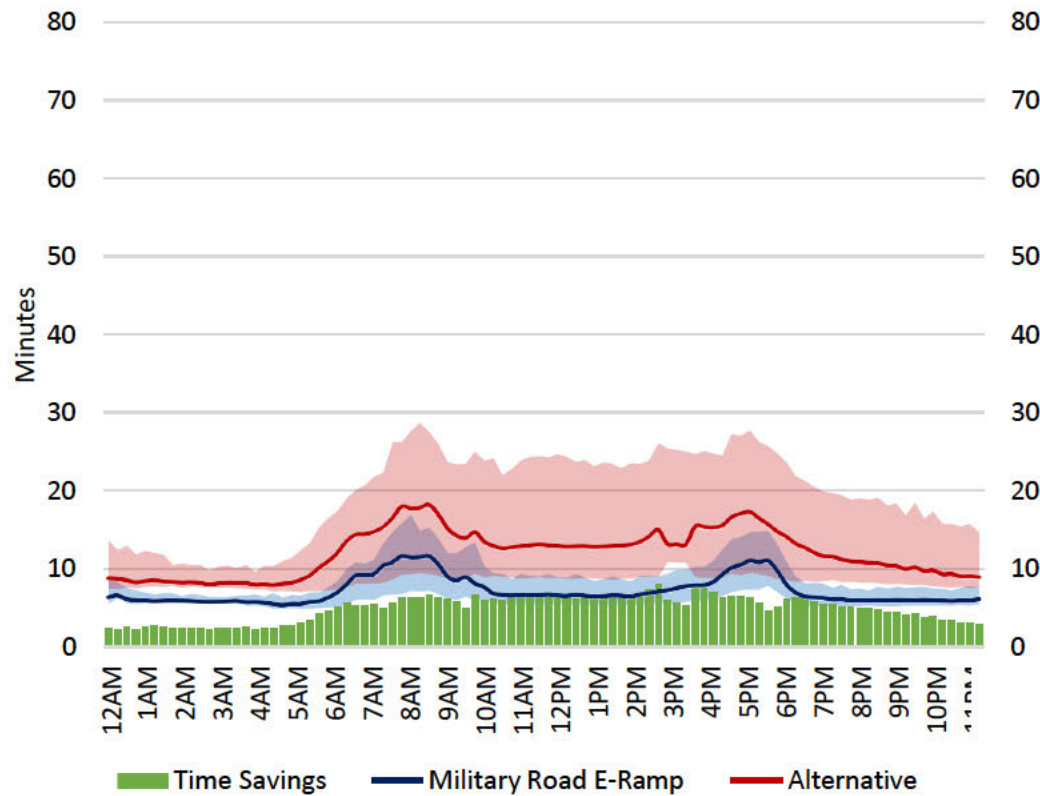
## Westlink M7 Motorway: South



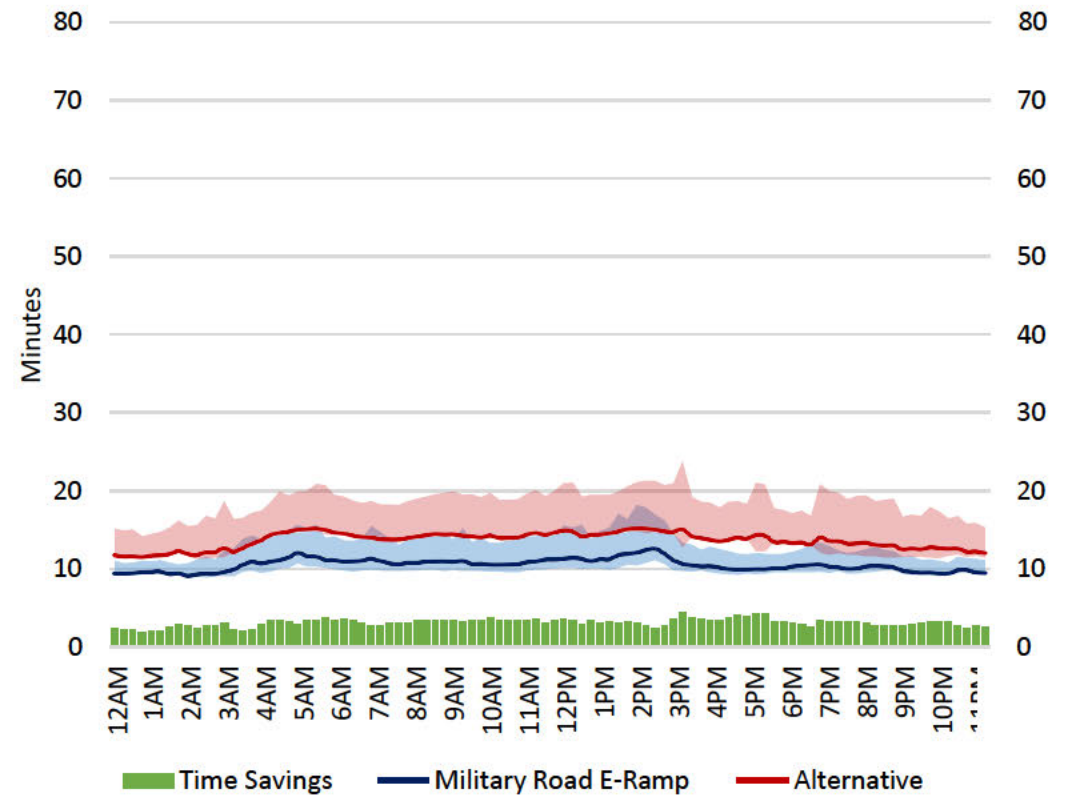


# Military Road E-Ramps

**Military Road E-Ramp: Southeast**

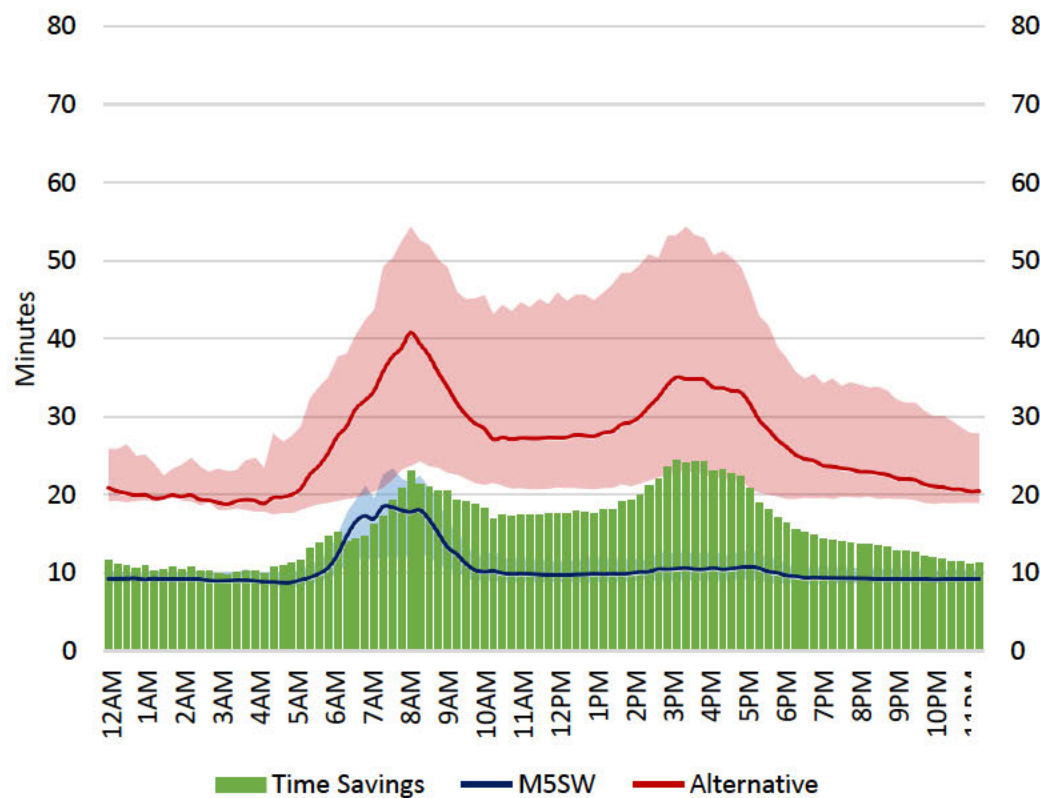


**Military Road E-Ramp: Northeast**

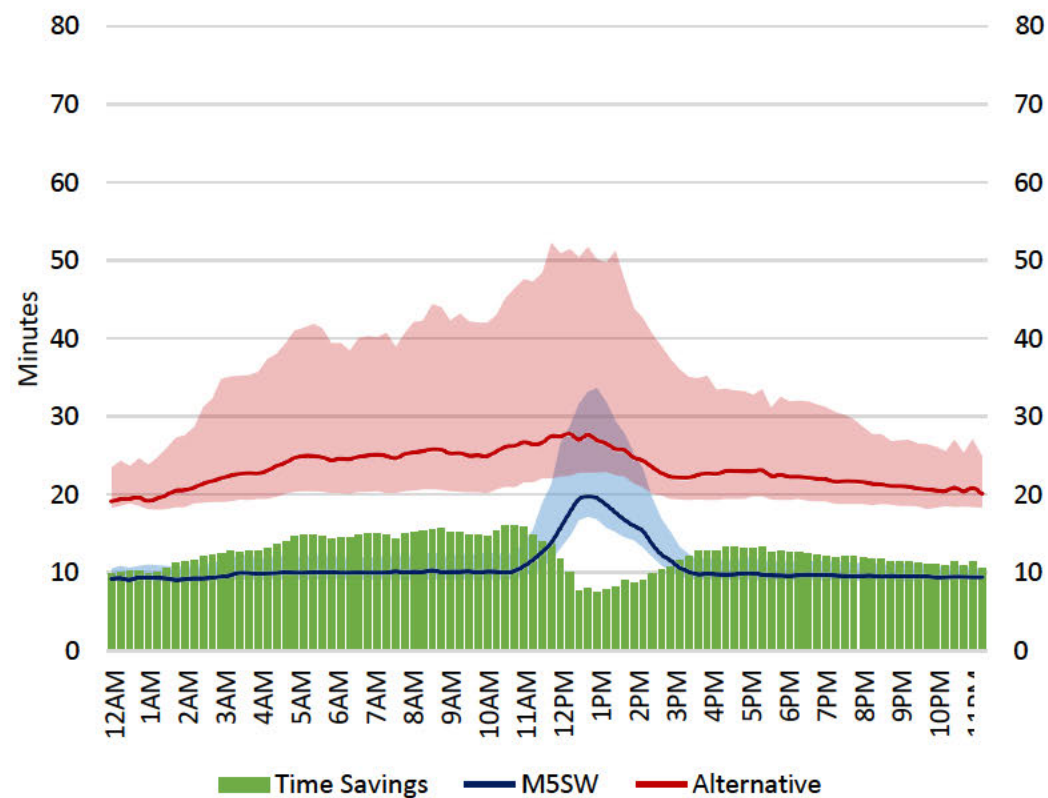


# M5SW

## M5 South-West Motorway: East

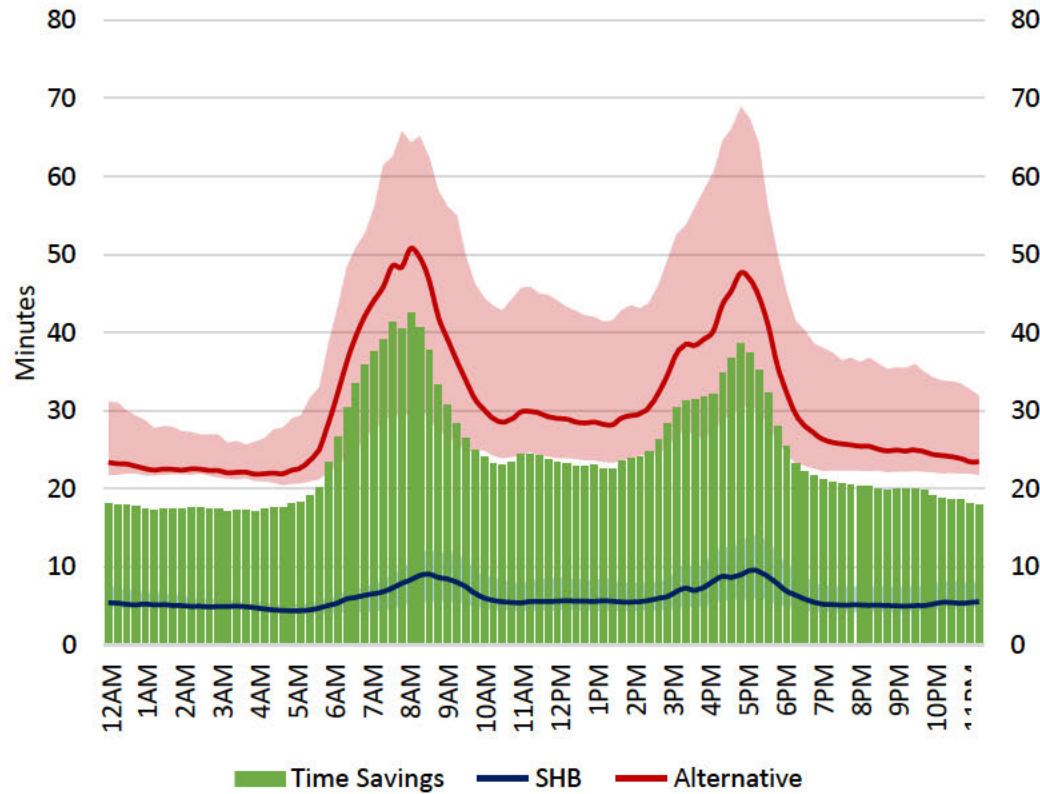


## M5 South-West Motorway: West

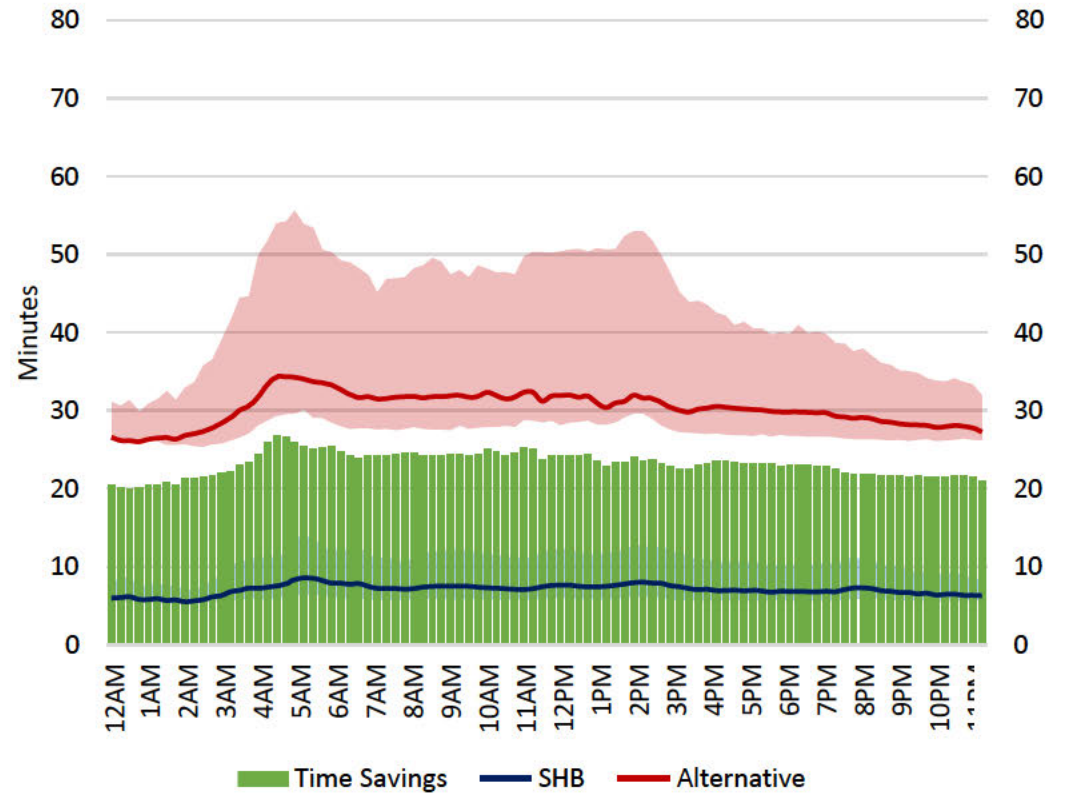


# Sydney Harbour Bridge

**Sydney Harbour Bridge: South**

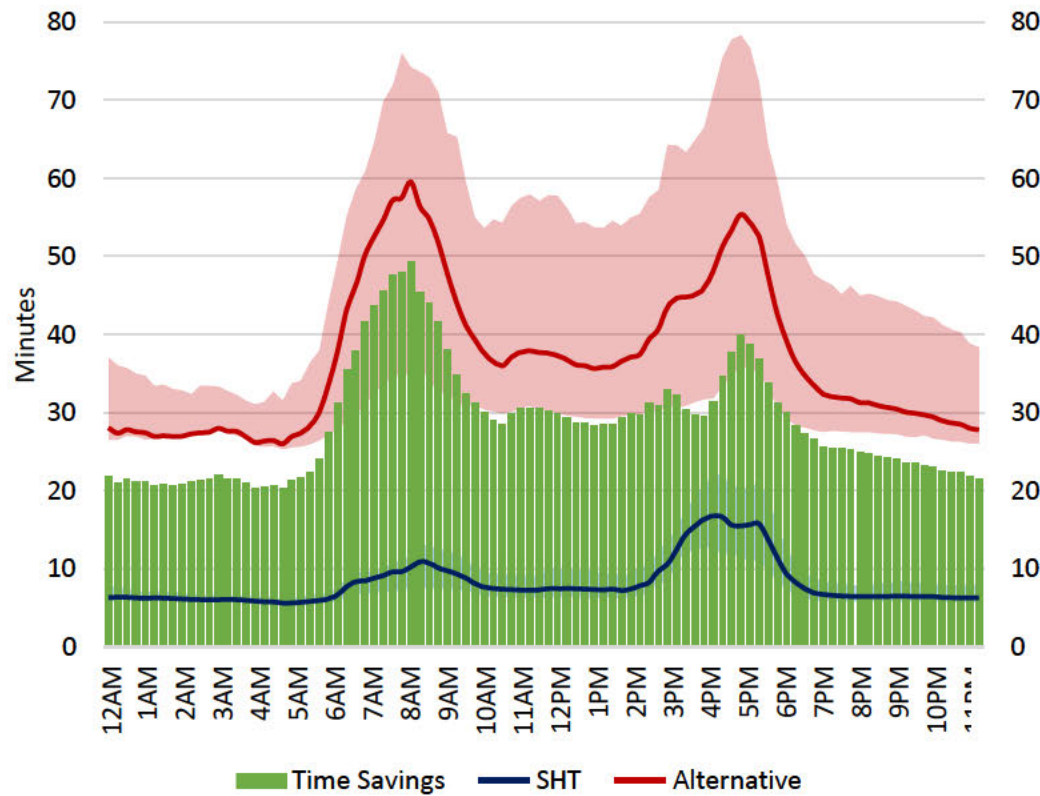


**Sydney Harbour Bridge: North**

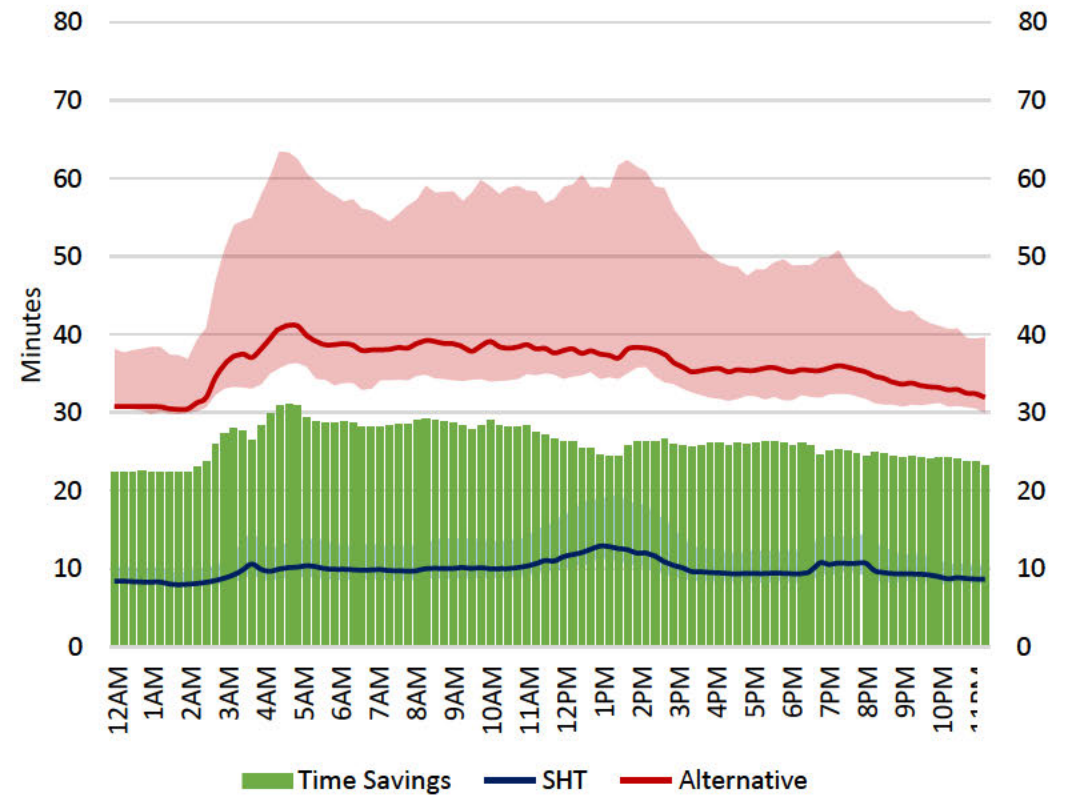


# Sydney Harbour Tunnel

**Sydney Harbour Tunnel: South**



**Sydney Harbour Tunnel: North**



# Tolling Customer Ombudsman (TCO)

Stakeholder Submission

Independent Toll Review  
New South Wales Government

BY EMAIL: [tolling\\_pmo@transport.nsw.gov.au](mailto:tolling_pmo@transport.nsw.gov.au)

## Response to NSW Independent Toll Review Interim Report

Dear Independent Reviewers,

I write on behalf of the Board of the Tolling Customer Ombudsman Limited (TCOL) in my capacity as Independent Chair of the Board. As you may be aware, TCOL is the operator of the Tolling Customer Ombudsman external dispute resolution scheme (TCO).

The Board expresses its considerable disappointment regarding the substantial factual errors concerning both TCOL and the TCO in the *Independent Toll Review: Interim Report* (the Interim Report).

These errors were made without first checking their accuracy with us. Unfortunately, the Interim Report makes recommendations based on the errors.

I will go through each in turn and hopefully correct the Inquiry's understanding before any final erroneous recommendations are made..

### **TCOL is an independent public company, limited by guarantee**

Most concerning is the Interim Report says at pages 19 and 174 that the TCO '*acts as an internal dispute resolution body*'. The claim is untrue.

The TCO is a company limited by guarantee and as such has its own board of directors. There are three directors:

- myself, as Independent Chair,
- a consumer director appointed from a recognised community or consumer group (i.e. from either a registered charity, legal aid or community legal service or a consumer advocacy group) and
- an industry director appointed by the industry member.

The backgrounds of each of the current directors of TCOL can be found at (<https://www.tollingombudsman.com.au/our-team/>).

TCOL is separate and distinct a corporate entity from Transurban. The TCOL directors are subject to directors' duties, and statutory obligations as set out in the Corporations Act 2001.

As you would appreciate, these duties require the board to act in the best interests of TCOL, not Transurban. The board is required to give effect to the company's objects, which are set out in clause 6 of the TCOL Constitution:

6.1 The company's objects are:

- (a) to maintain an independent Tolling Customer Ombudsman scheme in Australia and appoint an Ombudsman with the power to receive, investigate and facilitate the resolution of complaints directly relating to the applicable terms and conditions for, or customer service relating to, use of a toll road by a customer that have been unresolved by the relevant member;
- (b) to provide information to members to assist them in the development and maintenance of good complaint-handling practices; and
- (c) to set measures for, and monitor, the quality and consistency of the services provided by the Ombudsman.

### **TCOL has an approved governance structure, recognised by the Federal Government**

The Interim Report makes another unverified and erroneous claim without any explanation on page 19. It states:

*The TCO scheme does not have the acceptable governance and operating structure of other recognised industry ombudsman schemes in Australia.*

This is untrue and appears to be based on an outdated understanding of the TCO as it stood prior to June 2019 when, in its initial incarnation, it was a consultancy arrangement between the Ombudsman and the relevant toll road operators.

Both the Telecommunications Industry Ombudsman (TIO) and the Australian Financial Complaints Authority (AFCA) have similar models of governance to the current TCOL operated version, where a public company, limited by guarantee, operates an external dispute resolution scheme which is fully funded by members of the corporate operator. In each case, members are the businesses potentially liable to have complaints from their customers dealt with by the relevant scheme.

These schemes cannot reasonably be described as internal dispute resolution bodies, nor that they lack independence in dealing with complaints.

Further, all three organisations have been recognised by the Office of the Australian Information Commissioner (OAIC) as meeting its requirements ([Guidelines for recognising external dispute resolution schemes | OAIC](#)) to be a recognised external dispute resolution scheme for handling privacy-related complaints in their respective sector.

In addition, like the other recognised schemes, TCOL commissions, in consultation with the OAIC, an independent review of its operations every five years to ensure this recognition can be maintained.

### **TCOL does not understand the basis for some findings**

The Interim Report makes the following additional (and unsupported) assertions at page 174:

*There are concerns about the operation of the TCO. Motorists lack confidence in the TCO and are dissatisfied with current dispute resolution mechanisms. There is a lack of transparency about the funding and resources available to the scheme. Complaint resolution times are high. The TCO is not a government agency or statutory body, it is notably also not a member of the Australian and New Zealand Ombudsman Association (ANZOA). Transurban initiated the TCO, and it is understood funds the scheme giving rise to questions about its independence. Motorists are confused about where they should take their complaints.*

Breaking these claims down:

- the first assertion made is that ‘Motorists lack confidence in the TCO and are dissatisfied with current dispute resolution mechanisms’.

The Report offers no evidence or other support for its claim.

The Independent Toll Review published *A Public Consultation Summary Report* in August 2023 in which it summarised the submissions it received from stakeholders and the general public. In the section *What we heard – general public* no mention is made of the TCO, or the complaints system more generally.

It is therefore unknown as to where the Review finds evidence for its claim that motorists lack confidence in the TCO.

- the next assertion is there is a lack of transparency about the funding and resources available to the TCO, yet it proceeds to say that Transurban initiated the TCO, and that it is understood it funds the scheme.

The TCOL Board rejects the notion there is a lack of transparency and notes the factual inaccuracy of Transurban initiating the TCO – this was in fact initiated by CityLink in 2004.

The current governance structure of TCOL as operator of the TCO scheme was initiated by me in June 2019 with the assistance of the previous Tolling Customer Ombudsman, Mr Michael Arnold, in consultation with Transurban and Eastlink (although Eastlink declined to join the new scheme).

Setting this aside, the Annual Reports published by TCOL on the TCO website ([About Us - Tolling Customer Ombudsman \(tollingombudsman.com.au\)](https://www.tollingombudsman.com.au)) contain detailed audited financial reports and the revenue sections are clear the funding is obtained through member fees and investment returns.

The Interim Report then says this gives rise to questions about its independence.

This is a common refrain from consumers across all sectors where industry-funded external dispute resolution schemes operate, including the aforementioned schemes such as the TIO and AFCA. These are also fully funded by the businesses that that may be complained about under those schemes.

Structures such as the establishment of the schemes as a separate company with an independent board mitigate against issues of lack of independence.

In addition to the above transparency on financial matters, I would also like to draw your attention to the regular quarterly reports about the TCO’s operations, which can also be found on our website (<https://www.tollingombudsman.com.au/reports/>).

The reports are extensive and provide information about:



- the ways in which complainants make contact with the ombudsman for lodging their complaints (including the proportion that make contact by via electronic lodgement on the TCO site, by phone or by mail);
  - the locations of complainants;
  - the number of complaints received;
  - the nature of the complaints (e.g. that there was a wrongful application by Linkt of administrative fees or infringement fines);
  - the average time the TCO takes to deal with complaints;
  - the types of remedies (i.e. apology, removal of credit-listing, an offer to reduce or remove the amount alleged to be owing to Linkt, and non-financial resolution); and
  - the reporting of systemic themes and issues to Linkt. These include the ways in which Linkt is (inappropriately) using debt collecting agencies.
- The Interim Report says the TCO is not a government agency nor is it a statutory body.

Setting aside the distinction between the TCO EDR scheme and the corporate operator, TCOL, it is not clear why this is relevant.

Neither the TIO nor AFCA are governmental agencies or statutory bodies. Nor are several other similar industry-based organisations including the various Energy and Water Ombudsmen in each State.

The implication appears to be this is undesirable, but without explanation.

- The Interim Report also says ‘notably’ the TCO is not a member of ANZOA.

ANZOA is not an accrediting body, nor does it purport to be.

It also does not provide corporate memberships – each member is an individual, therefore it is more accurate to say the current Tolling Customer Ombudsman, Mr Phillip Davies, is not a member of ANZOA.

ANZOA has 24 individual members representing 14 Australian and 4 New Zealand Ombudsman organisations. 30% of the ANZOA membership (7 of the 24 individuals) work for AFCA and each other organisation has a single member.

However, there are other Australian ombudsmen who are not members of ANZOA, including:

- the Commonwealth Ombudsman,
- the Queensland Ombudsman,
- the Victorian Ombudsman
- the Australian Small Business and Family Enterprise Ombudsman and
- the Fair Work Ombudsman.

The non-membership of ANZOA does not mean the relevant ombudsman lacks independence or credibility.

- To demonstrate its commitment to the principles of best practice in ethical decision-making, TCO is:
  - a member of the International Ombudsman Association (IOA). Members of the IOA are required to meet the Association's standards of practice, including those of independence, impartiality, informality and confidentiality. (see [https://ioa.memberclicks.net/assets/docs/SOP-COE/IOA\\_Standards\\_of\\_Practice\\_English.pdf](https://ioa.memberclicks.net/assets/docs/SOP-COE/IOA_Standards_of_Practice_English.pdf)).
  - an External Dispute Resolution Scheme (EDR) that is recognised by the Office of the Australian Information Commissioner (OAIC) under the Privacy Act as being a scheme that may handle particular privacy-related complaints.
- The last assertion in the Interim Report extract above states motorists are confused about where they should take their complaints.

Again, the Report does not refer to any evidence or other sources to support its assertion.

A person seeking to make a complaint regarding Linkt can lodge the complaint with its complaints section: <https://www.linkt.com.au/contact-us/complaints/sydney>.

A complainant who is dissatisfied with the way Linkt dealt with their complaint is informed by Linkt on its site and in its correspondence with the complainant that they can make a complaint about Linkt to the TCO (<https://www.linkt.com.au/contact-us/complaints/sydney>).

The TCO website clearly sets out the process for having the complaint dealt with by the TCO (<https://www.tollingombudsman.com.au/make-a-complaint/>).

TCOL is aware however of some motorist confusion in NSW about where to take their complaints. In some instances, this confusion stems from Eastlink and e-Toll not being members of the TCO scheme and relevant consumers are referred by the TCO to the appropriate mechanism.

On other occasions, this arises from the fact TCO has no jurisdiction to deal with state-imposed infringement notices issues after non-payment of a toll. Again, TCO will refer relevant consumers to the appropriate State enforcement agency, or to the relevant State Ombudsman – in this case the NSW Ombudsman.

## Timeliness of resolutions

The Interim Report claims complaint resolution times are high. The TCOL Board certainly accepts complaint resolution times are higher than they have been in the past.

However, the latest TCO quarterly report (for the period 1 October to 31 December 2023) states:

- Over the reporting period there has been a slight reduction in the 31-60 and 90 day categories – indicating an improvement to the overall issue of timeliness of complaint handling for the last 12 months.
- The ombudsman, during his quarterly meetings with Transurban, raised the issue of timeliness as one that needs to be monitored and addressed.

Over 90 percent of complaints made to the TCO involve relatively small amount claims that are relatively uncomplex. These are usually resolved in a reasonably short period of time,

subject to delays in receiving responses from Linkt regarding the complaint. The TCO's timeliness compares favourably with the time the TIO and AFCA take to resolve complaints.

### **Recommendation for a State Ombudsman for toll complaints**

Seemingly in reliance on these factual errors about the nature and operations of TCOL and the TCO EDR scheme, the Interim Report proceeds to recommend a new body, envisioned as State TollCo, be established so as to include the role of being a dispute resolution body for complaints regarding Transurban along with the other tolling companies, presumably including e-Toll and relevant state agencies.

As mentioned, this recommendation erroneously assumes that an external dispute resolution body does not already exist for dealing with Transurban complaints.

The establishment of yet another external dispute resolution scheme will involve unnecessary establishment and operational costs, which will ultimately be passed onto tollway users, either through increased taxes if government funded, or through increased fees and charges if industry funded.

However, if the scheme will be industry-funded, this will presumably give rise to the same critique levelled at TCOL for being predominantly funded by Transurban and thus not solve the perceived independence issue the Inquiry has identified.

The TCO operates as a single scheme across the three states in which Transurban operates. The creation of a NSW only State TollCo scheme will add transaction costs with Transurban being required to meet any additional and different reporting and other requirements of a new scheme.

The TCO has an annual revenue budget of \$324,000 and, in 2022-23, handled 736 complaints, approximately 32% of which (240 complaints) arose from NSW based customers.

The creation of State TollCo as a dispute resolution scheme to resolve less than 250 complaints per year is not economically viable, nor is it an efficient use of government and industry resources. Given there is no data to suggest customers are not aware of their right to complaint to Linkt Sydney, and Transurban is required to notify complainants of their right to escalate their concerns to the TCO scheme if they are unhappy with Transurban's internal dispute resolution response, there is also no basis for any expectation complaint numbers would increase following the establishment of State TollCo.

Further, the operation of a State TollCo dispute resolution scheme in NSW and the TCO in the other two states will add, rather than reduce, confusion amongst tollway users, particularly for users who travel interstate and use tollways.

### **Alternate options**

If a public benefit were to be seen in establishing a statutorily mandated external dispute settlements scheme, the TCOL Board respectfully suggests there are better ways of doing so than the Interim Report suggests.

A more effective and lower cost mechanism would be the establishment of a co-operative legislative scheme by the three tollway states of NSW, Victoria and Queensland.

The legislation could require the tollway operators to be members of a statutorily approved independent dispute resolution scheme. The recognised scheme would be required to meet statutory set standards of independence and due process.

TCOL could make relevant adjustments to its Constitution and Terms of Reference to meet those standards, where required, and could operate the recognised scheme. This would follow the model relating to the TIO.

Section 128 of the *Telecommunications (Consumer Protection and Service Standards) Act 1999* and similar sections in the *Corporations Act 2001* and *National Consumer Credit Protection Act 2006* mandate that relevant providers be a member of the respective approved schemes (TIO and AFCA respectively).

An example of a co-operative legislative scheme is the Uniform Consumer Credit Code (UCCC) as it was first introduced in 1993 (and which has now been superseded by federal legislation).

The relevant State ministers for consumer affairs agreed that Queensland would enact the UCCC in a form agreed by the ministers, and that each other State would enact legislation providing that the UCCC as enacted in Queensland is the law in that other State.

## **Conclusion**

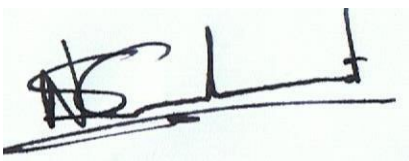
I trust the above information will assist in the errors of the Interim Report not being repeated in the considerations leading up to the preparation of the Final Report and will allow the Inquiry to be better informed in its ultimate recommendations.

Ideally, we would like to ask the Independent Toll Review to correct, or at least not repeat, the errors in the Interim Review.

We also ask that we be provided a fair and reasonable opportunity to respond to any proposed assertions of fact regarding the TCO to avoid incorrect claims in the final report – which if made would undermine the credibility of the Report.

Finally, I would be delighted to have the opportunity to speak with you should anything be unclear or to provide further assistance to the Review.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'N. Crowhurst', written over a horizontal line.

**Nicolas Crowhurst**  
Independent Chair  
Tolling Customer Ombudsman Limited

# Transport Workers Union (TWU)

Stakeholder Submission



---

**Submission**

***Independent Toll Review – Interim Report***

*13/05/2024*

**Transport Workers' Union of New South Wales**

---



# Transport Workers' Union of NSW

Richard Olsen State Secretary | P: 1800 729 909 | F: 02 8610 8099 | E: info@twunsw.org.au | W: www.twunsw.org.au

ABN: 77 710 588 395

## Contents

1. Summary of Recommendations.....	3
2. About the TWU .....	3
3. Introduction .....	3
4. Reflection.....	4
5. Conclusion + Recommendations.....	5



## 1. Summary of Recommendations

- 1.1 The Transport Workers' Union of NSW (TWU) believes that the interim report presented by the review provides a valuable collection of findings for the future of toll road equity in Sydney.
- 1.2 The TWU would like to provide the following pieces of feedback / recommendations for the eventual final report, all of which are contextualized further within this submission;
  - For the sake of deterring “rat runs”, fostering an equitable system, and attracting greater use of toll roads by heavy vehicles, the review should not consider any increases to the heavy vehicle multiplier in the final report;
  - Further consideration of the contextual factors associated with professional heavy vehicle operation, such as the cost of vehicle registration and premium cost of tolls being attributed to the same reasoning – that being road wear and tear;
  - Thought towards a heavy vehicle toll charge cap, even with the declining distance-based model in mind, given the great lengths trucks typically travel on a daily and weekly basis – declining prices alone may not be enough to incentivise a worthwhile increase in toll road usage for truck drivers;
  - Ensure that owner drivers who are sub-contracted by operators and larger transport entities are also included in whatever initiatives may be available for peak and off-peak pricing, especially in the suggested “initial key focus” stage outlined in Recommendation 7, beneath price reforms; and
  - A specific section in the final report dedicated to the context of heavy vehicles specifically, so that they are not thrown to the wayside, and that all relevant proposals are taken into account as needed.

## 2. About the TWU

- 2.1 The TWU represents tens of thousands of people in Australia’s road transport, aviation, oil, waste management, gas, passenger vehicle and freight logistics industries.
- 2.2 With over one hundred years’ experience representing the workers who conduct Australia’s crucial passenger and freight transport tasks, the TWU has been proactive in advocating for the establishment and improvement of industry standards which advance the lives and safety of transport workers, their families and the community at large.

## 3. Introduction

- 3.1 The TWU welcomes the opportunity to provide feedback on the Independent Toll Review’s Interim Report. The TWU would like to thank the reviewers for facilitating this submission in place of a face-to-face meeting. Additionally, the review should be congratulated for delivering the interim report with such valuable data and findings.
- 3.2 As a stakeholder who has contributed by way of a written submission, as well as a public





consultation appearance in 2023, the TWU is ultimately invested in the results of the final report. This submission will be a brief summary of the TWU's thoughts regarding certain areas in the interim report.

#### 4. Reflection

4.1 Generally speaking, there are many valuable findings within the review's interim report. The TWU has consistently been vocal about the various flaws of Sydney's tolling system, and has been a long-standing advocate for reform.

4.2 The TWU is in agreement with a number of the findings presented in the interim report. The TWU has long been trying to shed light on the greater financial impact of tolls faced by Western Sydney motorists, and is pleased to see that this reality has been recognised in official capacity.

4.3 The review's suggestion of a declining distance-based system for toll structure is a step in the right direction. This methodology of charging tolls could benefit heavy vehicle drivers, as they travel network lengths greater than that of a typical commuter on a daily basis. Additionally, the suggestion of peak/off peak pricing could also prove to be beneficial for freight operations at night time.

4.4 The TWU notes that Recommendation 7, under price reforms specifically, highlights freight operators as the subject of initial key focus for peak and off-peak pricing. The TWU would again emphasise on owner drivers who are sub-contracted under larger freight operators to be included in this. This should also be specifically mentioned.

4.5 Furthermore, consideration of a new vehicle classification, relevant to mid-sized heavy vehicles, is very welcome, and remains consistent with suggestions raised by the TWU in the past. As detailed in the TWU's initial submission, the inequitable pricing structure shared by trucks varying in size and weight seemed arbitrary in its justifications.

4.6 However, in conjunction with the above, the same paragraph (page 15) discussing a new mid-size classification continues to read;

*"We are not proposing an increase in the heavy vehicle multiplier at this time, though some have suggested this, and further consideration will be given to the issue before our Final Report is completed. We see a need to attract greater use of the toll roads by trucks for freight deliveries, including intercity deliveries."*

4.7 Though the review would be well aware of this, the TWU would again argue that any raise in multiplier for heavy vehicles will only serve to further facilitate "rat runs" performed by heavy vehicles. The TWU urge the review to not consider an increase in the final report, as it is implied as a possibility in the above excerpt. Raising heavy vehicle multipliers will be detrimental to the overall goal of attracting greater use of the toll roads by trucks.

4.8 On page 16, beneath "Our price reform objectives" (present on page 15), the fourth objective notes a desire to ensure that proposed changes to tolling arrangements for motorcycles and heavy vehicles were taken into account as much as possible. In pursuit of this, the final report

would benefit from a dedicated section specifically emphasising on the heavy vehicle context.

- 4.9 A clear emphasis on heavy vehicles will help to ensure that their specific arrangements are not thrown to the wayside. This is especially important considering contextual factors that contribute to the high toll burden faced by owner drivers and operators merely trying to complete work.
- 4.10 As covered in the TWU's initial submission for the review in 2023, one of the primary cost of living contributors and concerns for owner drivers is toll roads. These burdens come from contextual factors such as the high-cost tolls for heavy vehicles, the frequency at which heavy vehicles use toll roads in any single day, and the lack of a toll charge cap.
- 4.11 In addition to the above, it must be reaffirmed that the cost of registering a heavy vehicle can extend far beyond that of a standard passenger vehicle. Currently, the highest level of cost for the registration of a truck in NSW can be awarded to long combination trucks (RT3), which see a cost of \$14,829 (regardless of axles) to register. Even a short combination prime mover can reach up to \$5,316 to register, depending on the number of axles.
- 4.12 As discussed in the TWU's initial submission, road wear and tear is likely a considerable factor in the determination of heavy vehicle registration cost, and also remains a key contributor to the currently upheld justification of the heavy vehicle toll multiplier. Owner drivers and operators are effectively being charged premiums from all angles for the same reasoning, which, considering the overall burden and costs, is entirely inequitable and must both be considered and highlighted in the final report.
- 4.13 The review implies that due to certain pieces of data and lived experiences of traffic distortions, toll caps may be regarded as an inadequate measure in comparison to declining distance-based pricing. In the case of heavy vehicles, it may still be worth considering the possibility of a toll cap, with the aforementioned factors in mind. Moreover, owner driver perspectives suggest that a toll cap could be a significant measure in influencing their usage of toll roads.
- 4.14 Even with a declining distance-based structure, costs could still reach points that are considered too high for owner drivers and operators. This is simply due to the distance that can be covered by a truck on any given day, depending on their jobs and what they are carting. Unless, of course, the declining costs would eventually reach such a point that the charges are next to nothing – though, the TWU can almost guarantee this reality would not come to be, as it would remain unfavorable for the interests of toll road operators.
- 4.15 Therefore, a toll charge cap is perhaps the most realistic, yet beneficial measure of ensuring heavy vehicle operators and owner drivers are not squeezed on the road. It is likely that in the case of truck drivers, a declining price may not be enough to facilitate a worthwhile increase in toll road usage.

## **5. Conclusion + Recommendations**

- 5.1 The TWU would again like to thank the review for the opportunity to respond to the interim report by way of a submission. There are valuable findings and insights in the report, and the TWU is hopeful that the final report will deliver strong suggestions to the NSW Government in

pursuit of meaningful tolling reforms.

5.2 Road Transport keeps the state moving. The TWU are firm in the belief that the current tolling arrangements faced by Sydney motorists is entirely inequitable, and should be subject to a review such as this one. However, the TWU is also adamant that the current arrangements adversely impact heavy vehicle drivers, requiring unique consideration in certain areas.

5.3 Below is a summary of the recommendations for the final report, also present at the beginning of this submission;

- For the sake of deterring “rat runs”, fostering an equitable system, and attracting greater use of toll roads by heavy vehicles, the review should not consider any increases to the heavy vehicle multiplier in the final report;
- Further consideration of the contextual factors associated with professional heavy vehicle operation, such as the cost of vehicle registration and premium cost of tolls being attributed to the same reasoning – that being road wear and tear;
- Thought towards a heavy vehicle toll charge cap, even with the declining distance-based model in mind, given the great lengths trucks typically travel on a daily and weekly basis – declining prices alone may not be enough to incentivise a worthwhile increase in toll road usage for truck drivers;
- Ensure that owner drivers who are sub-contracted by operators and larger transport entities are also included in whatever initiatives may be available for peak and off-peak pricing, especially in the suggested “initial key focus” stage outlined in Recommendation 7, beneath price reforms; and
- A specific section in the final report dedicated to the context of heavy vehicles specifically, so that they are not thrown to the wayside, and that all relevant proposals are taken into account as needed.

# Transurban

Stakeholder Submission

NSW Independent Toll Review

# Interim Report

Transurban response

14 May 2024

***Thank you for the opportunity to respond to the Independent Toll Review Interim Report.***

We support the objectives of the Review and are aligned in our efforts to make toll roads simpler and fairer for NSW motorists. We also recognise the significant work that Professor Allan Fels and Dr David Cousins have put into the Independent Toll Review to date, and we appreciate the scale and thoroughness of this undertaking.

Our detailed response to the Review's Interim Report notes the findings and recommendations we support, and those where we have presented our views to assist the Government and Reviewers in aligning the recommendations with the objectives of reform.

We welcome the opportunity to progress our discussions on how Sydney's toll roads can continue to support the city's liveability and prosperity for years to come.

**Michelle Jablko**  
*Chief Executive Officer*

# Contents

<b>1. Executive summary</b>	<b>4</b>
<b>2. Public-private partnerships</b>	<b>7</b>
2.1 Benefits of private sector involvement	7
2.2 Toll contracts and tolling regimes	8
2.3 Competition and regulation	12
<b>3. Impacts of the proposed model</b>	<b>14</b>
3.1 Network tolling scenarios	14
3.2 Impacts	15
3.3 Proposed role of IPART - cost of tolls	21
3.4 Proposed role of IPART - impacts on concessionaires and investors	21
3.5 Proposed role of State TollCo	21
<b>4. Administration improvements</b>	<b>23</b>
4.1 Customer experience	23
4.2 Pricing and toll rebates	24
4.3 Transparency	24
4.4 Toll notice improvements	25

# About Transurban

*We're an Australian-owned company, and everything we do is about getting people where they want to go, as quickly and safely as possible – from designing and building new roads to researching new vehicle and road safety technology.*

Since 1996, we've been building and operating toll roads in Melbourne, Sydney and Brisbane, as well as in the Greater Washington Area (United States) and Montreal (Canada).

We employ more than 3,900 people across these cities, as well as many more through the delivery of projects – such as the M7-M12 Integration Project in Sydney which is supporting job creation in Western Sydney.

Transurban's NSW story started with our partnership with the then government to deliver the Westlink M7, which opened to traffic in 2005.

Since then, we have built a track record of partnering with multiple governments to successfully deliver and manage key road infrastructure, including delivering NorthConnex and WestConnex, and widening the M5 West and Hills M2 to help ease congestion as our city continues to grow.

On average, one million trips are made on our Sydney roads every day. These trips are being monitored 24/7 by our traffic control operators to ensure that motorways are safe and reliable for our customers. Our incident response crews assist any motorist in need and return the motorway to its free-flowing conditions.

An ASX-listed company, Transurban represents one of the most significant infrastructure investment opportunities available to everyday Australians. More than 70% of our investors are Australian. In addition many Australians hold Transurban shares through industry superannuation funds including UniSuper, AustralianSuper and Aware Super. These everyday Australians, like all our investors, share in the success of our business.

We are committed to strengthening communities through transport, providing leadership and taking action on environmental and social issues, and investing in both to create lasting benefits for all our stakeholders.

## Acknowledgement of Country

Transurban acknowledges the Traditional Owners of the lands across Australia – in particular where we own and operate toll roads – and we pay respect to Elders past and present.

As caretakers and custodians of transportation in urban communities we have a deep respect for First Nations communities and culture and seek to celebrate pride in Country through engagement with, and providing opportunities for, First Nations peoples. We also celebrate connection to Country through artwork and design elements in our infrastructure.

To achieve our purpose, we will continue to foster positive and sustainable relationships with all communities, while progressing our efforts to contribute to Australia's reconciliation journey.

# 1. Executive summary

Sydney's toll-road network has been instrumental in supporting the liveability and prosperity of a sophisticated, growing city. It has played a critical role in the effective movement of people, goods and services, providing travel-time savings, and safer, more reliable journeys.

This infrastructure is the result of significant achievements by multiple governments, dating back almost a century to the Sydney Harbour Bridge. While keeping the sector heavily regulated and setting the toll price, governments have turned to the private sector for support, especially when under pressure to meet competing needs such as funding schools, hospitals and public transport links.

The result has transformed the way we move. Despite Sydney's population growing by around one million people in the past decade, morning peak travel time between the CBD and Parramatta has decreased by nearly 50%, or 25 minutes. Similarly, NorthConnex has reduced morning peak travel time between the M1 and M2 by around 72%, or 21 minutes.

However, the evolution of Sydney's toll roads has also resulted in a patchwork of different tolling regimes. The Independent Toll Review Interim Report is an important step in the process of understanding how we can deliver even better value and outcomes for Sydney into the future. In the past 20 years, Transurban and our partners have built a track record of working with both Labor and Coalition governments to successfully deliver and manage city-shaping infrastructure, and we look forward to that continuing, to deliver benefits to our customers and communities.

To assist in our review of the Interim Report, Transurban has consulted with Professor Graeme Samuel AC, former Chair of the Australian Competition and Consumer Commission, especially on matters related to competition and regulation.

## **Our response**

Transurban has always been open and willing to discuss opportunities to improve Sydney's toll-road network, with a focus on finding practical solutions that meet Government objectives. Along with our investment partners, we have long been open to reform – to developing a more consistent approach to the development of tolling regimes to enhance efficiency, fairness, simplicity and transparency for users; and to joining the NSW Government in our shared focus on enhancing customer experience.

We continue to look for ways to create more value for motorists, approaching our business through a customer lens to deliver real and clear value on and off the road.

The Interim Report includes ideas that we've long advocated for, such as recommended changes to the NSW enforcement process regarding toll notices. We also support on-road signage improvements to help drivers make informed decisions. We have already taken steps and will continue to invest in and work on initiatives to improve this experience for our customers.

The Interim Report notes that, in the process of undertaking reform, existing contracts should be respected – another point we support. Following discussions with our investment partners in Sydney toll road concessions, there is a commitment from all parties to develop a suitable network-wide solution. We believe the principles of such a solution could be agreed within a short period of time within existing regulatory frameworks.<sup>1</sup>

Transurban remains open to finding alternative pricing regimes that are simpler, that result in more efficient network performance and that are equitable. This may include a range of measures such as distance-based rates, with infrastructure



charges for major tunnel structures and time-of-day pricing, noting solutions may vary on different roads to better achieve these objectives. Transurban believes this will deliver better overall network performance with a fairer and more equitable outcome.

Customer research commissioned for this response found that drivers are receptive to a peak/off peak (night and inter-peak) pricing approach. More than 60% of those surveyed were supportive of peak/off peak pricing and 57% thought this approach would improve toll pricing fairness. Any such solution would require discussion with our partners and require their consent.

Our response to the Interim Report also raises areas that need to be explored to help the public, the NSW Government and other stakeholders understand potential impacts of the draft findings and recommendations.

We have genuine questions about how some of the proposals in the Interim Report would work in practice.

Investment in our roads is supported by a complex funding structure (Figure 3) with numerous co-investors and lenders who, alongside us, have invested more than \$36 billion into Sydney's road network. There have been times when contracts have been altered by agreement, to support the delivery of new road or public transport infrastructure.

However, these are investments and contracts lasting several decades, that should be viewed through a long-term lifecycle lens. This structure gives price transparency and consistency. Viewing these investments only from a short-term perspective would result in higher tolls and fluctuations based on the economic environment, which is not efficient and provides less price transparency for motorists.

Our analysis also shows that other aspects of the Interim Report's proposed solutions need to be reconsidered as they would run contrary to the NSW Government's objectives of improving the efficiency, fairness, simplicity and transparency of the toll road networks.

Our preliminary modelling of the Interim Report's proposed tolling solution suggests that overall, motorists in some areas of Sydney will pay more than they would under current arrangements as a result of: the proposal for distance-based tolling; the proposed introduction of two-way tolling on roads that are currently tolled in one direction; and the removal of toll caps. People who both live and work in Western Sydney, for example, would face higher tolls due to the increased prices on Westlink M7 (Figure 6).

Our preliminary modelling also suggests the proposed solution is likely to create unintended congestion consequences, with a preliminary estimate of 1.3 million hours<sup>2</sup> of additional travel time per year compared to current arrangements. The current tolling network is well established, so consideration should be given to the practical impacts of the proposed solution in terms of network congestion.

The proposed toll model would increase toll prices for some trips, which is likely to encourage motorists off some toll roads onto neighbouring arterial roads, increasing congestion on roads that are already at capacity.

The Interim Report suggests that toll pricing regulation is needed. However, toll roads are already one of the most regulated public assets in Australia, with prices set by governments at the start of concessions. Neither Transurban nor any other private toll-road operators set the prices of tolls, and tolls do not change according to ownership.

The Interim Report's proposal for a unified, network-wide price structure and a state-owned tolling entity – State TollCo – would add a level of bureaucracy that we believe would provide no meaningful benefit for toll road users. The proposal to set toll prices via declining distance-based tolling may appear simple at face value, but it raises challenges in its implementation for both motorists and toll road concessionaries.

Currently, our customers can calculate and readily understand the cost of each trip on a toll road. A switch to declining distance-based tolling would not make price transparency simpler, with different costs per kilometre applying to motorists for each trip, depending on their origin and destination.

Our research shows drivers choose to pay for toll roads for their convenience, and because these roads help drivers get to their destinations faster and more safely<sup>3</sup> – not because of a lack of alternative transport options. On average, Linkt customers travelling in a private vehicle spend \$13.21 per week on tolls, with two-thirds spending less than \$10 per week.<sup>4</sup>

It is important for the Toll Review to consider the benefits drivers are already experiencing each day. The existing model has created connections that make moving around the city more efficient, predictable, and safe, ensuring Sydney remains one of the most liveable cities in the world.

Priorities may change with governments but we have a demonstrable track record of willingness to explore reforms and of working with the State on solutions that benefit motorists and communities.

---

<sup>3</sup> Transurban, August 2023, Industry Report: Urban Mobility Trends, page 21

<sup>4</sup> Transurban (internal data), April 2023 to March 2024, Linkt Sydney consumer customers

## 2. Public-private partnerships (PPPs)

### Summary

- PPPs are an effective model for delivering toll roads. PPPs have a track record of providing outcomes which benefit the community, freeing up Government to spend more money on schools, hospitals and transport links.
- Toll roads are one of the most highly regulated public assets in Australia with toll prices and maximum escalation rates set by Government at the start of concessions.
- Demand-based PPP models deliver reduced construction costs and improve customer service relative to other regulatory regimes.
- Compared to other forms of regulation assessed in the Interim Report, demand-based PPPs typically result in substantially lower toll prices in the critical early years of operation, where traffic volumes are lower and demand is ramping-up.
- There are significant risks inherent in large-scale infrastructure projects undertaken under a PPP arrangement. When risks materialise they are typically born by private investors, without impacting the motorist's experience.
- Changes to tolling regimes mid-concession hold significant risk. Investments have been made in good faith, and a shift in regulatory model to change existing contracts would call into question the State's reputation as a safe and stable region for future investment.

PPPs are used globally, and Australia has been a longstanding proponent of this model, which account for around 10% of the share of Australia's infrastructure spend.<sup>5</sup>

Planning for what is now the Sydney orbital road corridor began more than 70 years ago, under the 'County of Cumberland' planning scheme and was further developed by various policy measures implemented by both sides of government, including the then Labor government's 'Action for Transport 2010' plan (1998) which introduced cashless electronic tolling with new alignments for Western Sydney Orbital, Lane Cove Tunnel and Cross City Tunnel. Since then, network and motorway upgrades in Sydney have primarily been completed using the economic PPP model.

### 2.1 Benefits of private sector involvement

The ability of governments and the private sector to work together to create city-shaping infrastructure has been critical to the prosperity and liveability of Sydney.

Sydneysiders depend heavily on private vehicles, with our research finding most people surveyed (55%) commute to work or study via private vehicle.<sup>6</sup> The city's population is growing, and by the early 2040s it is estimated to rise by around 25%,<sup>7</sup> which will see more than 1.4 million additional people living, working and commuting around the city.

Despite this likely growth, the NSW Government is facing a road funding shortfall over the next decade. Additionally, loss of revenue from declining fuel excise (due to the uptake of more fuel-efficient cars and as people transition to electric vehicles) means even less revenue available for road funding.

---

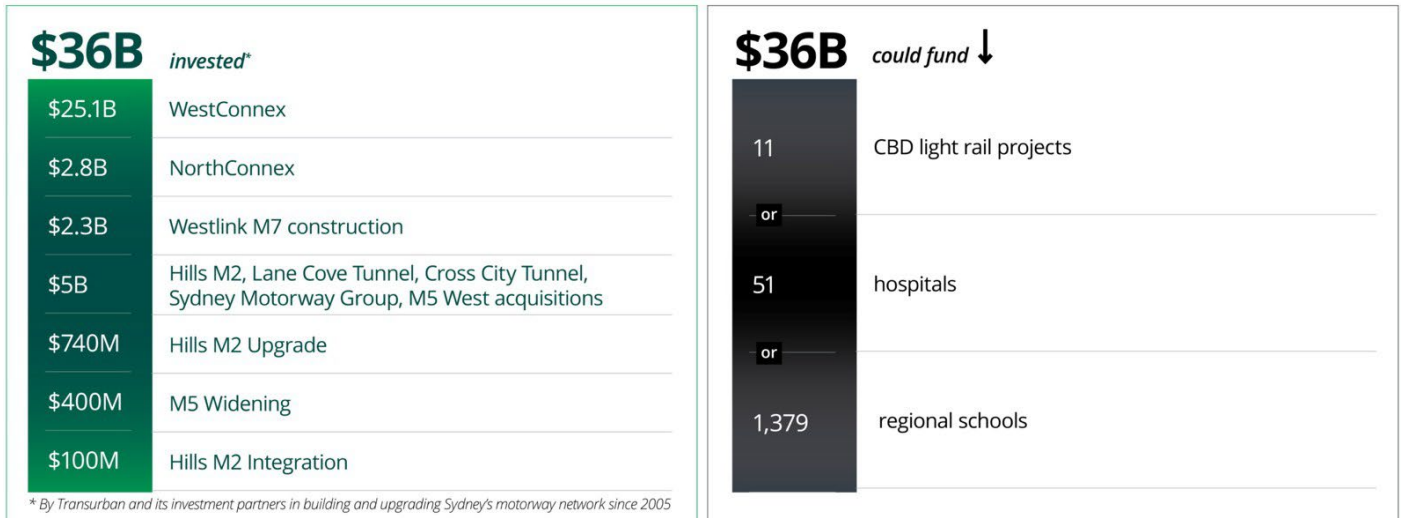
<sup>5</sup> Infrastructure Partnerships Australia, 2019, Australian Infrastructure Audit 2019

<sup>6</sup> Transurban, August 2023, Industry Report: Urban Mobility Trends, page 15

<sup>7</sup> DAE September 2022 Land Use Forecasts, January 2023 Release

Economic PPPs have allowed the government to provide tangible outcomes for the community, while transferring the significant patronage risk to the private sector. This frees the public balance sheet for other priorities, such as health, education and public transport services (Figure 1).

**Figure 1. Transurban investments in NSW<sup>8</sup>**



Since 2005, Transurban and its investment partners have injected more than \$36 billion (Figure 1) into Sydney's motorway network.

This has included upgrading existing assets such as Westlink M7 through the M7-M12 Integration Project which will improve connectivity in Western Sydney by reducing travel times on the M7. The new M12 will improve connections to the new Western Sydney Airport and also benefits from the upgrade to the M7.

It also has seen the delivery of new infrastructure such as NorthConnex and WestConnex that has fundamentally changed the way people and freight move around the city. Private sector investment in WestConnex has allowed the NSW Government to fund a range of other initiatives for the benefit of the NSW population.

## 2.2 Toll contracts and tolling regimes

Each privately owned toll road is governed by a concession deed – the contract between the NSW Government and private sector participants. We are pleased the Interim Report notes that, in the process of undertaking reform, the Government should respect these existing contracts.<sup>9</sup>

These deeds dictate the commercial arrangements for the ownership and operation of each road and set out the concession term and tolling regime including toll prices and escalation.

As outlined in our previous submission to the Review (pages 14-15), toll roads are one of the most highly regulated public assets in Australia, with toll prices and the maximum escalation rates set by Government at the start of concessions.

Price increases essentially smooth the recovery of costs incurred in constructing, operating, and maintaining a toll road over its full concession period. Concession deeds are usually agreed before construction commences and some years before a road opens or before a road is acquired. Deed terms are based on detailed assessments of alternative toll price paths and regimes,

<sup>8</sup> NSW Government budget (2023-24) Budget Paper No.01: Budget Statement. Calculations based on the following: \$1.4 billion for 19 new and 35 upgraded regional schools (over four years); and \$700 million for Rouse Hill Hospital development. Audit Office of NSW, 11 June 2020, NSW Auditor-General's Report: \$3.1 billion for the CBD and South East Light Rail

<sup>9</sup> NSW Independent Toll Review Interim Report, page 20

including consideration of their network impacts and overall community benefits. Who the government has chosen to own and operate a toll road does not affect the toll price.

In setting the initial toll price and escalation rates, the government decides how to best meet the objectives of funding a project and provide a value-for-money toll proposition that will make paying the toll attractive to motorists through travel-time savings and reliability. Competitive procurement processes run for the concessions were based on these toll parameters as well as risk profiles set by Government. This has ensured governments have received fair market value for each concession, reflecting both cost of capital at the time of the bid and the risks being transferred to the private sector.

The Interim Report states toll prices are currently set 'administratively by governments'<sup>10</sup> with a view to minimising the funding burden to government. This overly simplifies the approach that governments adopt in setting toll prices. We do not agree that there is lack of transparency on key elements of toll determinations.

The process that is currently adopted is consistent with the Interim Report's recommendation that 'any new road should be justified on the basis that the community benefits to be obtained outweigh any associated costs'.<sup>11</sup>

It should also be noted that under the NSW Government's current procurement process, it is mandatory that all new NSW toll roads are subjected to detailed cost-benefit analysis under Treasury Policy Guideline 23-08 *NSW Government Guide to Cost-Benefit Analysis (CBA)*.

CBA 'aims to measure the full impacts of any government decision or action on households, businesses, governments, non-government organisations and natural assets in a specified community...'.<sup>11</sup>

NSW Treasury currently publishes summaries of all concession contracts on its website. Further, Transurban's traffic data is released publicly every quarter, and tolls can be forecast years in advance. Toll road signs are clearly marked and toll prices are widely available on Government, Linkt and E-Toll websites, Google Maps and via digital tools such as Linkt's Trip Compare. We remain advocates for further transparency measures, including decision-point signage, which we believe gives drivers the ability to make more informed choices.

### **2.2.1 Investment partners**

Since Transurban entered the NSW market, several other investors – including leading Australian superannuation funds – have partnered with us to invest in established toll roads as well as development projects (Figure 2). More than 70% of our investors are Australian. In addition, many Australians hold Transurban shares through industry superannuation funds including UniSuper, AustralianSuper and Aware Super.

---

<sup>10</sup> Independent Toll Review Interim Report, page 8

<sup>11</sup> Independent Toll Review Interim Report, page 8

**Figure 2. Toll-road asset ownership in Sydney**

Asset	Investment partnership	Partners and ownership %			
WestConnex	Sydney Transport Partners	Transurban	50%	CDPQ	10%
		AustralianSuper	20.5%	Tawreed	
		CPP Investments	10.5%	Investments Ltd	9%
Eastern Distributor	Airport Motorway	Transurban	75.1%		
		IFM Investors	14.4%		
		UniSuper	10.5%		
Westlink M7 NorthConnex	NorthWestern Roads Group	Transurban	50%		
		CPP Investments	25%		
		QIC Limited	25%		
M5 West <sup>^</sup> M2	Lane Cove Tunnel Cross City Tunnel	N/A		Transurban	100%
				<small><sup>^</sup>M5 West will form part of the WestConnex M5 concession once the current concession expires in December 2026</small>	
Sydney Harbour Bridge Sydney Harbour Tunnel Western Harbour Tunnel* M6 <sup>*</sup>		N/A		NSW Government	100%
					<small>*under construction</small>

Demand-based toll-road PPPs attract capital from global pension funds due to their stable, long-term contracts where revenues grow by CPI or a proxy for real income growth (for example, CPI + 1.0%). The PPP model provides these organisations with the ability to match long-term liabilities in pension funds with steady, long-term revenues.

The benefit of these escalation factors is that they have allowed governments to set toll prices at lower levels in early years than would otherwise be available in the absence of such escalation.

Any reforms that negatively impact toll-road concessionaires will adversely affect the returns of these investors, shareholders and lenders.

The Interim Report notes that the current cost of capital is lower now than when some toll roads were initially established in the 1990s and 2000s.

This simply reflects that cost of capital changes over time depending on factors such as interest rates and inflation. There would also be times where the cost of capital is higher than when the investment was made. Under a PPP model, this risk is borne by the private sector rather than the government.

The fact remains that at the time these assets were put to market, they were competitively bid from a cost of capital perspective given the ability of demand-based PPPs to attract significant investor interest. Private sector involvement also transfers a considerable amount of risk from governments, including higher interest rates. Further, each individual asset has its own complex funding structure (Figure 4) which may involve a combination of bank, capital market and government debt as well as institutional term loans.

These investments have been made in good faith and reflect the confidence of these partners in Sydney's growth and prosperity.

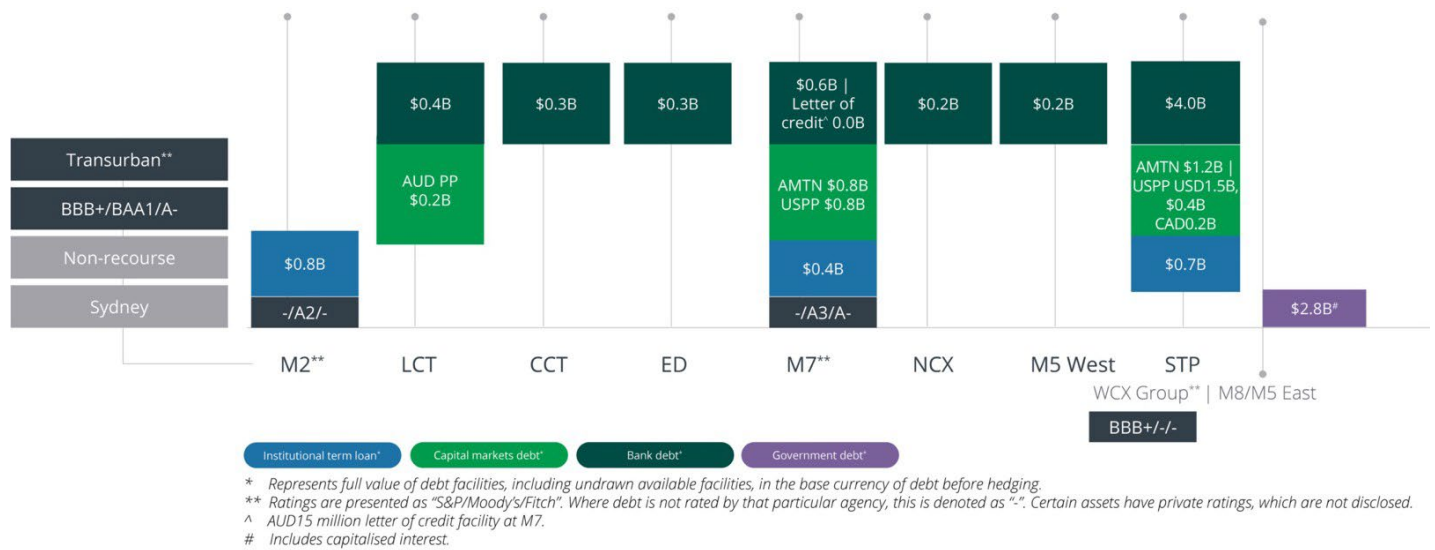
A significant restructure of the Sydney toll-road network, that does not allow investors to realise their investment value according to the investment parameters established at the time of their investment, could undermine the perception of acceptable risk for NSW infrastructure projects in the future.

If the NSW Government were to unilaterally impose changes to investment structures and returns during the term of existing toll-road concessions, it would call into question the state's reputation as a safe and stable region for investment, introducing 'sovereign risk' as a factor for future private infrastructure investment in NSW.

Implementation of the proposed model would also introduce uncertainty and risk for financiers of privately owned toll roads. Changes to tolling arrangements via legislation could trigger events of default and other consequences under the financing arrangements for some concessions, including the possibility of triggering breaches of finance undertakings which could necessitate the immediate repayment of loans.

Uncertainty inherent in the proposed model could also mean that a concessionaire has its credit rating reduced or becomes unable to adequately service its debt arrangements, potentially impacting both the concessionaire's ability to refinance its debt and the terms on which refinancing can be undertaken. To overcome the risk of finance default, the NSW Government may need to guarantee repayment to financiers, exposing the state to significant liability.

**Figure 3. Funding structure (as at 31 December 2023)**



## 2.2.2 Private sector risk

The injection of private sector capital and expertise into major projects has allowed the community to benefit from critical infrastructure without government taking on the risk or financial burden.

There are significant risks inherent in large-scale infrastructure projects and this has resulted in some highly publicised failures. In Sydney for example, the Cross City and Lane Cove tunnels failed to meet patronage forecasts which led to their previous owners' insolvencies.

The COVID-19 pandemic highlighted the risks borne by the private sector in infrastructure projects, with significant impacts on traffic levels due to government-mandated restrictions. In NSW, Transurban bore losses of \$10 to \$12 million per week during some of the most significant restrictions in June 2021.

Transurban did not receive any government relief payments during this time. On the contrary, we carried out extensive customer support during the pandemic, including providing more than \$10 million worth of toll credits to more than 40,000 Australians, plus initiatives to support the vaccine rollout.

We continue to offer toll credits as part of our expanded Linkt Assist program, geared at providing even more support to those who need it most.

When risks materialise, in most cases private investors bear the losses while motorists continue to have access to improved networks and world-class assets. For example, the Warringah Freeway Upgrade is projected to affect traffic volumes on the Lane

Cove Tunnel into 2026. Unlike other forms of economic regulation contemplated by the Interim Report (such as electricity networks), financial returns to investors in demand-based PPPs are not indifferent to the level of patronage or usage achieved.

As such, this drives alignment with government-partner objectives, ensuring that investors are focused on delivering value-for-money outcomes and improved service offering for customers.

Other forms of regulation (including in sectors currently regulated by Independent Pricing and Regulatory Tribunal (IPART)) often compensate asset owners where demand volumes are below forecast. This is achieved through ‘true up’ payment calculations, normally accommodated through price increases to customers to compensate infrastructure investors.

This form of regulation transfers demand risk from infrastructure investors to end-users – the prices they pay will either rise or fall based on actual usage levels achieved. In such regimes investors do not bear the direct consequences of reduced demand as a result of quality of service or value degradation given the demand adjustments made throughout the regulatory process.

In contrast, the demand-based PPP models adopted for toll roads ensure concessionaires – not the ultimate road user or the government – bear the traffic risk.

## **2.3 Competition and regulation**

Transurban’s investment approach considers overall solutions for the community as well as its willingness to accept risk. The traffic data we use for bidding is publicly available and the processes for concessions and acquisitions of existing interests involve regulatory oversight.

Each toll price and escalation rate is set by the government, as it decides how to best fund the project and provide a value-for-money proposition that will be attractive for motorists through travel-time savings and reliability. Tolls do not change according to ownership.

The Interim Report states that Transurban has a position of dominance and enjoys incumbency advantages that have enabled us to have a preferred position in the development, acquisition, and operation of toll-road projects in NSW. We do not consider these comments to be accurate.

### **2.3.1 Transurban’s presence due to innovation and focused investment**

Transurban has a significant presence in NSW which is a function of a series of decisions by governments, and investments we have made in applicable regulatory environments. These investments have often been made in ventures with other parties, with Transurban one of several consortium members (Figure 2). Consortium participants differ across these investments and it is not accurate to treat Transurban as having complete control of all assets in which we hold an interest.

Most of Transurban’s NSW assets have been acquired from the private sector, including the Eastern Distributor, Hills M2, Cross City Tunnel, Lane Cove Tunnel and M5 South West.

Transurban’s interest in Westlink M7 was as part of a winning consortium in a competitive procurement process to deliver and operate the motorway. NorthConnex was developed and delivered by Transurban in partnership with other Westlink M7 investors under the NSW Government’s Unsolicited Proposal Framework. WestConnex was purchased from the NSW Government in a competitive process after tolls had been set and construction had commenced.

As recognised by the Review, Transurban has been an efficient and innovative operator. This comes about not because of our interests in other toll roads but because we are more strategic and focused than our competitors. We do not invest across different asset classes and are very focused on the geographies where we have chosen to operate. This helps us stay responsive to the specific market conditions that apply to toll roads in Australia, including in NSW.



### 2.3.2 Information used is publicly available

In its decision in 2018 not to oppose the Transurban consortium's acquisition of the majority interest in WestConnex,<sup>12</sup> the Australian Competition and Consumer Commission (ACCC) (that independently assesses the competitive impact of any specific acquisition) found the vast majority of traffic data Transurban uses for traffic modelling is available publicly or is not exclusive to Transurban. Rival WestConnex bidders were free to build traffic models of comparable sophistication to Transurban using available expertise and technology.

In that matter, the ACCC accepted from Transurban an enforceable undertaking to ensure that 15-minute-interval toll gantry data for each NSW toll road in which Transurban has an interest is made available.<sup>13</sup> This has further enhanced the detail and timeliness of information available to other investors and operators.

### 2.3.3 New toll road proposals

Competition for toll roads is generally on the merits on each occasion, whether through initial concession proposals or the acquisition of existing road interests. As the Review notes, Transurban's acquisitions have been subject to ACCC review.

Governments make decisions about the most appropriate way to develop toll roads, considering the interests of both consumers and the State. In doing so, the NSW Government takes into account the appropriate level of risk that the State should assume in any particular situation.

The State has significant control over how these processes unfold, how bidders participate and the mechanisms that can and have been put in place to address any concerns about information asymmetry.<sup>14</sup> Long term agreements are often necessary and appropriate in regard to the level of risk assumed by toll road operators over the life of the concession.

---

<sup>12</sup> Independent Toll Review Interim Report, page 81 and 83

<sup>13</sup> This information includes vehicle count, vehicle classification (for example, light vehicle, heavy vehicle) and direction of traffic flow

<sup>14</sup> ACCC, 30 August 2018, Media release: [ACCC will not oppose Transurban consortium WestConnex bid following undertaking](#). Retrieved April 2024

## 3. Impacts of the proposed model

### Summary

- Our preliminary modelling suggests the proposal for declining distance-based tolling, combined with the proposed introduction of two-way tolling on sections of road that are currently tolled in one direction and the removal of toll caps, is likely to result in more users worse off, than benefiting, from a cost of tolls perspective for motorists.
- Our preliminary modelling shows drivers making trips within Western Sydney are particularly worse off under the proposed model (see Figure 6).
- The proposed declining distance-based tolling would create unintended congestion consequences on some arterial roads. The increase in toll prices is likely to create a change in driver behaviour with some trips becoming more expensive and likely to increase congestion on neighbouring arterial roads that are already at capacity.
- Our preliminary modelling estimates Sydney motorists would experience an extra 1.3 million<sup>15</sup> hours of travel time per year under the proposed network tolling model, resulting in material cost to Sydney's economy and productivity.
- Transurban supports restructuring distance-based pricing coupled with infrastructure charges for major tunnel structures. This regime could be coupled with time-of-day pricing with a material discount during off-peak (night and inter-peak) periods. Transurban believes this will deliver better network performance with a fairer and more equitable outcome.
- It is not clear how the Interim Report's proposed revenue adjustment mechanism would adequately compensate existing toll-road concessions over time. The Report gives no indication as to how overall network toll revenue will be shared between toll road owners.
- Establishment of State TollCo as proposed in the Interim Report would add a level of bureaucracy we don't believe would provide meaningful value, and may have unintended consequences for the NSW Government, toll road concessionaires and the banking sector.
- Toll road users would be worse off under the regulatory pricing approach traditionally used by IPART compared to the current model, with average toll prices on WestConnex significantly higher in the first five years compared to the current model.

### 3.1 Network tolling scenarios

The Interim Report includes two toll pricing scenarios – Network Tolling Scenario A (no subsidy) and Network Tolling Scenario B (with subsidy) – for the proposed declining distance-based tolling regime. Network Tolling Scenario B (with subsidy) includes a lower distance rate and discounted infrastructure charges, funded through a NSW Government subsidy.

The Interim Report states that the Government's current spending on toll relief is approximately \$400 million per year, and this spending would be redirected to fund the subsidy for toll prices under Network Tolling Scenario B.

We understand the approximation of \$400 million per year Government spend on toll relief includes:

- the cost of the M5 South-West Cashback scheme
- the two-year trial of a \$60 weekly toll cap for private vehicles
- a partial toll rebate for heavy vehicles using the M8 and M5 East tunnels.

Since publication of the Interim Report, NSW Government has publicly committed to continuing the M5 South-West cashback scheme, meaning the value of any subsidy of network tolling prices would be diminished or result in greater cost to Government.

---

<sup>15</sup> Preliminary estimate based on Transurban internal traffic modelling

Transurban has not undertaken any modelling of Network Tolling Scenario B (with subsidy) given uncertainty around the amount of Government funding available for the subsidy and the sustainability of this regime in the long-term. All modelling and analysis in this submission refers to Network Tolling Scenario A.

We note that the concept of using Government funding to subsidise toll pricing is not unique to the proposed network tolling regime and, if acceptable to Government, could be implemented alongside any alternative tolling regime (including, for example, existing toll prices). It may also be more appropriate for the NSW Government to use these funds for targeted toll relief to improve equity of any tolling reform outcome.

## **3.2 Impacts**

### **3.2.1 Toll pricing impacts**

We question the ability of the proposed tolling solution to improve the fairness of toll pricing for motorists. Combined with the proposed introduction of additional tolls on currently untolled sections of the harbour crossings and the Eastern Distributor, and the removal of toll caps, the proposed declining distance-based tolling solution may in fact see more motorists who would be worse off than those who would be better off in parts of Sydney, based on road-user journey costs.

Implementation would also be challenging given the cost of installing extensive new roadside tolling infrastructure and upgrading back-office systems. We expect at least 50 new tolling gantries would be required to be installed. The Review should consider the cost and timing implications associated with planning, environmental, construction and traffic management requirements.

The report's own findings (Interim Report Figure 9.6)<sup>16</sup> shows at least 40% of Class A trips would be worse off under the new Network Tolling Scenario A model, with users paying higher toll prices compared to the existing pricing regime.

However, the Interim Report's data includes a category of 'no change' trips, which we understand to be predominantly trips on roads that are untolled under the status quo and untolled under the network tolling scenario. Given drivers aren't currently paying for these 'no change' trips, it is reasonable to exclude them from the analysis. This brings the total proportion of toll-road users adversely impacted by the proposed changes to approximately 57%.

**Figure 4. 2026 network tolling vs status quo (Scenario A)<sup>17,18</sup>**

<b>Trip distance</b>	<b>\$3+ lower</b>	<b>\$1-3 lower</b>	<b>\$0-1 lower</b>	<b>No change</b>	<b>\$0-1 higher</b>	<b>\$1-3 higher</b>	<b>\$3+higher</b>	<b>Total</b>
<10 km	2%	6%	5%	27%	9%	5%	11%	64%
10-25 km	2%	5%	3%	4%	4%	5%	3%	26%
>25 km	2%	2%	3%	0%	1%	2%	1%	11%
<b>All trips</b>	<b>6%</b>	<b>13%</b>	<b>11%</b>	<b>30%</b>	<b>13%</b>	<b>12%</b>	<b>15%</b>	<b>100%</b>

Declining distance-based tolling will reduce transparency for motorists, as the proposed model doesn't give clarity about exact trip costs and different prices could apply to different drivers travelling on the same road, depending on their individual journey lengths.

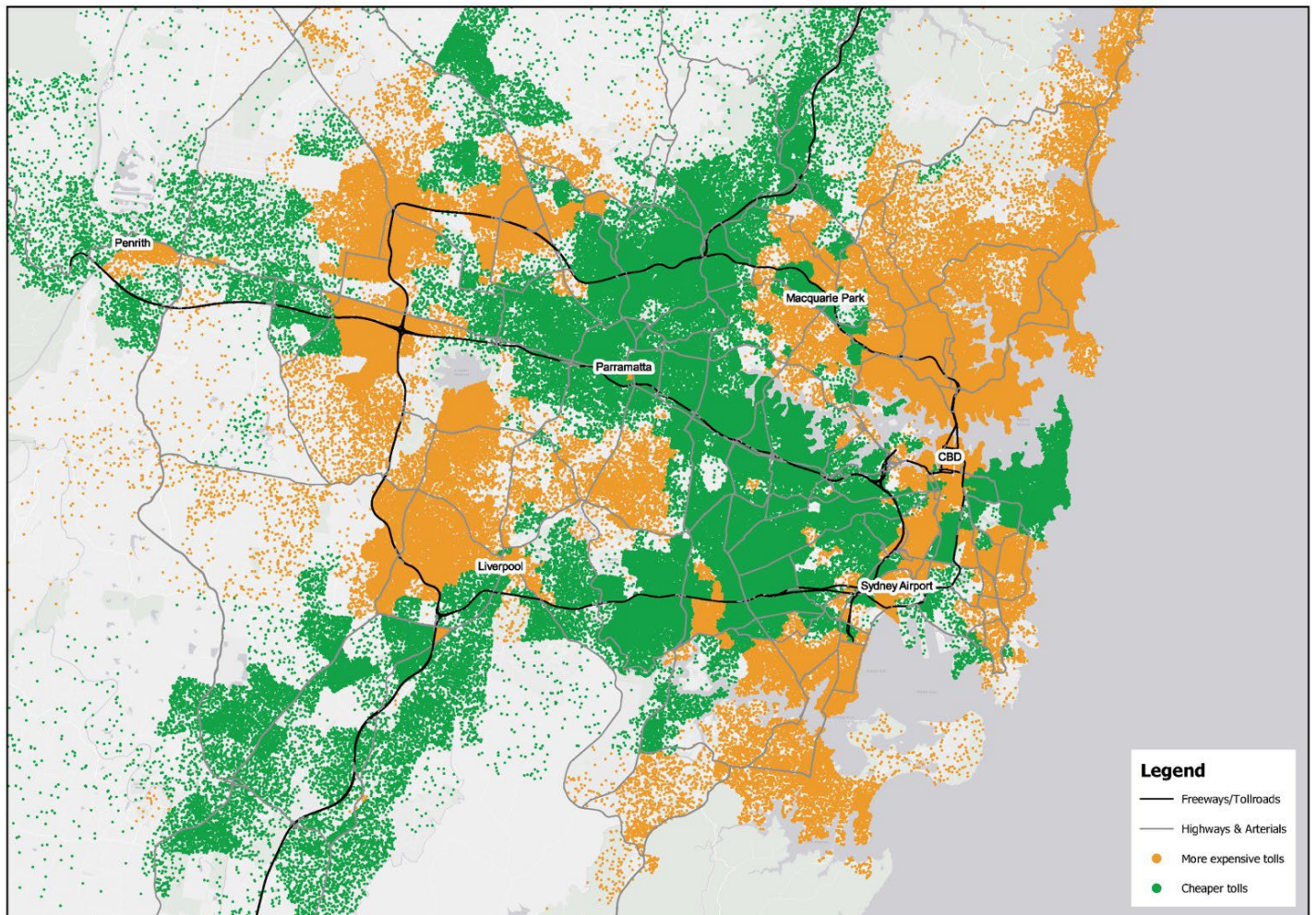
As the Interim Report outlines, the proposed network tolling model is estimated to have a mix of motorist toll-price winners and those who would be worse off. Our model of the geographic spread of those who would benefit and those who would be worse off is shown in Figure 5. It is evident that there are areas of the city where users are likely to benefit more significantly than those who are likely to be worse off and vice versa. Motorists in the M1 corridor from Sutherland to Chatswood and the Northern Beaches would be worse off, particularly as they are strong users of the harbour crossings and Eastern Distributor. Motorists in the Westlink M7 corridor would also be more likely to be worse off, including in Rooty Hill, Marsden Park and Mt Druitt.

Motorists in the M2, M4 and M5 corridors would be more likely to be better off under the Network Tolling Scenario A from a toll pricing perspective – however, they would also be likely to experience higher congestion and travel-time delays. Motorists from the eastern suburbs, including Point Piper, Bondi, Dover Heights, and Vaucluse, would also benefit from lower tolls.

<sup>17</sup> Independent Toll Review Interim Report, page 17, Figure 2: Class A, Toll Price Difference, Network Tolling A compared to Status Quo, 2026

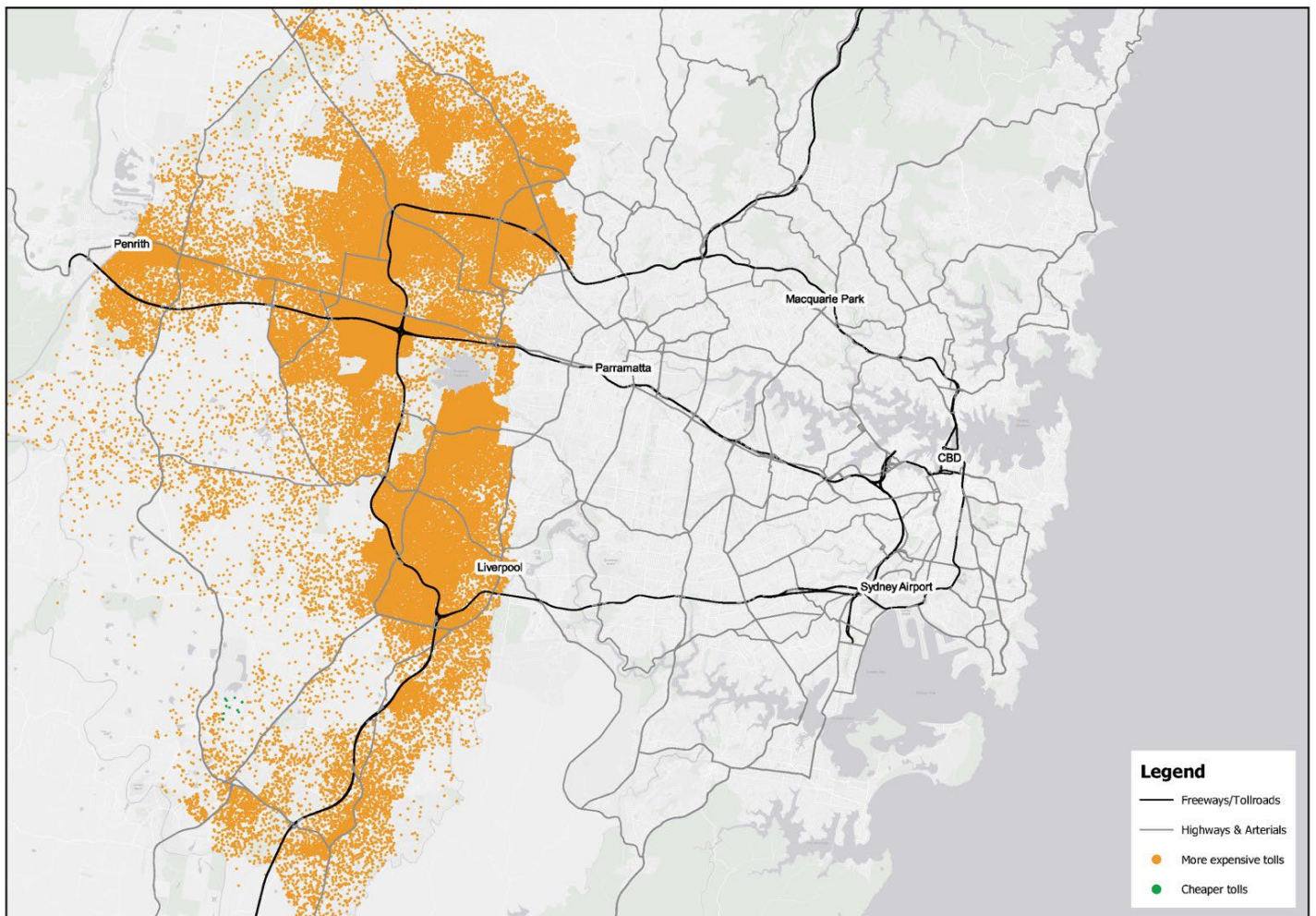
<sup>18</sup> Figures may not add up to the total displayed due to rounding

**Figure 5. Net impact on cost of tolls for trips within metropolitan area (Class A, average weekday)<sup>19</sup>**



Motorists travelling within Western Sydney are particularly worse off under the proposed model (Figure 6), including motorists from Marsden Park, Rooty Hill and Mount Druitt. Motorists making short journeys on Westlink M7 would be disadvantaged at a distance rate of 65c per kilometre compared to the existing 48.8c per kilometre rate. For a four-kilometre trip anywhere along the M7 corridor (for example, Sunnyholt Road to Quakers Hill Parkway), this would equate to a 33% increase in toll cost under the proposed model. Similarly, long journeys on the M7 would be disadvantaged due to the removal of the existing toll cap. For an end-to-end journey on the M7, the cost would increase more than 40% from \$9.76 to \$13.92.

**Figure 6. Net impact on cost of tolls for trips within Western Sydney – cost of tolls (Class A, average weekday)<sup>20</sup>**



### 3.2.2 Congestion impacts

The proposed declining distance-based tolling would also likely create unintended congestion on arterial roads due to trip diversion. Our preliminary modelling of Network Tolling Scenario A for the AM peak period suggests the increase in toll prices for some trips would be likely to deter motorists from using some toll roads. This would increase congestion on arterial roads that are already at capacity, including:

- Victoria Road–Anzac Bridge including Rozelle Interchange (Rozelle)
- King Georges Road (Strathfield to Hurstville)
- Botany Road–O’Riordan Street (Alexandria).

While the M4-M8 Link has successfully removed traffic from the arterial network – largely due to the toll cap that applies under the current WestConnex tolling regime – the Interim Report proposes the removal of this cap, increasing the cost of longer distance trips using WestConnex. Our modelling shows this would result in greater demand on the A3 corridor, including King Georges Road. Congestion on local roads around Rozelle Interchange would also likely be exacerbated.

As outlined above, users of toll roads in Western Sydney would likely experience disproportionate adverse cost-of-toll outcomes under the proposed model. Our preliminary modelling shows the increase in toll prices under the proposed approach would create a change in driver behaviour. For example, the increase in prices on the Westlink M7 would lead to diversion impacts, likely resulting in more traffic on already congested arterial roads such as the Cumberland Highway.

Overall, our preliminary modelling indicates that Sydney motorists may experience an additional 1.3 million hours<sup>21</sup> of travel time per year as a result of the proposed tolling approach.

### **3.2.3 Potential alternative solutions**

Transurban remains willing to consider a network-wide approach to pricing, as outlined in the adjacent section, and will work collaboratively with Government to deliver its priorities, including efficient network performance and being equitable and fair to motorists. Solutions may vary in different corridors to better achieve these objectives and may include, for example, identifying value sources in existing agreements that could be put towards toll reform, relief such as rebates, or other initiatives to improve the motorist experience.

It is important to recognise the interests of other toll-road investors, as each will have its own interests to address. While competition law prohibits competitors agreeing on prices for products that compete with one another, there are options for addressing this issue. Transurban's interest across toll roads could facilitate engagement without leading to the concerns expressed in the Interim Report regarding delays to the process.

All NSW toll road partners have signed a letter committing to work with Government on reform. A copy of this letter has been separately submitted to the Review and provided to the NSW Government.

These partners have a track record of variously working together and with Government, within existing regulatory frameworks and respecting contractual arrangements, to achieve outcomes for motorists and the people of NSW.

As outlined earlier in this submission, a legislative-change pathway would be expensive and could create a major risk exposure for Government and a sub-optimal outcome that could itself be protracted, rather than achieving reform.

We continue to look for ways to create more value for motorists, approaching our business through a customer lens to deliver real and clear value on and off the road.

---

<sup>21</sup> Preliminary estimate based on Transurban internal traffic modelling

## Changes to tolling regimes

We are open to finding alternative pricing regimes that are simpler, more equitable and achieve more efficient network performance. This may include a range of measures such as distance-based rates, with infrastructure charges for major tunnel structures. This regime could be coupled with time-of-day pricing, with a material discount during off-peak (night and inter-peak) periods, noting solutions may vary in different corridors to better achieve these objectives.

Independent research by Bastion Insights (commissioned by Transurban) found that toll road drivers are more likely (61%) to feel supportive of a peak/off-peak pricing model. This approach is perceived to be fairer, with 57% finding peak/off-peak fairer than current pricing practices.

We recommend the proposed solution be implemented in phases, with a primary focus on achieving equity, fairness and efficiency for key corridors servicing Western Sydney. This can be implemented at a lower cost, with less extensive requirements for new tolling infrastructure and system upgrades. It would also be far simpler for motorists to understand when compared with the declining distance-based regime the Interim Report proposes. Any such solution would require liaison with – and the support of – our partners.

## Government-administered rebates

Transurban suggests IPART could play an important role overseeing rebates administered by the NSW Government. IPART could set a minimum rebate and cap amount that the government of the day could implement, providing a simple and fair rebate system that benefits drivers and also considers network performance.

We do not consider IPART regulation of toll prices to be a feasible option, as detailed in sections 3.3 and 3.4, however there could be benefit in IPART's involvement in setting and reviewing the appropriate quantum and parameters for Government-administered rebates to address cost of living concerns for NSW residents.

Following the announcement of the Government's \$60 weekly toll cap, Transurban committed to the State to share any upside with customers and through community initiatives.

### 3.2.4 Vehicle classification and multipliers

In our submission to the Review in July 2023, Transurban highlighted that large-vehicle multipliers are in place to reflect the extra construction costs and impacts heavy vehicles have on road infrastructure. We also noted that while large-vehicle multiplier prices are not designed to incentivise more productive vehicle use, given operators pay the same heavy-vehicle multiplier when using larger, more productive vehicles, this pricing structure may deliver this outcome. Hence, the Interim Report proposal to introduce a mid-class heavy vehicle classification could potentially disincentivise use of more productive vehicles.

The Interim Report also recommends introducing a separate motorcycle class. The report acknowledges administrative challenges in implementing additional vehicle classes and identifies the potential need for licence plate lookups to implement these changes.

We suggest further consideration be given to the benefits and costs of this recommendation, including revenue impacts, risks of higher leakage (due to the additional complexity) and the cost of tolling equipment and system upgrade costs.



### **3.3 Proposed role of IPART – cost of tolls**

The Interim Report recommends IPART be responsible for the regular review and independent oversight of toll prices.

At a high level, regulatory pricing models set prices at regular intervals (commonly five years) such that expected revenues equal expected costs. In our view, the setting of toll prices under an IPART-regulated regime such as this would not necessarily reduce toll prices on Sydney toll roads. Our understanding from the Interim Report is that the impact of adopting such a regulatory regime could increase average toll prices significantly in the earlier years of a toll road, when lower traffic volumes are typically seen.

Ultimately, our preliminary modelling suggests toll-road users would be worse off under the regulatory pricing approach traditionally used by IPART, when compared to the current model. For example, average toll prices on WestConnex could be significantly higher in the first five years of operation compared to the current model.

It is important to note the Interim Report has not provided any clarity on IPART's specific approach. This will be vital information for us and our stakeholders to consider.

Under the current model – with toll prices set by the NSW State Government in concession deeds with toll road operators – Sydney toll-road costs are clear for motorists. This model also gives motorists certainty and transparency about toll price increases, which are routinely published and built into tools on our Linkt website. For example, our Trip Compare tool helps drivers make informed decisions about whether using a toll road or an alternative route is the best choice for them.

In comparison, there is no detail in the proposed IPART model about future toll price certainty.

### **3.4 Proposed role of IPART – impacts on concessionaires and investors**

Transurban's average concession length is almost 30 years. The contracts we have in place with Government to operate roads for these periods of time (including toll prices) are a key part of Transurban's business and investment proposition. Investors have invested in Transurban, and our partners have financed and contributed to our roads alongside us, based on this investment proposition. Without clarity on what toll prices would be in the future, our investors and partners (including superannuation funds such as AustralianSuper and UniSuper) will have less certainty and confidence around their investment in our roads.

Information on how this regime would work in practice – such as the exact basis for estimating revenue for toll road operators, and how the State would fund any shortfall or compensation owing to concessionaires – has not been detailed in the Interim Report. There is a risk that this approach does not adequately compensate or 'keep whole' the concessionaires over time.

The Interim Report gives no indication as to how the overall network toll revenue would be shared between concessionaires in future years or how that could be expected to result in comparable returns for each concessionaire.

### **3.5 Proposed role of State TollCo**

We agree with the Interim Report's own finding that in the process of undertaking reform, existing contracts should be honoured.

The Interim Report's proposal for a unified, network-wide price structure and a state-owned tolling entity – State TollCo – would add a level of bureaucracy we don't believe would provide meaningful value.

The report provides limited detail on State TollCo's operations and the proposed revenue adjustment mechanism. Our view is the Interim Report's recommendations are likely to be challenging to implement with no assurance that parties would be adequately compensated for the proposed changes to toll prices.

Further details on this proposal are needed, including:

- how the regime would work in practice, particularly how whole-of-concession-life toll revenue would be determined for concessionaires to enable establishment of baseline revenue profiles or estimates
- how the baseline revenue estimates would be updated: for example, would there be quarterly updates for changes in population growth and CPI to accurately represent what would have otherwise been achieved by concessions
- how shortfalls in network revenue owed to concessionaires would be funded by the State
- what avenues the various concessionaires and their financiers and equity investors would have to appeal revenue adjustment estimates if they believed a concessionaire had been unfairly compensated following implementation of State TollCo's revised toll pricing.

The Interim Report also raises questions about State TollCo's potential blended role as regulator, retailer and operator, where State TollCo could be responsible for both setting tolls and adjusting revenue between concessionaires – acknowledging that 'there is the potential for conflicts of interest if State TollCo was both the network toll setter as well as the operator of some toll roads'.<sup>22</sup>

The impact of potential negative tax consequences for the NSW Government, State TollCo and concessionaires because of proposed changes to the way tolls are determined and State TollCo's roles in setting tolls and redistributing revenues should also be considered. There may be material tax and stamp duty imposts triggered by any changes to the operation of concession agreements and the proposed role State TollCo is to play. We expect that these material tax and stamp duty imposts would be considered in any calculation of 'revenue neutrality' or compensation for concessionaires.

---

<sup>22</sup> Independent Toll Review Interim Report, page 149

## 4. Administration improvements

### Summary

- We welcome the Interim Report's recommendation to improve the availability of decision-making information, and strongly support making toll-pricing information easy to access and understand.
- Transurban has led the way on transparency initiatives for many years and Transurban's retailer, Linkt, provides offerings not available through any other outlets.
- Transurban supports modernisation and simplification of the toll compliance process to improve customer experience and outcomes for motorists.
- Transurban has been an advocate for improvements to roadside signage for some time and would welcome its introduction where appropriate.
- The Interim Report's proposal for declining distance-based tolling would not make price transparency any simpler to understand or communicate, with different costs per kilometre applying to motorists depending on their origin and destination.

### 4.1 Customer experience

On average, one million trips are made on our Sydney roads every day and we know the main reasons people choose to take toll roads are to access faster, safer and more sustainable travel.

Our priority is to make using our roads as simple and as seamless as possible – whether motorists are planning a trip, travelling on our roads or managing their Linkt account.

Transurban roads are some of the safest in Australia due to high-quality road design, focused and proactive motorway operations that are supported by advanced technologies, and our ongoing investment in maintenance, innovation and safety initiatives.

An example of this investment is our WestConnex Motorway Control Centre at St Peters, which is now Australia's largest control centre, with 60 large screens giving oversight of the entire 33-kilometre WestConnex network, including its 22 kilometres of tunnels. The screens show real-time footage from the hundreds of CCTV cameras along each part of WestConnex, helping us respond to incidents quickly and keep traffic moving.

Our Voice of Customer program analyses around 260,000 pieces of feedback from our Australian customers each year, providing us with comprehensive metrics to gauge customers' experience both on and off the road. This feedback also helps us shape how we design and deliver existing and new experiences across app, website and phone interactions.

As the Interim Report notes in Figure 6.2 (*Existing platform features and functionality*),<sup>23</sup> Linkt offers many benefits beyond what E-Toll account holders can access, including an app, trip planner and more extensive trip data for customers.

Further, our Linkt Rewards program offers discounts that can help lower the cost of travel. For example, our latest fuel offering provides eligible Linkt customers with a monthly 12 cents per litre fuel discount<sup>24</sup> for three months, which can be boosted further in combination with other eligible offers, delivering savings of up to 26 cents per litre.<sup>25</sup> Our customers have saved more than \$8 million on fuel since the Linkt Rewards program launched in 2019.

---

<sup>23</sup> Independent Toll Review Interim Report, page 88

<sup>24</sup> Terms and conditions apply. Visit <https://www.linkt.com.au/using-toll-roads/news/bonus-fuel-savings-up-for-grabs> for more details

<sup>25</sup> Terms and conditions apply. Visit <https://www.linkt.com.au/using-toll-roads/news/bonus-fuel-savings-up-for-grabs> for more details

We've received positive feedback from our customers about this program, and we continue to expand it, adding discounts on car hire, car servicing and accommodation. We've also improved the experience for customers in the Linkt app, making it easier to view and claim rewards.

## **4.2 Pricing and toll rebates**

The Interim Report states that 'concessionaires benefit significantly from any extra traffic generated by relief measures but have no requirement to repay this benefit to government'.

As outlined in our previous submission, revenue-sharing provisions are in place with the government on all concessions, which provide the government with adequate protection to ensure it and the community receive upside from revenue that is above expectations.

Should toll revenue outperform over time, our assets' contracts currently include provisions to share revenue with the government. For example, because of the Westlink M7 motorway's performance, \$174 million was raised in 2015 for the Government, which it used to build new infrastructure.

Transurban has not identified any significant traffic uplift due to toll relief schemes.

While rebate schemes are a policy matter for government, Transurban carried out research to understand their perception, impact on communities and whether they would help improve fairness, including in relation to the \$60 weekly toll cap scheme that began on 1 January 2024.

Independent research by Bastion Insights (commissioned by Transurban) demonstrates that toll rebates and cashbacks are seen as beneficial. This research found 95% of those who claimed the \$60 weekly cap feel it has made a real difference to them financially, while 87% feel these initiatives increase the fairness of toll-road costs.

## **4.3 Transparency**

Transurban strongly supports making toll-pricing information easy to access and understand, and empowering customers to make informed decisions.

We are continuously improving the customer experience, and many of the suggestions outlined in Figure 6.1 (*Toll Price Transparency Framework*) of the Interim Report<sup>26</sup> are already in place for Linkt customers.

For example, transparency initiatives such as our Linkt Trip Compare tool, and our partnerships with Google and Waze to implement real-time trip price estimates for toll-road travel, help motorists to plan their route with a full understanding of toll costs and indicative journey times.

Along with these tools, the Linkt website also includes current toll pricing for all NSW roads, and an explainer of toll-price escalations for each road. Upcoming toll price adjustments for our Sydney roads are published online at least one week in advance, before being subsequently reflected on road signage.

Historical toll-road usage data is also available to Linkt customers when they log in securely to the Linkt website or app, providing customers with visibility of the cost of toll-road travel and the ability to calculate likely future spend based on their travel patterns. We are supportive of measures to improve customers' ability to make informed decisions about their journey and we agree that decision-point signage could provide customers with even more data to inform their travel choices when using the motorway network.

Transurban has run a decision-point signage pilot in the past and shared the pilot's findings with Government.

A range of factors go into a driver's decision to take a tolled route over a free route, including travel time and pricing.

While live travel times are relatively simple to display, we note that a switch to declining distance-based tolling would not make price transparency any easier to communicate, with different costs per kilometre applying to different motorists, depending on their origin and destination.

Any on-road toll pricing should be designed with road safety front of mind, and we welcome the opportunity to discuss potential solutions.

#### **4.4 Toll notice improvements**

Transurban has long advocated for toll notice reform in NSW and we welcome further discussion about opportunities to consolidate toll notices, so a customer only receives one toll notice for three days of travel across the Sydney network. This change would be fairer for users, reduce the confusion that comes with receiving multiple toll notices and bring NSW into line with Victoria and Queensland's toll notice processes.

We also support the Interim Report's suggestion to digitise toll notices. Post is currently mandated as the communications channel for toll notices, despite email being a faster and more efficient alternative for many people. Digitising toll notices would not only save millions of paper letters going out each year, but would also increase ease of use for motorists, who could quickly and easily respond via mobile phone, tablet or desktop computer.

NSW customers currently have the unique (as compared to other states) option to significantly discount their fees by transferring their toll notice debt over to a retail account (known as a Manual Debit Transfer). However, data shows that many customers with suspended accounts take advantage of this fee discount and top up their overdrawn accounts only once they receive a toll notice, rather than keeping their account up to date. This means that toll-road operators absorb much of the administrative cost of issuing toll notices.

Further, while Transurban is supportive of reductions to administration fees, the current toll compliance regime limits the extent to which this is achievable. NSW has the highest rate of non-arranged toll road travel in the country, and while many motorists do the right thing and pay after receiving a toll notice, they are ultimately subsidising serial toll avoiders who generate the bulk of the administrative burden.

Transurban supports modernisation and simplification of the toll compliance process to improve customer experience, and drive cost efficiencies. These efficiencies could ultimately be put towards reducing administration fees and improving outcomes for motorists.

We note the Interim Report's proposal to increase the threshold for a penalty notice and its suggestion that the current approach is 'too heavy handed'.<sup>27</sup> Transurban does not share this view, as, under the current regime a motorist would need to ignore on-road signage, two posted toll notices over 60 days and further attempts made to contact them through email or SMS (if contact details are available) before potentially receiving a penalty notice.

Transurban is supportive of reform that would provide customers with more opportunities to pay before receiving a penalty notice. This could include additional touch points through trip notifications or toll notice reminders, and more channels for customer contact (such as email). However, the introduction of an arbitrary dollar value threshold for a penalty notice would only act to encourage and reward existing serial toll avoiders and increase the administrative burden of the toll compliance system.

Our preference is for motorists to avoid fees whenever reasonably possible, and because we understand that many people make the innocent mistake of travelling on a toll road without a valid arrangement in place, fees are typically waived for first-time offenders who contact Linkt about a toll notice.

Our Linkt Assist team is available to support motorists who are legitimately struggling with toll debt. Available support can include more time to pay for toll-road travel, ongoing payment plans and advising Government enforcement groups and other toll-road operators of a person's situation (with their consent).



# Have Your Say Responses

## Public Submissions



# Throughput rather than congestion

## Submission author

Harry [REDACTED] I am a transport consultant based in Melbourne. This is a private submission.

I am the author of the [REDACTED] which is being published in episodes.

## Background

This submission is supportive of the Interim Report.

This document provides a critique of the discussion of ‘congestion’ in the Report with the aim of helping the Review sharpen and strengthen its case.

The Report makes the case that it is possible and desirable to reduce congestion through revised pricing.

The revised pricing approach would consider activity across the road network rather than ‘per toll road’ and ‘provide levers to respond to’ congestion. Under this regime, fees would ‘fluctuate during the day’ and provide undistorted price signals to users ‘to influence how customers [drivers] use the network’ ‘optimising traffic volume and operating speeds’ across the network.

The Report argues that this approach would get more out of the ‘under-utilised’ toll roads and reduce the stress on other roads.

The approach outlined in the Report is sound and has been demonstrated to be effective. Where it has been applied, it has gained sufficient public consent to remain in use.

One reason we can be certain that this approach is sound and effective is because a similar approach is widely used in the domain of electricity. To prevent the limited capability of the electricity system from being overwhelmed, electricity systems charge what they call time-of-use prices.

This proven approach is not normative in transport. Nor is there a strong consensus that supports its introduction.

There are many reasons why a generic approach to capacity management that has become normative in electricity has failed to cross-pollinate into the domain of transport.

Two of the factors that act to prevent or delay adoption of the approach recommended in the Report are the ambiguity around the concepts of congestion and price. To some extent, these two inhibiting factors are present in the Draft Report.

The discussion below concentrates on the concept of congestion seeking to reveal how the Review can eliminate ambiguities that arise when the word congestion is used. By eliminating these ambiguities, the Review can increase the force of the recommendations and make it more likely that the recommendations will be adopted.

## Congestion

The term ‘congestion’ is a useful colloquial description of a state or situation where one quantity is ‘too much’ for another quantity.

This term is in common use in transport and medicine. In other domains the same state is described by other words such as clog, crash, bottleneck, ramp, trip. In electricity, when too many users demand more of the system than can be provided, the outcome is described as a blackout or brownout.

Though useful in conversation, use of the term congestion is best minimised in analysis, evaluation, policy, fee setting and public debate because it is ‘uncountable’ and because it describes the symptoms not the cause or underlying problem.

## Throughput

In road transport, the shorthand term ‘congestion’ refers to the consequences that arise when the number of vehicles entering a road is greater than the link can handle.

Because the problem is a quantity or numbers problem, the uncountable term congestion is not adequate to diagnose, treat or discuss this circumstance and must be replaced by a countable noun.

The fundamental countable measure for road transport is throughput. This is usually expressed in vehicles per hour. This measure must be the focus of investigation and discussion.

Each road segment (or sequence of segments) has a maximum throughput. This number can be determined objectively through observation (and will vary from site to site).

One maximum throughput on the Sydney network was reported recently in the SMH, when a road manager said the Anzac Bridge can carry 650 vehicles in an hour.

With this information we can say that when more than 650 vehicles/hour attempt to cross the Anzac Bridge, there will be congestion.

Maximum throughput provides the benchmark needed for analysis, evaluation, policy, fee setting and public debate.

The Report does not discuss throughput. Nor does it state the fundamental importance of maximum throughput.

It is likely that maximum throughput is known for all key segments and bottlenecks on the Sydney network. These data could be requested and published by the Review.

## Throughput & speed

Another objectively measurable factor related to congestion is speed.

Unfortunately, there is a widespread view that falling speeds are a reliable indicator that maximum throughput has been exceeded and that there is ‘congestion’.

This is not true because the relationship between throughput and speed is not linear.

Falling speeds (and increased travel times) can signal that the link is overloaded, but they can also be a sign of increased performance (throughput).

In the early morning, as the peak approaches, falling speeds signal an increase in throughput. At 02:00 for example, when the roads are lightly used, speed is high, and throughput is low. As the peak approaches, speeds fall, the gaps between the vehicles shrink, and throughput per hour rises. Here falling speed is a positive sign, not a sign of congestion.

If the number of vehicles entering the link continues to rise, the point of maximum throughput will be reached and then breached. From this point, any additional vehicles will further slow speeds and reduce throughput. Here falling speed is a sign that the road is over-loaded.

The non-linear relationship between speed and throughput is described in charts like those attached below from Washington State and Singapore.

Because falling speeds can be both positive and negative, any discussion of speed on the network must be based on the point of maximum throughput.

It is possible to objectively determine the speed at which maximum throughput occurs. When speeds fall below this point, then we can be sure the road has entered a state of congestion where throughput and speeds are sub-optimal.

(The moment when a road slows to and then below the tipping point speed, is not unlike what occurs to an aeroplane that slows down to stalling speed.)

Once determined, the speed observed at the tipping point can then be used by road managers and in public discussion.

Singapore found that in general on their expressways maximum throughput occurred when traffic speeds were 47kmh. Washington State found their roads tipped into low throughput at a higher speed. (These two speed/throughput curves are provided below.)

The Singapore road manager knows that all reductions in speed from higher speeds to 47kmh indicate rising throughput. But all reductions in speed below 47kmh indicate falling throughput.

In Singapore it is the tipping point speed that determines the fees at the gantry. If speeds are persistently higher, then the fee is reduced. Where and when the speeds fall below the mark, the fees are increased to moderate the load and restore optimum throughput.

### **Throughput and speed in the Report**

The Report does not note the difference between beneficial falling speeds and dysfunctional falling speeds. Instead, it talks of a 'desirable speed' as if the critical speed were a matter of judgement rather than measurement.

The Report provides and discusses traffic speed maps. 'Traffic speed maps indicate areas with slow moving or standstill traffic compared to potential speeds during free-flowing conditions, and highlights congestion.'

However, this speed information is of little value as the tipping point speeds are not known.

The section in the Report on Singapore's fee setting describes what Singapore does but does not explain why they do it. Singapore manages speed through fee adjustments because they want to ensure that they get maximum use (throughput/hour) out of their roads.

### **Lost throughput**

Once the tipping point of throughput and the associated speed are known, the roads can then be managed for maximum throughput – what the Report calls utilisation.

The situation described by the Report is one of underperformance or lost throughput.

It appears that in Sydney during the peak, the network is not generating maximum throughput.

There seem to be two causes of this underperformance.

On the toll roads speeds are high enough during the peak to suggest that throughput is being lost through under-load. As the Report notes, the likely cause is the fees. It appears that the fees required by the shareholders in the tollway are high enough to reduce throughput to a level below optimum.

On the un-tolled motorways throughput is being lost (it appears) because the load is above the level that the roads can handle.

In both cases the quantity of lost throughput can be determined by volume and by proportion.

It may be that these losses are trivial. But this is unlikely. It is more likely that the road network is carrying thousands fewer vehicles than it could, and system throughput is below optimum by a goodly proportion.

Once the scale of the lost throughput is known, then measures can be taken to recover the throughput that these expensive roads were built to deliver. Obviously the greater the loss, the greater the effort that can and should be made.

### **Recovering lost throughput on tollways**

To recover the lost throughput on the tollways, it will be necessary to lower the user fee.

No one can know by how much the tollway fees must be reduced to recover the lost throughput. But there will be a fee that optimises throughput. We can call this the optimal fee.

When actual throughput and maximum throughput is known, the optimal fee can be 'found' in each location by progressively reducing the charge (to increase throughput) until the optimum throughput/speed is reached.

The new throughput can be compared numerically to the previous performance.

### **The cost of optimum throughput**

As the Report points out, optimal throughput (lower fees and more vehicles) may generate less revenue than the toll operator currently receives.

This can be addressed transparently by reimbursing the toll operator for any shortfall in revenue. No payment would be made if revenue was unaltered. The pricing authority would retain any increase under the new arrangement.

The additional vehicles carried on the system can be considered the public ‘dividend’ derived from any payment to the tollway operator.

The cost of each additional vehicle can be calculated. This would allow an assessment of the cost and benefit of this approach. In some places at some times, the additional throughput might have a high cost per vehicle, in others the additional throughput might be achieved without any additional payment.

### **Recovering lost throughput on un-tolled motorways**

To recover the lost throughput on currently un-tolled motorways, it will be necessary to introduce a fee during the hours when currently the load exceeds the capability of the link or sequence of links.

The need to introduce a fee can be established by reporting the maximum throughput and the current throughput to highlight the shortfall. People could be told, for example that the Anzac Bridge instead of carrying 650 vehicles in a peak hour is only carrying 400 – or whatever the actual quantity is.

The Washington State DOT explanation of a similar situation is attached below.

A ‘time-of-use’ fee could then be trialled starting in one location on one day of the week for a period of three to six months.

No one can know how high the fee will need to be in each location (or at each pinch point) to recover the lost throughput. Experience elsewhere suggests that a trivial fee of \$1 – 3 would be effective.

In these cases, the fee would need to creep up until it reached the optimum level. Starting perhaps at \$1 and being reviewed each month.

The necessity of conducting the fee setting and adjustment through a public and transparent process cannot be overstated.

After some time and some adjustments, the optimal fee that restores throughput at peak times will be found.

When people have confidence in the process, it can be extended across the week and across the network as necessary.

### **Network pricing**

The Report puts forward the concept of network pricing.

This is a useful concept if it refers to a consistent approach across the network in pursuit of a measurable aim – optimising throughput through time-of-use prices for example.

To achieve that it will be necessary to ‘tailor’ the fees to the hours, days, and locations across the network. Under this type of network pricing, fees will vary greatly from place to place and hour to hour.

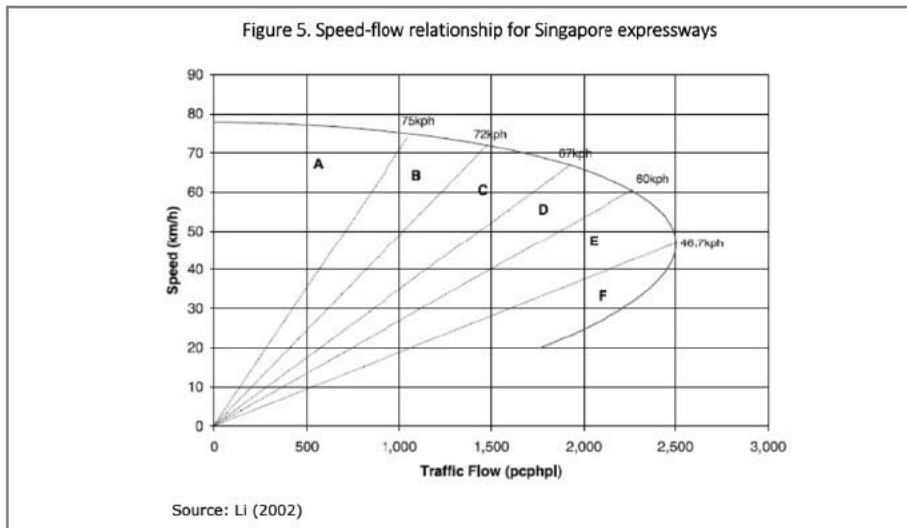
A chart of Singapore’s fees for a recent period is attached.

If network pricing means the same fee applied across the network, that is another matter. A single fee could be applied across all roads (this is done in some cities) but this approach cannot optimise throughput. We can be certain that a single fee across the network will lead to the same situation the network is in today – a situation in which in some places the fees are too high and some places where they are too low which, in both places, will ensure sub-optimal throughput.

## Throughput and speed charts

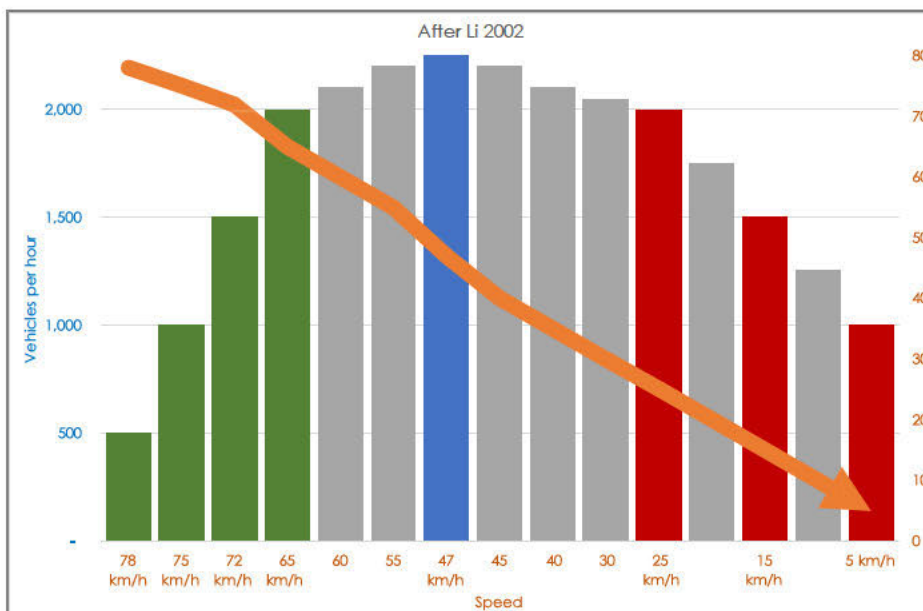
Li's chart below shows the tipping point on Singapore expressways.

- The point is reached when throughput is 2,500 vehicles per hour and the flow speed is 47kmh.
- Above the tipping point the expressways can run with a throughput of 2,000 v/h at 65kmh.
- Below the tipping point throughput of 2,000 v/h is achieved at a flow speed of 25kmh.
- Optimum throughput is somewhere above 2,000 v/h and below 2,500 v/h



The chart below is based on the one above.

- The orange arrow shows speed falling. Initially speeds fall and throughput rises from 500 v/h to 2,500. At the tipping point the flow speed is 47kmh.
- Throughput (and speed) then fall to 1,000 v/h at a flow speed of 5kmh.

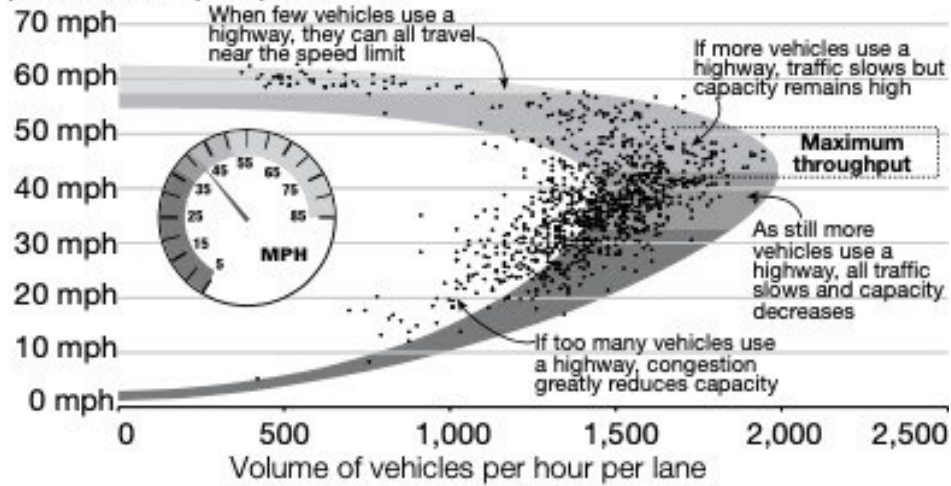


The chart below is from Washington State Department of Transport.

- It shows how speed/throughput 'curves' emerge from a scatter plot of raw data.
- These highways have maximum throughput of 2,000 v/h at 70kmh.

## Understanding maximum throughput: An adaptation of the speed/volume curve

Sample weekday volume 6-10 a.m.; I-405 NB at 24th NE;  
Maximum throughput speed ranges between 70% and 85% of posted 60 mph speed limit



Data source: WSDOT Northwest Region Traffic Office.

## Fees to optimise throughput

This table is transcribed from a fee chart for Singapore expressways inbound in the AM in 2022.

The fees are in Singapore dollars which are similar to \$AUD. The columns show different routes.

Each road (or group of roads) has its own tailored fee scale.

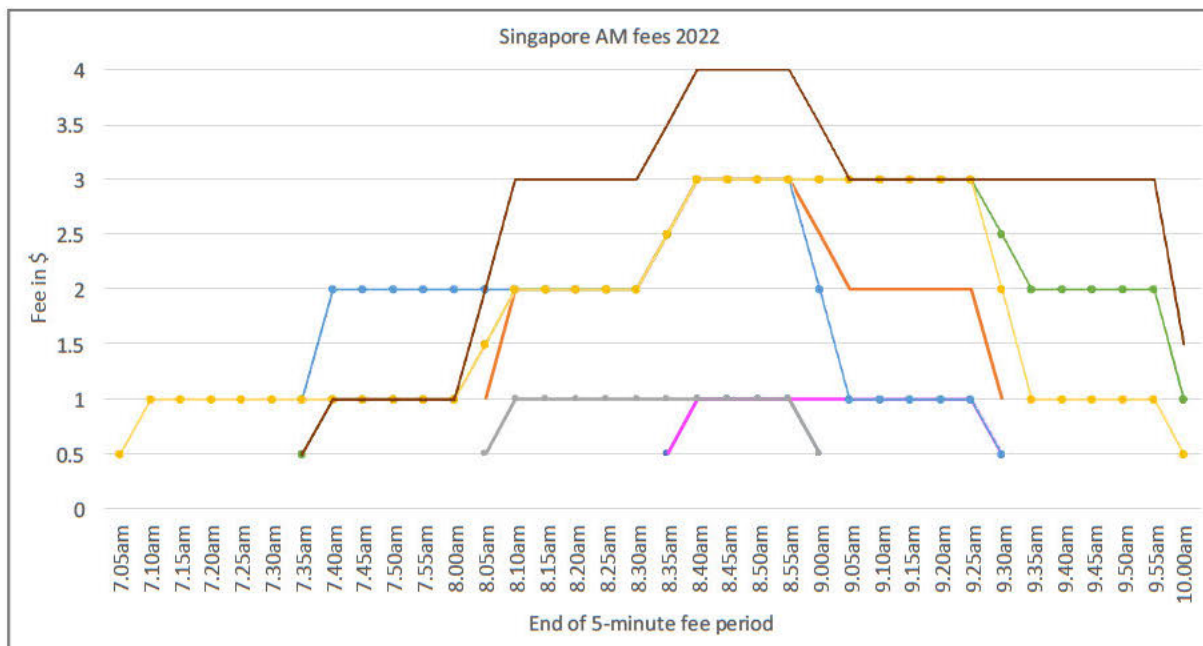
Some tariffs start early, others start later. Some tariffs finish early, others run until 10:00.

The rate of rise and fall varies, as does the peak rate.

	32, 45	36	37, 38	Citybnd AYE	50	68	35	31, 33, 34, PIE
7.00 am							0	
7.05 am							0.5	
7.10 am							1	
7.15 am							1	
7.20 am							1	
7.25 am							1	
7.30 am					0	0	1	0
7.35 am					1	0.5	1	0.5
7.40 am					2	1	1	1
7.45 am					2	1	1	1
7.50 am					2	1	1	1
7.55 am					2	1	1	1
8.00 am			0	0	2	1	1	1
8.05 am			0.5	1	2	1.5	1.5	2
8.10 am			1	2	2	2	2	3
8.15 am			1	2	2	2	2	3
8.20 am			1	2	2	2	2	3
8.25 am			1	2	2	2	2	3
8.30 am	0	0	1	2	2	2	2	3
8.35 am	0.5	0.5	1	2.5	2.5	2.5	2.5	3.5
8.40 am	1	1	1	3	3	3	3	4
8.45 am	1	1	1	3	3	3	3	4
8.50 am	1	1	1	3	3	3	3	4
8.55 am	1	1	1	3	3	3	3	4
9.00 am	0.5	1	0.5	2.5	2	3	3	3.5
9.05 am	0	1	0	2	1	3	3	3
9.10 am		1		2	1	3	3	3
9.15 am		1		2	1	3	3	3
9.20 am		1		2	1	3	3	3
9.25 am		1		2	1	3	3	3
9.30 am		0.5		1	0.5	2.5	2	3
9.35 am		0		0	0	2	1	3
9.40 am						2	1	3
9.45 am						2	1	3
9.50 am						2	1	3
9.55 am						2	1	3
10.00 am						1	0.5	1.5
10.05 am						0	0	0
10.10 am								
10.15 am								
10.20 am								
10.25 am								
10.30 am								
10.35 am								
10.40 am								
10.45 am								
10.50 am								
10.55 am								
11.00 am								

This chart is based on the above table.

It illustrates the different rate of rise and fall of the various tariffs.



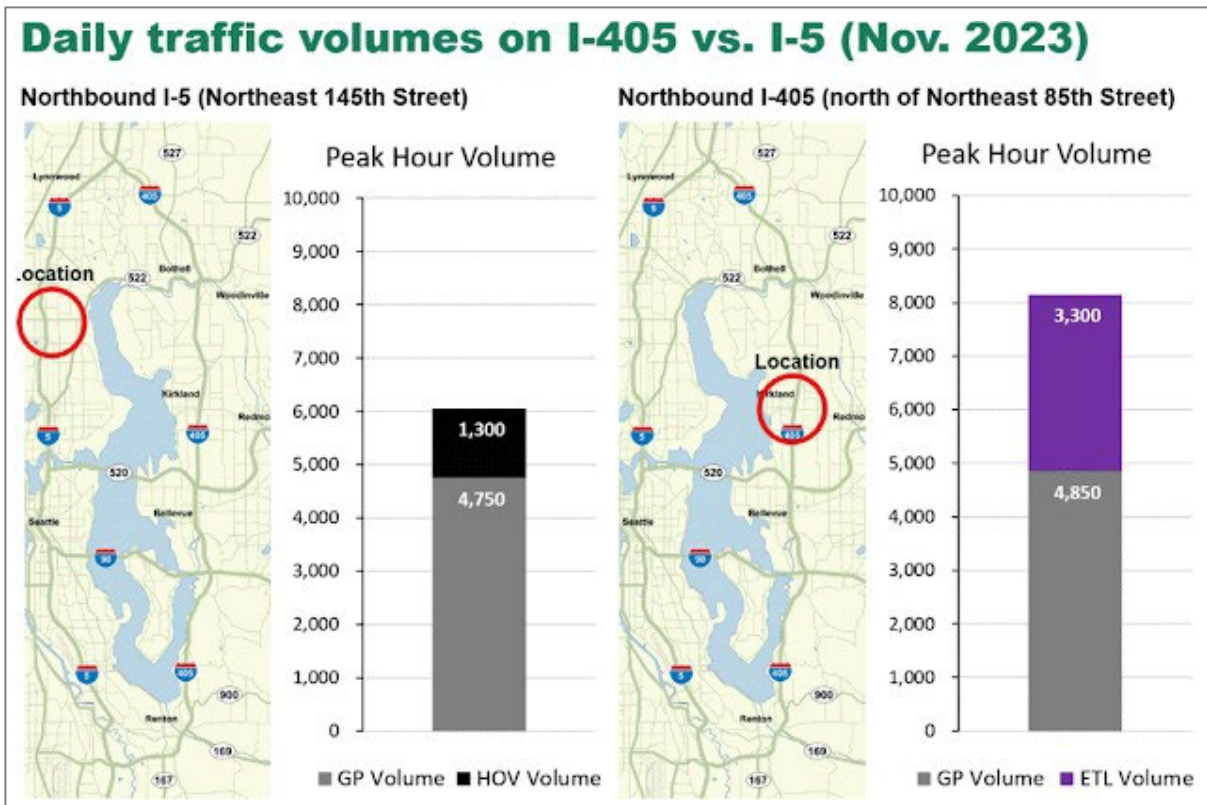


## Washington DOT explains the benefit of time-of-use fees using measures of throughput

### How do the express toll lanes actually help move traffic?

One way to measure the effectiveness of the express toll lanes is to compare them to similar corridors without express toll lanes. In November 2023, we looked at daily vehicle volumes on northbound I-5 at Northeast 145th Street, where the highway features four general purpose lanes and one HOV lane. On this segment of I-5, daily volumes averaged 87,000 vehicles. During that same period, daily volumes on northbound I-405 just north of Northeast 85th Street —where the highway contains three general purpose lanes and two tolled lanes — averaged 108,000 vehicles.

Having at least one lane moving more efficiently acts as a relief valve of sorts and allows more vehicles to get through the corridor. On average, 21,000 more vehicles were able to get through the I-405 corridor in similar traffic congestion and road conditions compared to I-5 in November 2023 because we were able to use tolls to help manage congestion and keep lanes on the roadway moving.



---

## Name: Submission 251885

Do you have any feedback on the Interim Report?

We need to pay less tolls as a whole. I actively avoid toll roads due to not being able to afford paying the toll. In the current environment of a high cost of living I know many people who do the same thing. This is driving further traffic onto local roads which counteracts the benefits of a toll road. The government needs to put the interests of Sydneysiders first and not toll companies and do something to actually get tolls either down to \$0 or at the very least substantially lower as the current situation is completely ridiculous and represents a fundamental failing of governance for the people. Sydney has been sold to the highest bidder who is now simply extracting wealth from toll users.

Do you have any other recommendations you would like the Review to explore?

How to reduce tolls to \$0. How to have these roads be publicly funded not privately so we don't pay tolls. Or have a toll until the road is paid off. This current situation is just plain exploitative and the interests of these large companies are being put ahead of regular people

What are your views on adopting network pricing for toll roads in Sydney?

only positive if it lowers the total amount of all tolls being paid substantially. Otherwise it's worthless and represents political cowardice.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

I think paying tolls like we do is unfair and completely lacks transparency. Once a road has been tolled enough to be paid off, why are we still paying for it? Why is our basic transport system being use as a profit driving machine and simply for transport needs. Sydney roads being focused on transportation and not profit is simplicity.

Setting network tolls with periodic adjustments?

The only meaningful goals of TollCo should be lowering tolls until they no longer exist.

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

If it brings tolls down for users good, again, abolish tolls.

Having an independent, external dispute resolution function for the toll road industry?

I think the toll road industry should be abolished so there would be no need for an independent dispute resolution function. Also these bodies are usually pretty useless and we still end up with more tolls and conditions that favour the toll road industry.

What are your thoughts on disclosing the full details regarding the setting of toll price?

Must be mandatory

What additional details would make you more confident that toll prices are set appropriately?

If tolls were abolished once the road had been paid for. Any toll that is not this is a toll price that is inappropriate

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

Not at all, the current proposed tolling principles are about tinkering around the edges of this issue while maintaining a profitable industry for road toll companies. The system should belong to the NSW government and we should only be paying tolls while a road needs to be paid off

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Toll relief is stupid, why is the government paying a company to reduce the prices of the toll roads? The government putting itself in this situation is embarrassing and represents a failure of governance whereby these choices have been made putting private profit making interests first, and the public's interests second. Toll relief is just a way for the government to try and buy back voters.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Means testing is good.

Also it shows how insecure whoever wrote this question is if they highlight that we can't talk about making tolls free while answering this question. Making tolls free is the ultimate answer

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

All useless unless we make tolls free

Do you think this will better inform your decision to use a toll road?

the only thing that informs my choice is whether or not it is free to drive on a road

What other features would you like to see implemented?

Free tolls

---

**Name: Alex**

Do you have any feedback on the Interim Report?

Yes, it is not strong enough to call out the disproportionately disadvantaged are those in the inner city suburbs.

Setting network tolls with periodic adjustments?

Escalation rate are criminal and those agreements should be referred to iCAC, nobody was acting in the interests on the people when the sole supplier of a service chooses CPI or a fixed %.

---

## Name: Submission 251888

Do you have any feedback on the Interim Report?

Excellent general recommendations in particular, the structure of the tolls (Findings 4- 8) and the disproportionate impact on those living in my postcode and further west (Finding 8) who have no other option but to take a toll road in order to arrive in the city centre in time to start work

Do you have any other recommendations you would like the Review to explore?

Associated costs with toll roads eg. Increased petrol costs when the toll roads become too congested eg. M2 at peak hour is just as bad as the non-toll roads and instead I pay a privilege to be stuck in traffic for over an hour. Additionally, associated parking costs on either end of the toll roads.

What are your views on adopting network pricing for toll roads in Sydney?

A good idea - network pricing would make it fairer for all users

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Again, this would make it fairer for all users and enable those who use the greatest toll road distances to pay the most - this needs to be balanced against users who have no other option but the toll roads eg. users in the far west of Sydney

Setting network tolls with periodic adjustments?

No opinion

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

No opinion

Having an independent, external dispute resolution function for the toll road industry?

Good idea - especially if there are disputes with the toll provider

What are your thoughts on disclosing the full details regarding the setting of toll price?

Great idea - enables households to budget based on their toll usage for the coming months or quarters

What additional details would make you more confident that toll prices are set appropriately?

Independent review at least annually against cost-of-living expenses and other expenses to see if it is unreasonably high

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Toll relief is a pretty essential service for those who have no other choice - there should be strict limits on access but it should remain

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Agree with all these initiatives and agree that toll relief should be means tested but also usage tested - a means tested relief for a toll user within the bracket who only spends

\$100 a year is going to be of less use than some relief for a toll user outside the means tested bracket that spends \$5,000 per year on tolls.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Not really necessary

Do you think this will better inform your decision to use a toll road?

No - I have no choice in whether I use a toll or not - unless I want to spend 2.5 hours on the road in the morning in peak hour, I need to use a toll road

---

**Name: Tim**

Do you have any feedback on the Interim Report?

I agree with it broadly but would prefer higher tolls overall and a significant amount of investment in active transport and public transport rather than back into roads

What are your views on adopting network pricing for toll roads in Sydney?

Good

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Good

Setting network tolls with periodic adjustments?

Fine

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Yes

Having an independent, external dispute resolution function for the toll road industry?

Yes

What are your thoughts on disclosing the full details regarding the setting of toll price?

Yes please

What additional details would make you more confident that toll prices are set appropriately?

Everything

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

No. More money needs to go into public transport and active transport infrastructure.

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

No. Tolls should be kept to fund public and active transportation

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Broadly the proposal is fair

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Not sure

Do you think this will better inform your decision to use a toll road?

Maybe

What other features would you like to see implemented?

None



---

## **Name: Submission 251960**

Do you have any feedback on the Interim Report?

Completely agree that the government should take control of tolls levied to safeguard the public from being exploited. West Connex especially is extremely unreasonable.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Charging high amounts benefits the private toll operators, and toll relief is funded out of tax payers money ultimately. So this system only benefits the toll operators in the end.

---

## Name: Kevin

Do you have any other recommendations you would like the Review to explore?

Link T appear to be gouging Sydney visitors with unnecessary administration charges. A recent trip resulted in a number of toll charges. An internet investigation, over a few days, into my fee resulted in just one charge being noted and therefore paid. Several days later one fee was received by mail with admin costs (\$10.00) many days later another fee and another admin cost (\$10) was received. On the net all fees were listed and yet another fee for (\$10) was charged without a letter being sent. In essence, one letter noting all costs for a single day could have been sent. This is purely gouging. I am yet to request a return of one admin cost for no letter being sent.

What are your views on adopting network pricing for toll roads in Sydney?

Gouging through admin costs . Link T's actions as a representative of NSW Government are a disgrace.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Link T has no consideration of fairness.

---

**Name: Michael**

Do you have any feedback on the Interim Report?

When I take the M5 from say, Revesby, under the airport runway to Foreshore Drive in Botany, I get slugged with the M5 (\$5.54) AND M8 (\$7.98) tolls. Even though as far as I can tell I'm only travelling on the M5 and am not accessing the M8 at all. (Prices as per my last bill.)

I can't find a way to get from the M5 to the Eastern Suburbs without paying the M8 toll as well. Anyone know how this can be done?

# Detailed statement

Tot Trips. 7

Date	Time	Start - Finish	Vehicle Class	Amount\$
30/12/2023	17=59	Transurban Interlink Roads Ply Ltd (105) - Fatrf0(d Road		5.54
30/12/2023	17:50	Westconnex (140)- GeneraJ Hot.mes - KGR {MSW ML)		7.98
30/12/2023	13:31	WestConnex (1 Rd - St Peters		10.91
28/12/2023	10:58	We-s1Connex (140) - General Ho<mes - Kingsgrove Rd		6.69
28/12/2023	08:22	We-s1Conn&x {140) - KGR (M5W ML)- General Holmes		7.98
28/12/2023	08:20	Transurban Jnteriink Roads Ply Ltd _05 - Fairford Road		5.54
14/10/2023	12:38	Wes1Connex (140) - St Peters - COOCOC'd/S1rath		7.80

196  
Total for Tag

52\_44

---

## Name: Rob

What are your views on adopting network pricing for toll roads in Sydney?

I think there should be no flag fall, all tollways should have the same rate per km and all tolls should be capped after the same distance. That way users would pay exactly the same per km rate regardless of which toll way they are using and how far they travel.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

I think the declining distance charge can be dealt with by applying the same distance cap to all roads and adjusting the per km rate. I'm not in favour of an infrastructure charge. I think that can be adequately dealt with by setting the per km rate. An infrastructure charge just distorts the real per km rate and penalizes users who travel short distances. A uniform per km rate across all toll roads provides the most efficient, simplest, most transparent and fairest outcome for all users.

Setting network tolls with periodic adjustments?

I'm in favour of the TollCo replacing the current system. The adjustments to tolls should be no more frequent than annual and I guess we are stuck for 4% or inflation, whichever is the greater.

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

No opinion

Having an independent, external dispute resolution function for the toll road industry?

An independent dispute resolution body works in other areas, why not toll roads.

What are your thoughts on disclosing the full details regarding the setting of toll price?

Transparency is a good thing. People can understand the system if it isn't transparent.

What additional details would make you more confident that toll prices are set appropriately?

Setting the multipliers at levels which reflect the relative size of the vehicles is essential for the credibility of the tolls. Setting motorbikes at the same toll as cars is plainly ridiculous. Setting the multiplier for motorbikes at half the rate of a car is still demonstrably ridiculous. There is precedent for setting motorbikes at a quarter of the toll of a car and it would make sense to adopt a 25% multiplier for motorbikes.

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

Not at all. The proposed New Principle 'i' only mentions setting higher tolls for heavier and larger vehicles. It ignores all the discussion in the report about setting lower tolls for motorbikes based on their relative size. It should explicitly state that the multipliers for all vehicles should be commensurate with their relative size. If a truck can get away with a multiplier of 3 despite being upwards of 10 times the size of a car, then motorbikes should be set at a multiplier which is no greater than 25%.

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

I'm not opposed to phasing out all relief if the tolls are truly fair. But if they remain at their current unrealistic levels with built in escalation above the inflation rate, then there should be no change to the

relief mechanisms, I am particularly in favour of daily and weekly limits in a similar manner to the daily and weekly caps on public transport fares.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

How do you fairly means test toll relief given the way people can manipulate their taxable income? I keep coming back to setting the same per km rate on all toll roads at a fair level (not the outrageous tolls that currently exist), setting the same distance caps and removing the flag falls that push up the cost of short trips and distort the real per km rates.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

These would all be good initiatives and aid transparency.

Do you think this will better inform your decision to use a toll road?

Yes.

What other features would you like to see implemented?

I think I have already made these clear.

I would like to make the following points in relation to the review of toll roads in NSW.

It is obvious that Sydney's toll roads are under utilized as a result of the high cost of tolls.

I am an example of someone who steadfastly refuses to use toll roads wherever possible because I think they are too expensive. Because of people like me, the toll roads are under utilized and non toll roads remain congested.

I think toll roads are immoral. They are part of public infrastructure and should be provided toll free for the benefit of the broader community in the same way that suburban roads and interstate highways are provided toll free. The Interim Report acknowledges (page 58) the argument that even non users benefit from an efficient road network. This undermines the argument only users should pay to use certain roads. The Interim Report also finds that toll road users bear a disproportionately high proportion of the cost of toll roads compared with other beneficiaries who do not directly use the toll roads (Finding 3).

The concept that only users should pay for using certain roads ignores the public benefit that roads provide to the general community. Anything that makes road transport more efficient benefits everybody, whether they travel on toll roads or not.

If governments need more money to build public infrastructure, then they should raise taxes, not penalize just one sector of the community for using certain roads.

When I was growing up the toll each way on the Harbour Bridge was a shilling (10c) for cars and three pence for motorcycles (2.5c) each way. For more than 30 years that was the only toll road in Sydney and it helped establish my belief that motorcycles should be charged less than cars and trucks for using a toll road.

Having ridden in over 50 countries around the world, my experience is that other countries generally charge a cheaper toll for motorcycles. Major world cities like Rome, Delhi, Paris, Istanbul, Singapore, Athens, Madrid etc would grind to a halt if it weren't for the large numbers of motorbikes used by commuters every day.

After complaining to the relevant Minister several years ago that motorbikes were being charged tolls that were too high compared with other vehicles, I was told, in writing, that motorcycles should be charged the same as a car because they take up the same amount of road as a car. The person who wrote that had obviously never ridden a motorcycle and gave that response out of complete ignorance. A motorcycle takes up space on a road in approximately the same ratio as a car does to a truck. Trucks are generally charged 3 times more than the cost of a toll for a car, depending on the road, on the basis that they take up more room and cause more wear to the road. That seems intuitively true. But if it is true, then the same logic justifies charging motorcycles no more than 33% of the toll for a car.

There is acknowledgement of the inequity of charging motorbikes the same toll as cars in the statement on page 61 of the Interim Report where it says "*The current vehicle classification system also leads to toll prices which do not appear fair or efficient.*" This inequity is also discussed on Page 62 of the Interim Report where it says "*Numerous submissions to the Review considered the current toll prices for towed caravans and motorcycles to be unfair as they are paying the same price as a higher mass/size vehicle for the same journey.*" The Interim Report also acknowledges that Victoria and Queensland charge motorcycles half the toll that applies to a car. I urge the Review to include specific recommendations to address the toll inequity that currently applies to motorbikes in their final report.

The interim Report discusses the merits of using the Value of Travel Time as a factor in setting tolls. I know from personal experience as a lifelong motorbike rider that travel time on the urban road network using a car is considerably reduced by using a motorbike (more than halved during peak times). The value of travel time comparison between tolled and untolled roads using a motorbike provides considerably less benefit to motorbike riders which should justify a lower toll. For example, from my home to the airport by motorbike is actually quicker using a motorbike on the untolled roads than using the alternative M8 (which is also longer). In this case the toll road (M8) is a less efficient means of transport for a motorbike, so why would I choose to use the M8 at all, even if it was free?

In reference to the introduction of a new category of toll user for motorbikes, the Interim Report says (page 121) *“Given that motorcycles constitute a minor proportion of vehicles on toll roads, the overall impact of this change is expected to be minimal.”* The use of toll roads by motorbikes is currently minimal, in part because the value of travel time for motorbikes using toll roads is significantly less than for a car. The difference in travel time between a toll road and an untolled road is much less on a motorbike. The current cost of toll roads means that the cost/benefit for motorbikes using toll roads just doesn't add up in the same way it does for a truck or a car. If the cost of toll roads was reduced for motorbikes, it would encourage more bikes to use toll roads which could actually increase total toll revenue with no offsetting increase in road operating costs or congestion.

The Interim Report (page 123 Recommendation 8) stops short of actually recommending an actual new multiplier for motorbikes. The final report should get off the fence and recommend a new motorbike multiplier of 25% for the reasons I have discussed above.

The 2014 Tolling Principles (page 96) include a principle that trucks pay 3 times the toll for a car but does not include a reciprocal principle that motorbikes pay no more than one third the toll of a car. This needs to be corrected so it is specifically addressed in the Proposed New Tolling Principles (page 99). The proposed Principle i only mentions setting higher tolls for heavier and larger vehicles. Using the same logic, this New Principle should be modified to specifically acknowledge that motorbikes should be charged less than a car by a factor of at least 3.

Recommendation 8 (page 101) in the Price Reforms says *“The NSW Government should further explore refining tolling classes in NSW, adopting a uniform definition for Class A vehicles, and a fairer classification for towed recreational vehicles and motorcycles”*. Recommendation 11 says *“Vehicle multipliers should be applied consistently across the toll road network.”* Recommendation 14 says *“The NSW Government should investigate the scope of the tolled network in Sydney to achieve greater consistency, efficiency, and fairness.”* Charging motorbikes, at most, one third of the toll for a car would be consistent with these recommendations in the Interim Report. The recommendations in the final Report should go further and call for a multiplier for motorcycles of 33% to 25%.

Even Transurban acknowledged that the system needs greater fairness (page 103) *“With much of the Sydney network becoming well established, we recognise that there is now an opportunity to revisit the current pricing regime in terms of fairness, simplicity and transparency for customers and a more efficient road network performance.”*

Page 121 the Interim Report suggests a multiplier for motorbikes of 50% that of a car. This is inconsistent with the historic cost of tolls on the Harbour Bridge (which is the only NSW toll that recognized that motorbikes should pay a lower toll than other users). A 50% multiplier for motorbikes is also not consistent with the relative size of a motorbike and the space they occupy on the road compared with a car. A motorbike takes up less than a quarter of the space of a car. The 50% multiplier is inconsistent with the relative wear and tear to roads that a motorbike causes which is almost immeasurably small compared with a car. The 50% multiplier is inconsistent with the 300% multiplier for heavy vehicles compared with a car where the truck is up to 10 times the size and weight of a car. Just because Queensland and Victoria use a multiplier of 50% doesn't mean that they got the comparison correct. I suggest a motorbike multiplier of at most 33% and preferably 25% compared with a car.

Lowering the toll for motorbikes would be an incentive for more drivers to switch from cars to motorbikes. This would assist in lowering CO2 emissions and reducing road congestion, both of which are of concern to the State Government.

There is no valid reason for charging an additional licence plate matching fee (between 50c and 75c) where a user travels on toll roads without a tag and has entered into a 'registered vehicle licence plate number' scheme, given that the entire process is automated and no additional cost is incurred by the toll operator. Incidentally, the toll matching fee is waived for motorbikes because the e-tag technology is not considered satisfactory for use on motorbikes.

It should be acknowledged the tolling system on the Harbour Bridge was originally both ways. To reduce congestion, it was decided that to charge double the toll in one direction and remove the toll in the other direction. So the tolls for the harbour crossing have always been set on the basis that the toll



covers both directions. If the system is to be changed so that tolls are charged in both directions, then it should be done on the basis that the combined two way toll costs no more than the existing one way toll.

Changes to the existing harbour crossing tolls should not just “*focus on heavy vehicles and benefits of time-of-day pricing*” (page 105) but should equally consider fairness for motorbikes

My understanding is that the E-Rider system, which only operates on the existing harbour crossings, was implemented because traditionally motorbikes were charged one quarter of the car toll. If motorbike tolls are reduced to one quarter of the car toll, then I concede there would be not be a good justification to retain the existing E-Rider scheme.

Here are some general comments on the tolling of all roads:

- The toll flag fall disproportionately increases the relative cost of short trips and should be abolished.
- The per km rate on all toll roads should be the same and after a certain distance the same total cap should also apply.
- There should be a daily or weekly cap on tolls to keep the total cost down for people who are heavily reliant on toll roads.
- There should be off peak and weekend rates on all toll roads. For example, traffic is heavier on Parramatta Road on weekends than week days because more people avoid the M4 on weekends when they have more time to reach their destination. If the toll was lowered on weekends it would encourage people off Parramatta Road.
- Principle 10 of the Tolling Principles says “*Un-tolled alternative arterial roads remain available for customers.*” That clearly did not apply with the Lane Cove tunnel where the provision of a 4 lane tunnel was offset by reducing the number of lanes on Lane Cove Road. This penalized road users who didn’t use the tunnel.
- If there is an eventual adoption of a universal distance-based road user charge to replace petrol excise, then it should be set at a level which would replace all road tolls as well. Such a charge should also use a multiplier which substitutes for fuel efficiency as a proxy for determining the relative impact of different vehicles on the road network ie road users should not all pay the same rate and smaller, lighter vehicles should pay less while larger, heavier vehicles should pay more.

---

## **Name: Submission 252095**

Do you have any other recommendations you would like the Review to explore?

Why do we have 10 entry. Points and one freeway exit on M4 ( church street only ) on east bound traffic .

When M4 was reconstructed no work was done on it between church street and James ruse drive exit why not give motors 3 more free way ... exit James rue , auburn ( silver water and also Olympic park ) .

It will ease congestion and also less accidents on church street exit . As nsw motorists pay for road tax and it's quiet busy in parramatta road and need to ease some pressure on parramatta road please ... also m4 entry near Burwood omg who decided to keep one lane for Parrmatta road , creates a long long que .. we sometimes need to think out side the box and create a constant flow to ease the pressure on our roads and driver's behaviour changes due to congestion.

Why not restrict trucks between 7-9 am and also 1600-1800 on parramatta road . During peak hours .

Have a better toll system as atm it's toooooo expensive and people tend to avoid . We need to make public transport bit better so people can really on it , stop night ride buses and have 24/7 trains which will bring life back to city .

Toll currently tooooooo expensive in Sydney need to get better system .

**What are your views on adopting network pricing for toll roads in Sydney?**

Review roads

Have more freeway exit for M4 east bound ( currently only James rue drive ) becomes

bottle neck and have had so many fatalities after reconstruction of M4 and new toll . Must give NSW motors better access as u have created more entry less exit ( free exit James rue and silver water and Olympic park ) and will ease congestion.

**What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.**

I felt old system of having one toll was better , may be capping it is better and give money back and just charge gst . More motorist will use rather empty motorways . Give user reason to use and charge them fairely atm very expensive motorway and no one using it and worst of all truck avoiding and going on parramatta road making congestion..

Why not have road and transport for the public not for profit making .. get rid of night ride bus so more people can use railways whole night .sydney needs to become 24/7

---

## Name: Will

Do you have any other recommendations you would like the Review to explore?

More new rebates for tolls and looking into the impact of future new projects

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

should be distance based and cheaper when there is motorway works going on e.g. M7 motorway is very slow at the moment due to construction work so not much value for money in using it

Setting network tolls with periodic adjustments?

disagree

What are your thoughts on disclosing the full details regarding the setting of toll price?

agree

What additional details would make you more confident that toll prices are set appropriately?

agree

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

agree definitely helps with these toll relief

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

needs more work and clarity

What other features would you like to see implemented?

tolls to match CPI every year

---

## **Name: Submission 252099**

Do you have any feedback on the Interim Report?

The suggestion of reducing toll prices based on the distance driven (recommendation 3) means encouraging more cars and vehicles to drive in our cities, which in turn can contribute to increasing traffic!

Do you have any other recommendations you would like the Review to explore?

Why not explore ways we can somehow link it with public transport? For instance, if you use public transport for a certain distance and then use the toll, you will pay 20-30% less on the toll.

What are your views on adopting network pricing for toll roads in Sydney?

It would contribute to more traffic.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

as mentioned in my response, it would encourage more cars and vehicles to drive in our cities which contribute to increasing traffic.

---

## Name: Submission 252101

### Do you have any feedback on the Interim Report?

Unfortunately, the report has totally missed safety concerns when recommending Toll efficiencies in the report.

For example, the M4 motorway near Parramatta dubbed "crash alley" still has a high number of fatal crashes despite recent improvements. The NSW Centre for Road Safety found a notable increase in "casualty crashes" at the Church Street off-ramp and nearby areas after tolls were introduced on the M4 between Parramatta and Homebush in August 2017.

### Do you have any other recommendations you would like the Review to explore?

A lot of motorists on M4 East bound continue to drive dangerously by seeking to avoid a toll at the Church Street exit. This not only slows down the traffic in the peak times but also endangers other motorists.

This also leads to more cars on Parramatta Road and clogs it up during peak hours.

I recommend removing toll on M4 between Parramatta to Silverwater (Auburn) so that motorists have an option of exiting on Silverwater road and continue their journey toll free from there onwards.

I would also like to recommend peak and off-peak Toll rates (based on the time of the day) so that people can take better advantage of it (similar to Sydney Trains rates).

### What are your views on adopting network pricing for toll roads in Sydney?

Agree, should be uniform and based on distance based. Its a no brainer.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Same answer as above

### Setting network tolls with periodic adjustments?

Good idea, take the power away from the private entities and create a TollCo.

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Yes, agree

### Having an independent, external dispute resolution function for the toll road industry?

Yes, this is needed.

### What are your thoughts on disclosing the full details regarding the setting of toll price?

This would be great. Often the public does not know how much money has already been paid to Transurban and how many years are left for the toll road to become toll free.

What additional details would make you more confident that toll prices are set appropriately?

Pricing structure would be good.

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

Yes, agree. Should be declining based on distance travelled.

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

No comments

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

No comments

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

No comments

Do you think this will better inform your decision to use a toll road?

No comments

What other features would you like to see implemented?

No comments

---

## Name: Submission 252103

Do you have any feedback on the Interim Report?

Emissions reduction should be the primary consideration in toll reform. We can't continue to encourage people to drive when we are in a state of climate crisis, and having to spend billions on roads due to extreme events. We need to break the cycle... and we need leadership on this issue. Appreciate people in regional, outer and western suburbs do not have as many transport options and or services, but then let's focus our efforts on improving travel options and services for these communities. Driving as a last resort needs to be the aim.

Do you have any other recommendations you would like the Review to explore?

Linking tolls to Emissions. Bigger, polluting vehicles pay higher prices.

What are your views on adopting network pricing for toll roads in Sydney?

More clarity and consistency needed. Need to ensure pricing reform doesn't continue to embed social disadvantage.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Social disadvantage and emissions need to be the primary drivers and consideration for fair pricing. We should be aiming to reduce both with any reform.

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Provided IPART is not solely focused on cost recovery. There needs to be a broader remit to ensure all costs of private vehicle use and pricing mechanisms need to work to reduce social disadvantage and emissions.

What are your thoughts on disclosing the full details regarding the setting of toll price?

Supported.

What additional details would make you more confident that toll prices are set appropriately?

Considerations in pricing for wider economic impacts related to climate change, emissions and resilience.

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

No – the primary objectives of tolling should be to reduce social disadvantage and reduce private vehicle use and related emissions.

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Do not support toll relief unless means tested and based on availability of alternative transport options and emissions.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Supported. Emissions should also be a consideration. For instance, large polluting private vehicles being driven from suburbs where there are alternative transport options should not receive relief. Need to discourage private use where there are alternative transport options, otherwise we are encourage private vehicle use and less sustainable travel choices.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Tell motorists how much emissions they are generating and how much they would save if they caught public transport instead.

Do you think this will better inform your decision to use a toll road?

If I was informed on how many emissions I was generating each time I drive a private vehicle, this would encourage me to use more sustainable transport options.

What other features would you like to see implemented?

Tell motorists how much emissions they are generating and how much they would save if they caught public transport instead, and tell them what services are available on nominated routes.



---

## Name: Submission 252105

Do you have any other recommendations you would like the Review to explore?

I recommend including special discount for senior/retired citizens to encourage the participation of the social activities any where in NSW. It should be great to provide free toll for senior people over 65.

What are your views on adopting network pricing for toll roads in Sydney?

Support with special discount for senior/retired citizens. It should be great to provide free toll for senior people over 65.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

I am a senior citizens over 65. I try to avoid toll road during weekends as it is very expensive. Therefore, it limits my travel and activities to certain extent.

Setting network tolls with periodic adjustments?

Corporate citizenship. Offer more discount and toll free to senior people over 65.

What are your thoughts on disclosing the full details regarding the setting of toll price?

Good idea.

What additional details would make you more confident that toll prices are set appropriately?

Annual financial report of the toll operators.

---

## Name: Submission 252111

### Do you have any feedback on the Interim Report?

Recommendation 5 - means testing should not be included. This is another way of shafting the already strained middle income earner.

Recommendation 8 - Agree this is a sensible approach to fairer outcomes across vehicle types, however the LTRVTR already shows many recreational towed vehicles tipping over the minimum dimension 2.8m height and 12.5m length. It only takes a roof mounted A/C on a caravan and its over. A longer draw bar for better towing and its over. Yet the weight GVM is less than 9T typically so the ESA is not the same as a truck carrying 15 tonnes of concentrated freight over 2 axles. Its carrying it over 6, 8 or in some case 10 axles - meaning the ESA is very low yet the toll tips to Type B. My tandem axle car trailer exceeds it by just 100mm in length on my Nissan Navara, so i get tolled as a truck for barely 6T GVM over 4 axles. That is pure insanity.

Recommendation 16 - State Toll Co will end up wasting money instead of saving it. This sounds good on a report but another government silo is not what we need. Make a department under TfNSW and get these things done there. They are already aligned with the Roads Act 1993 and can play a much stronger role in pushing toll road operator competition. If they even need to exist. Refer my other comments.

### Do you have any other recommendations you would like the Review to explore?

Its high time government looked at cutting up the toll road contracts and going back to the old model we delivered the M1 and Sydney Harbour Bridge under. Tolling a road should pay back the loaned money used to build it then it goes back to being a state asset. Instead its propping up profit margins in multi-nationals at joe public expense. It is time we as a state stopped fobbing off our lack of maintenance under get rich quick schemes needed to keep pace with the growth we self propagate. Buy back the toll roads and manage them in house under TfNSW on behalf of tax payers.

### What are your views on adopting network pricing for toll roads in Sydney?

I think network pricing regardless needs to happen. Its a horrible system now that absolutely means i will not use these roads unless i have to. I drive on the old roads because the cost to take the M7, M2, NCX for instance is a joke. It should be distance based but also linked to road performance in terms of time. If the average trip time is met because the toll road maintained a threshold speed then im happy to pay. But paying the privilege to park on the M7 is a joke. The cross city north south routes are some of the worst yet we keep pushing more and more east west ones

### What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

I think this is a logical approach. Particularly penalising those who would use a toll road for just a few short km - treating the Motorways as local road. These are wasted trips straining that network - remove these by charging more you pick up efficiency. If you are travelling long distance it should be in your best interest to see value of a toll road.

### Setting network tolls with periodic adjustments?

Why is it that tolls increase faster than CPI and yet wages never follow CPI. Cost of living right now is killing our economy -periodic adjustments to tolls need to be carefully linked to economic conditions rather than just constantly rising.

### What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Assuming IPART have teeth. Too often these watchdogs have no teeth or wont use them, meaning all they actually do is waste even more tax payer money to achieve nothing.

### Having an independent, external dispute resolution function for the toll road industry?

Who's having a dispute in the industry? By making it PPP focussed we have built an industry that expect to suck the tax payer dry for life. Cut up the contracts and take it back to state assets, state controlled and state operated (with services contracted out). Watch the disputes disappear then. They will beg for the contract to operate it.

### What are your thoughts on disclosing the full details regarding the setting of toll price?

Yes - this needs to happen. We need to know where its going because after 20 years sitting on the M7 in traffic jams its damn sure not going back into making it a better road.

### What additional details would make you more confident that toll prices are set appropriately?

Nothing to offer

### Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

I think they go a long way to improving the mess we have been stuck with for over 2 decades now.

### What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

A system that works won't need toll relief

### What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Recommendation 5 - means testing should not be included. This is another way of shafting the already strained middle income earner.

### What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

nil to offer

### Do you think this will better inform your decision to use a toll road?

Price and trip time are the two reasons I travel on a toll road. Google maps is typically my first check, but i am now doing it by gut feel based on years of experience.

### What other features would you like to see implemented?

The LTRVTR already shows many recreational towed vehicles tipping over the minimum dimension 2.8m height and 12.5m length. It only takes a roof mounted A/C on a caravan and its over. A longer draw bar for better towing and its over. Yet the weight GVM is less than 9T typically so the ESA is not the same as a truck carrying 15 tonnes of concentrated freight over 2 axles. Its carrying it over 6, 8 or in some case 10 axles - meaning the ESA is very low yet the toll tips to Type B. My tandem axle car trailer exceeds it by just 100mm in length on my Nissan Navara, so i get tolled as a truck for barely 6T GVM over 4 axles. That is pure insanity

---

## Name: Submission 252122

Do you have any other recommendations you would like the Review to explore?

Existing tolls should generally be much lower, but the burden of tolls should be spread across the entire motorway network. There should be no free motorways, cashbacks, etc.

The above change would have to be accompanied by a clear public message that tolls are, from now on, to support the entire motorway system (existing and future), not to pay for individual lengths of motorway. The user needs to contribute to sustaining that system (just like public transport), the taxpayer can't be expected to pay for it all.

Whatever you think of the uncoordinated approach to motorway development and tolling by recent governments, a massive improvement to the motorway network has been achieved (making up for decades of neglect). But the work is not over. It is vital that any new tolling arrangement does not put obstacles in the way of future motorway projects.

What are your views on adopting network pricing for toll roads in Sydney?

Agree.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Agree.

Setting network tolls with periodic adjustments?

Yes.

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Yes.

Having an independent, external dispute resolution function for the toll road industry?

Yes.

What are your thoughts on disclosing the full details regarding the setting of toll price?

Agree.

What additional details would make you more confident that toll prices are set appropriately?

What proportion of the cost of the motorway system (building & maintaining) is paid by: 1. the taxpayer (if any); 2. motorists in general; 3. toll-paying motorway users; 4. others if any. Total = 100%.

What proportion of tolls (approx) goes to the profits of the toll companies.

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

Unlikely to be sufficient. Need to spread the burden more widely, consistently.

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Agree with phasing out toll relief IF tolls can generally be reduced.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Re 'alternative transport options', I object to 'demand management' and other measures designed to punish motorists for not using public transport. Often, especially for trips from suburb to suburb rather than into the CBD, there is no good public transport option and is never likely to be. Citizens are entitled to expect a good road system, not lectures and punishment.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Not as important.

---

## Name: Submission 252124

Do you have any feedback on the Interim Report?

very detailed,

agree we are the most tolled state in the hemisphere and with the cost of living tolls have become largely expensive for non frequent users compared to frequent users who are paying on average \$50.00 per day and only one cashback rebate and many other toll rebate incentive that dont cover all users.

Do you have any other recommendations you would like the Review to explore?

look at one toll charge on the private toll roads and this is lock in for a period of time

/years and only increase by a percentage every 5-10years - similar to SHB /SHT increase

Motorcyclist are paying the same toll as motor vehicles and this review is required.

Age Pensioners who hold a blue card and their plate registered under a pensioner, should pay a discounted toll and should only be limited to 2 plates under a discounted toll, we offer no charge for TPI/ DVA and hand control modified vehicles for disabled drivers when travelling on SHB/SHT no discount for Age pensioners.

Ride share and taxi's a deep dive into on-charging customers tolls and then not paying tolls should be reviewed.

Toll Relief review

Better app service for NSW residents

What are your views on adopting network pricing for toll roads in Sydney?

it should be affordable and not distance base, and not increase quarterly

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

agree

Setting network tolls with periodic adjustments?

should be capped and reviewed every 5 years with a slight percentage increase

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

include the toll operators to agree on pricing

Having an independent, external dispute resolution function for the toll road industry?

disagree each toll operator are equipped to making sound business decision by having an independent party may override toll operators' decision and who pays for that decision.

What are your thoughts on disclosing the full details regarding the setting of toll price?

yes transparency is important who ultimately makes the decision

What additional details would make you more confident that toll prices are set appropriately?

consultation

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

no

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

need to address the toll pricing and it should be phase out and maybe the govt should consider purchasing and tolling more roads to then consider another rebate - there is no even playing field.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

we don't need another toll relief we need an even playing field with any new toll roads operated by the govt team to manage revenue.

What are your views on the proposed improvements to motorists experiences i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

really need an interactive App that services the customers understanding in the transport space

Do you think this will better inform your decision to use a toll road?

yes

What other features would you like to see implemented?

A governing body

---

## Name: Submission 252129

Do you have any other recommendations you would like the Review to explore?

Prior to the introduction of the M8.

Motorcycles had been tolled at a lesser rate than cars. Approximately half. We now see motorcycle tolled at the same rate as cars.

I have not seen any valid explanation for this.

Further the tolls increase on a regular basis, this is a great financial impost on those using the Tollroads around Sydney

Setting network tolls with periodic adjustments?

Too often too much

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

It would be a step in the right direction

What are your thoughts on disclosing the full details regarding the setting of toll price?

All factors in the decision making process.

What additional details would make you more confident that toll prices are set appropriately?

I am confident tolls are way too expensive and that there is no justification for regular toll increases.

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Toll relief is necessary as tolls continue to rise.

Taxes and levies are collected by government to provide infrastructure.

The amount of tolls paid I am sure are in excess of what is required.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

I do not believe in means tested toll relief



---

**Name: Ranjan**

Do you have any feedback on the Interim Report?

The Toll fee is higher in these times of increased cost of living. The Toll cap must be fixed at AUD8.00 per one use.

What are your views on adopting network pricing for toll roads in Sydney?

Good decision to network all the toll roads

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Good to have declining distance pricing as it provides the user an option to plan and reduce the toll fee.

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

Yes, It provides the user the tool to decide on the toll road usage.

---

## Name: Submission 252193

### Do you have any feedback on the Interim Report?

I support two-way tolling on the Harbour Crossing and the Eastern Distributor if it is halved for each direction, not doubled.

### Do you have any other recommendations you would like the Review to explore?

I live right by the entrance to the Eastern Distributor on South Dowling st. There is no incentive for me to use it to cross the CBD as it's approximately \$10 when I will only save a few minutes and can instead drive through Surry Hills to reach the bridge. If everyone in the area thinks like me, and everyone I know does, then the inner city streets have quite a number of cars that are locals traversing inner city from south to north, primarily on Crown st.

If all those local cars used the Eastern Distributor to get to William st or the Harbour Tunnel, then it would ease traffic congestion in the city...even if that's only 5% of cars, that's a significant amount.

What about offering a serious reduction in tolls on the Eastern Distributor for people living within a few hundred metres of the ED entrance, maybe identified by cars registered in the 2010 and 2016 postcodes?

Currently we do not use the ED anyway due to the cost, so it's not takin revenue away from the operator and can only improve the local traffic situation

### What are your views on adopting network pricing for toll roads in Sydney?

agree. If I use the Eastern Distributor and transfer straight onto the Cross City Tunnel, I pay 100% of the tolls for both roads, making it about \$16 which is ridiculous. If this was considered 1 trip, a bit like the way an Opal Card works on our transport system, then it might be more worthwhile

### What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

I completely agree as people who live further out shouldn't be penalised for having to come in to work etc, but at the same time, charges like \$6.80 for a short trip on the Cross City Tunnel are ridiculous and means local are actively avoiding these roads.

If all inner city locals used the toll roads, you'd improve the traffic flow in the surrounding areas so there should be an incentive to get people onto the CCT and the ED

### Setting network tolls with periodic adjustments?

Yes, but the times and discounts need to be such that it actually changes people's behaviour. Nobody is going to travel 30 minutes earlier on the Harbour crossing just to save \$1.50, but if it were, say 50c or even free, between 5:30 - 6:30am it might affect people's behaviour which in turn improves traffic after 6:30am

### What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

yes definitely

### Having an independent, external dispute resolution function for the toll road industry?

as long as it has teeth

What are your thoughts on disclosing the full details regarding the setting of toll price?

this should be the case so the public can see justification in the prices and also force government's to sign fairer contracts

What additional details would make you more confident that toll prices are set appropriately?

Studied to show if the price was lowered, would more cars use the roads which would mean the revenue for the operators wouldn't change and traffic in general would be improved. surely there's a tipping point where that would happen, so has anybody

looked into where that is?

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

yes as it looks at all of Sydney's roads as one entity

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

a general lowering of tolls would be better as it's less confusing and applies to everyone. I don't really understand how all the current relief plans work

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

means-tested would be a great start as there are people out there doing it tough who have no other options.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

No real vies other than better signage...the Rozelle interchange was a classic example of the overhead signs not being clear. Point out what is free, not just what is tolled

Do you think this will better inform your decision to use a toll road?

fairness in distance pricing. The Cross City Tunnel and ED represent almost zero value for time saved

What other features would you like to see implemented?

The whole idea of a toll road is to save time, so if there is traffic congestion, there should be some sort of compensation to motorists who end up not saving time. For example, let's say the average time to use the Cross City Tunnel is 3 minutes. There should be a threshold of say, 4.5 minutes after which the toll is reduced and maybe after 5 minutes the road is free. This could be measured by point-to-point ETag reading and would encourage road operators to improve traffic flow

---

## Name: John

### Do you have any feedback on the Interim Report?

The general finding that the setting of tolls seems sometimes arbitrary is supported by hard evidence. For example, I've made a number of request for action/comment from the relevant department and minister on a glaring anomaly in charging motorists for travelling about 12% of the airport to SHB - ie engaging the tollway at the Moore Park tunnel and travelling over the SHB costs the same toll as motorists travelling from Sydney airport to the SHB. Some tollways have split tolls reflecting the actual distance motorists are on the toll-way and others don't - like the one just noted. I have not had the courtesy of a reply despite my inquiry being sent some months ago and again about three weeks ago.

### Do you have any other recommendations you would like the Review to explore?

A fair assessment of appropriate charges and appropriate splits being made to reflect this.

### What are your views on adopting network pricing for toll roads in Sydney?

Seems fairer than case by case rate setting. If properly managed then would be a better system than currently.

### What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Complex pricing models seem to go against the basic goal of keeping tolls as low as possible and taking into account what taxpayers thought was the case - ie governments have responsibility to spend some tax money on providing good transport options for society - roads, public transport and assistance to those who need it.

### Setting network tolls with periodic adjustments?

There should be some structure to increases, and that may mean the total increased cost is not passed on.

### What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

IPART and pricing authorities appear to be jobs for the boys - surely a fair system can be worked out without unnecessary red-tape.

### Having an independent, external dispute resolution function for the toll road industry?

Again, how hard is working out a good system? Proper drafting and thinking these matters through should remove -'leave it to them' approach.

### What are your thoughts on disclosing the full details regarding the setting of toll price?

full details backed by fairness,, common sense and logic - yes.

### What additional details would make you more confident that toll prices are set appropriately?

The result should appear and be fair. Again, have authorities stopped thinking? Act with right motivation and intent.

### Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

The tolling system should be structured to minis costs and everyone should take responsibility - from the government to road builders to users.

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Yes - as long as tolls are controlled and kept to minimum and not become just another taxing mechanism.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Should keep it as simple as possible. Adding bureaucracy just eats up revenue. An option may be to build in some relief via tax system and so keep as simple as possible

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Improved driving experience should just happen as part of government role.

Do you think this will better inform your decision to use a toll road?

Yes

What other features would you like to see implemented?

Issue is to structure a fair system. Concentrate on that.

---

## Name: Nicholas

### Do you have any feedback on the Interim Report?

It is unconstitutional for us to be paying road tolls seeing as we already pay a high price in fuel and vehicle registration taxes

### Do you have any other recommendations you would like the Review to explore?

I have a screenshot of a letter from the rms to ann individual who has exercised his constitutional right to travel freely on NSW roads without having to pay tolls.

I will choose to no longer pay tolls for any vehicle addressed to my residence as it is within my constitutional rights to travel freely as stated on section 92 of the constitution of Australia that trade, commerce and intercourse among the states, whether by means of internal carriage or ocean navigation shall be absolutely free.

### What are your views on adopting network pricing for toll roads in Sydney?

I have a screenshot of a letter from the rms to ann individual who has exercised his constitutional right to travel freely on NSW roads without having to pay tolls.

I will choose to no longer pay tolls for any vehicle addressed to my residence as it is within my constitutional rights to travel freely as stated on section 92 of the constitution of Australia that trade, commerce and intercourse among the states, whether by means of internal carriage or ocean navigation shall be absolutely free.

### What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

I have a screenshot of a letter from the rms to ann individual who has exercised his constitutional right to travel freely on NSW roads without having to pay tolls.

I will choose to no longer pay tolls for any vehicle addressed to my residence as it is within my constitutional rights to travel freely as stated on section 92 of the constitution of Australia that trade, commerce and intercourse among the states, whether by means of internal carriage or ocean navigation shall be absolutely free.

### Setting network tolls with periodic adjustments?

I have a screenshot of a letter from the rms to ann individual who has exercised his constitutional right to travel freely on NSW roads without having to pay tolls.

I will choose to no longer pay tolls for any vehicle addressed to my residence as it is within my constitutional rights to travel freely as stated on section 92 of the constitution of Australia that trade, commerce and intercourse among the states, whether by means of internal carriage or ocean navigation shall be absolutely free.

### What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

I have a screenshot of a letter from the rms to ann individual who has exercised his constitutional right to travel freely on NSW roads without having to pay tolls.

I will choose to no longer pay tolls for any vehicle addressed to my residence as it is within my constitutional rights to travel freely as stated on section 92 of the constitution of Australia that trade, commerce and intercourse among the states, whether by means of internal carriage or ocean navigation shall be absolutely free.

### Having an independent, external dispute resolution function for the toll road industry?

I have a screenshot of a letter from the rms to ann individual who has exercised his constitutional right to travel freely on NSW roads without having to pay tolls.

I will choose to no longer pay tolls for any vehicle addressed to my residence as it is within my constitutional rights to travel freely as stated on section 92 of the constitution of Australia that trade, commerce and intercourse among the states, whether by means of internal carriage or ocean navigation shall be absolutely free.

### What are your thoughts on disclosing the full details regarding the setting of toll price?

I have a screenshot of a letter from the rms to ann individual who has exercised his constitutional right to travel freely on NSW roads without having to pay tolls.

I will choose to no longer pay tolls for any vehicle addressed to my residence as it is within my constitutional rights to travel freely as stated on section 92 of the constitution of Australia that trade, commerce and intercourse among the states, whether by means of internal carriage or ocean navigation shall be absolutely free.

### What additional details would make you more confident that toll prices are set appropriately?

I have a screenshot of a letter from the rms to ann individual who has exercised his constitutional right to travel freely on NSW roads without having to pay tolls.

I will choose to no longer pay tolls for any vehicle addressed to my residence as it is within my constitutional rights to travel freely as stated on section 92 of the constitution of Australia that trade, commerce and intercourse among the states, whether by means of internal carriage or ocean navigation shall be absolutely free.

### Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

I have a screenshot of a letter from the rms to ann individual who has exercised his constitutional right to travel freely on NSW roads without having to pay tolls.

I will choose to no longer pay tolls for any vehicle addressed to my residence as it is within my constitutional rights to travel freely as stated on section 92 of the constitution of Australia that trade, commerce and intercourse among the states, whether by means of internal carriage or ocean navigation shall be absolutely free.

### What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

I have a screenshot of a letter from the rms to ann individual who has exercised his constitutional right to travel freely on NSW roads without having to pay tolls.

I will choose to no longer pay tolls for any vehicle addressed to my residence as it is within my constitutional rights to travel freely as stated on section 92 of the constitution of Australia that trade, commerce and intercourse among the states, whether by means of internal carriage or ocean navigation shall be absolutely free.

### What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

I have a screenshot of a letter from the rms to ann individual who has exercised his constitutional right to travel freely on NSW roads without having to pay tolls.

I will choose to no longer pay tolls for any vehicle addressed to my residence as it is within my constitutional rights to travel freely as stated on section 92 of the constitution of Australia that trade,

commerce and intercourse among the states, whether by means of internal carriage or ocean navigation shall be absolutely free.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

I have a screenshot of a letter from the rms to ann individual who has exercised his constitutional right to travel freely on NSW roads without having to pay tolls.

I will choose to no longer pay tolls for any vehicle addressed to my residence as it is within my constitutional rights to travel freely as stated on section 92 of the constitution of Australia that trade, commerce and intercourse among the states, whether by means of internal carriage or ocean navigation shall be absolutely free.

Do you think this will better inform your decision to use a toll road?

I have a screenshot of a letter from the rms to ann individual who has exercised his constitutional right to travel freely on NSW roads without having to pay tolls.

I will choose to no longer pay tolls for any vehicle addressed to my residence as it is within my constitutional rights to travel freely as stated on section 92 of the constitution of Australia that trade, commerce and intercourse among the states, whether by means of internal carriage or ocean navigation shall be absolutely free.

What other features would you like to see implemented?

I have a screenshot of a letter from the rms to ann individual who has exercised his constitutional right to travel freely on NSW roads without having to pay tolls.

I will choose to no longer pay tolls for any vehicle addressed to my residence as it is within my constitutional rights to travel freely as stated on section 92 of the constitution of Australia that trade, commerce and intercourse among the states, whether by means of internal carriage or ocean navigation shall be absolutely free.



---

## Name: Submission 254028

Do you have any other recommendations you would like the Review to explore?

Buy them back. The government is supposed to work for the public, for me. I never agreed to the privatisation of roads.

What are your views on adopting network pricing for toll roads in Sydney?

I think any idea that keeps public roads in the hands of private organisations is wrong. Buy them back.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

I think any idea that keeps public roads in the hands of private organisations is wrong. Buy them back.

Setting network tolls with periodic adjustments?

Toll roads owners do nothing to fix toll roads. Why are they allowed increase tolls when congestion is getting worse. Road conditions are getting worse. I want a full breakdown on where my toll goes. I want an itemised receipt

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

If they provide itemised items for the reason of toll setting

Having an independent, external dispute resolution function for the toll road industry?

Who pays for it? Will it see an increase in our tolls? Cap the tolls, remove privatisation

What are your thoughts on disclosing the full details regarding the setting of toll price?

Yes, fully itemised, if we're paying some ceo to sit in a different country and do nothing but collect money, we have a right to know and a right to reject the charge

What additional details would make you more confident that toll prices are set appropriately?

Full itemised report. With names and country of residence for employees being paid off the tolls. The government buying them back. They change the law to negatively affect citizens, they can change it to negatively affect foreign infrastructure owners

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why

No, they don't address removing foreign ownership, then they are not good enough

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

They wouldn't have to have toll relief if they didn't sell the roads off. The government doesn't invest in infrastructure in Western Sydney, where the majority of toll payers live, so your noted comment is redundant

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

No, they don't. Because means testing is just a way to financially rape the people who are already paying higher than average taxes. Now you want to tax them more because they work more? Rolls should be lowered across the board. If you didn't sell off the roads, this review wouldn't even happen. And who's paying for this review? The tax payers who you want to means test and charge higher tolls for. But the government will be OK, since these same taxpayers are left to foot their toll charges as well.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Online trip planning is google maps, which we get for free. All the above trash is just another way to say they need to increase tolls and taxes

Do you think this will better inform your decision to use a toll road?

No

What other features would you like to see implemented?

Removing p platers from them. If they can't legally drive the speed limit they shouldn't be on the road, the amount of near misses because a p plater is doing 60km in a 100- 110km zone. Enforce minimum speeds to remove bad and no confident drivers, electronically detect right lane hoggers and fine them.

---

## Name: Submission 254031

Do you have any other recommendations you would like the Review to explore?

Look into How to remove the current tolls all together.

What are your views on adopting network pricing for toll roads in Sydney?

As long as it reduces the cost to all who use

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

I do not agree with distance changing.

Setting network tolls with periodic adjustments?

Tolls should be reduced over time not increased.

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Yes

Having an independent, external dispute resolution function for the toll road industry?

Yes agree

What are your thoughts on disclosing the full details regarding the setting of toll price?

Agree

What additional details would make you more confident that toll prices are set appropriately?

Transparency of contracts.

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

No. Tolls should be scrapped.

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Remove to tolls all together the scheme then won't be required problem solved.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Tolls should removed all together.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Better signage is always good.

Do you think this will better inform your decision to use a toll road?

Yes.

What other features would you like to see implemented?

Removal of all tolls.

---

## Name: Saravanan

Do you have any feedback on the Interim Report?

Satisfactory as it has indeed address most issues with toll fee, lack of competition with toll providers , unreasonable and unaffordable toll increases and traffic congestion

Do you have any other recommendations you would like the Review to explore?

Till the reform is implemented- the toll relief and refund scheme must be simplified - most of us miss out on claiming toll relief or refund because if the current cumbersome administrative process

What are your views on adopting network pricing for toll roads in Sydney?

Satisfactory and meaning full approach - longer distance travelled by the user should not attract unreasonably higher tolls -

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Nil

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Definitely

Having an independent, external dispute resolution function for the toll road industry?

Absolutely necessary

What are your thoughts on disclosing the full details regarding the setting of toll price?

Must be transparent

What additional details would make you more confident that toll prices are set appropriately?

Considering the cost of living , capped toll

Charges for regular users , tax relief and regular subsidies are required

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

Yes - it addresses pricing , congestion, inefficiency via a via distance to cost ratio , effective network tolling , independent authority to monitor tolling principles for review and reform

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Toll relief must be extended as this is independent of the toll pricing . Users are forced to use toll - or punished with toll fares for living in satellite suburbs . The offset is a requirement

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Not sufficient as the cost will still be significant for regular toll users

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Great

Do you think this will better inform your decision to use a toll road?

Definitely

What other features would you like to see implemented?

None

---

## Name: Ambrosu

Do you have any feedback on the Interim Report?

The prices of each toll should be noted, the changes in traffic congestion for parramatta road from when there was no toll on m4 to when the new toll began m4 began as part of the westconnex upgrade.

Do you have any other recommendations you would like the Review to explore?

Previously existing and paid for motorways have been recaptured into toll, m4 is a primary example of this as the toll, should be taken away between church street and homebush bay drive, the changes to the roads were very minor to implement a toll as part of the m4 westconnex expansion.

M5 east toll should be reviewed along with the reintroduction of the toll as part of the M8, this toll was already paid off, and now beyond king georges M5 east is tolled due to M8 upgrade, there has been no significant changes to M5 to put a toll in place, all the roads there were upgraded only to allow an entrance to M8. M5 is still 2 lanes beyond king georges road as it was for the past 15 years.

What are your views on adopting network pricing for toll roads in Sydney?

Reduce all tolls down to \$1 per toll, this would encourage motorists to use toll roads more often as it wouldnt cause an issue of affecting pockets, reduce congestion on non-toll roads and provide more efficiency in operation of vehicles through less fuel use and less pollution.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Should be a set price toll of \$1 per toll road use and get rid of the toll relief scheme as part of it provide the savings back by removing tolls altogether.

Setting network tolls with periodic adjustments?

Toll road usage should be encouraged for commuter efficiency and reduction of congestion, periodic adjustment does not achieve this.

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Yes this would be greag

Having an independent, external dispute resolution function for the toll road industry?

Yes agree this would be good

What are your thoughts on disclosing the full details regarding the setting of toll price?

Yes the public needs to know how these prices are determined

What additional details would make you more confident that toll prices are set appropriately?

Details of costs of building motorways

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

No they dont, toll prices are through the roof and personally I only use toll roads due to urgency, as they dont provide value in everyday commutes

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Yes remove toll relief if tolls are reduced to \$1

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

No, I do not agree, having to switch to different methods of transport to avoid tolls is a waste of time

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Sounds good

Do you think this will better inform your decision to use a toll road?

Nope, as people dont check online each time they drive, they use apps like google maps

What other features would you like to see implemented?

Unsure.



---

## Name: Submission 254038

Do you have any feedback on the Interim Report?

There should be better acknowledgement of the damage that is being done to local businesses along Stoney Creek Road, Arncliffe to Beverly Hills due to the removal of Toll free until Beverly Hills exit. The traffic is so heavy from large trucks that even in late evenings along this alternate toll free route, there is heavy compression braking and truck horns being blasted. The roads are full of pot holes as a result of an excessive amount of heavy trucks. There should be a reinstatement of fee free toll roads from inner city to past Beverly Hills in both directions.

Do you have any other recommendations you would like the Review to explore?

Refunds for whole toll fares when there are complete traffic standstills. It's ridiculous that I would have to pay \$20 to be sitting in the middle of a tunnel/toll road and not going anywhere.

What are your views on adopting network pricing for toll roads in Sydney?

It should be government regulated and lower for all. Current prices are ridiculous.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

It's stupid unless it makes the fares cheaper. Paying \$10-20 to be on a two lane road towards the city is an absolute rip off as it is. Charging extra for trucks and heavy vehicles also seems very discriminatory

Having an independent, external dispute resolution function for the toll road industry?

Good, there should be one. Problem would be the funding for it and the difference between independent and impartial

What are your thoughts on disclosing the full details regarding the setting of toll price?

Yes, heavily needed. Why are they getting so much profit for shit roads?

What additional details would make you more confident that toll prices are set appropriately?

It should 100% be government owned and regulated, it's so bad that they privatised it in the beginning

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

No, it doesn't take into consideration the innocent bystanders, the owners of homes and small businesses that have to live with the avarice of Linktd, seeing extra traffic and heavy vehicles using small local roads.

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Must be extended. Ideally M5 should be toll free up to and including Beverly Hills

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

No. The M5 AND M8 should be toll free up to and including beverly hills. The M4 should be free up to and including Homebush/Olympic Park/Flemington exit.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Better signage to show if the toll road is fully blocked with traffic or not would be great.

What other features would you like to see implemented?

Toll automatic refund for when toll roads are less fast than using non-toll roads.

---

## Name: Submission 254039

Do you have any feedback on the Interim Report?

The report focuses entirety in the wrong direction. The tolls are forced those of let social economic status onto already crowded roads making these roads worse and proving alternative routes that only those of wealthier backgrounds can use, making a reality where the poor are forced to sit for hours on end every week in traffic and the rich simply pushy to skip it, underutilizing these massive roads and over using the alternatives.

Adding more tolls and/or standardizing those that are there (without considering massive price drops) is a huge waste of the peoples time and money, and will only lead to worse congestion for 80% of the population.

Do you have any other recommendations you would like the Review to explore?

Tolls some be entirely scrapped. If these roads where made accessible motorists would begin to use them and traffic on every other road would decrease/improve

The tolls into the city (whose same roads are not tolled on exit) are designed to discourage people to enter the city and encourage them to leave, lessening congestion in the. CBD. If you add tolls to these exits the roads west will become all but inoperable due to traffic build up of people trying to leave the city without paying these ridiculous ransoms.

What are your views on adopting network pricing for toll roads in Sydney?

We already have that, it's called a road tax. We pay taxes due the roads on our insurance, petrol, registration, and income tax, paying again to use certain roads is unfair in so many senses, and needs to be scrapped.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

It's totally horse shit. These roads need to be opened up to the public, not just those with disposable income. Traffic will continue to worsen in all areas of Sydney until this is addressed.

Setting network tolls with periodic adjustments?

These are again, total horse shit. Any plan that continues to charge motorists for these roads is not taking into account that most people in the city cannot afford to use them, forcing 80% of traffic onto roads that simply do not have the capacity to handle it. It is needlessly worsening congestion while creating an alternative where those who can afford it then get to skip that reality

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

This is again, total horse shit. Any plan that continues to charge motorists for these roads is not taking into account that most people in the city cannot afford to use them, forcing 80% of traffic onto roads that simply do not have the capacity to handle it. It is needlessly worsening congestion while creating an alternative where those who can afford it then get to skip that reality

Having an independent, external dispute resolution function for the toll road industry?

Will probably solve absolutely nothing

What are your thoughts on disclosing the full details regarding the setting of toll price?

They should absolutely be made available to the public, as should the names of those responsible for it.

What additional details would make you more confident that toll prices are set appropriately?

There is no way any price set on these roads is done so for the betterment of the driving population, let alone "appropriately".

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

Not even slightly.

Any proposal that continues to charge motorists for these roads is not taking into account that most people in the city cannot afford to use them, forcing 80% of traffic onto roads that simply do not have the capacity to handle it. It is needlessly worsening congestion while creating an alternative where those who can afford it then get to skip that reality

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Is the government has wrapped itself in such a poor position that it cannot waive or cover the price of tolls, it should be forced to entirely cover them indefinitely.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Not even slightly

---

## Name: Submission 254046

Do you have any feedback on the Interim Report?

generally it is heading in the right direction. at least motorcycles are now recognised as small vehicles that do little damage to roads with a multiplier of 0.5.

however, you should go one step further and make motorcycles free, like the most livable city in the world, Melbourne.



What are your views on adopting network pricing for toll roads in Sydney?

Support

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

i recognise the need for tolls and user pays through the PPS, but more transparency of pricing required. not sure about the declining distance concept.

Setting network tolls with periodic adjustments?

should limit adjustments.

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

agree

Having an independent, external dispute resolution function for the toll road industry?

no too much bureaucracy, and taxpayer will end up footing the bill.

What are your thoughts on disclosing the full details regarding the setting of toll price?

some transparency is a good idea but we don't need to know all the detail, too cumbersome and inefficient.

What additional details would make you more confident that toll prices are set appropriately?

would be good to know when the road infrastructure is fully paid for including interest.

just like the original harbor bridge tolls, we knew when it would be fully written off and become free.

in other words, we all recognise the need to pay for the infrastructure but don't want it to be an ongoing cash cow for the investors beyond what is reasonable.

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

in principle yes, a good initiative.

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

if tolls are set through a known framework toll relief should not be necessary.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

see comment above, means testing will add to costs.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

not necessary, keep it simple.

Do you think this will better inform your decision to use a toll road?

No

---

## Name: Steph

Do you have any feedback on the Interim Report?

None

Do you have any other recommendations you would like the Review to explore?

Please ensure that Google Maps and other wayfinding apps do not automatically put people onto toll roads.

What are your views on adopting network pricing for toll roads in Sydney?

Positive

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Approve

Setting network tolls with periodic adjustments?

We need oversight and regular opportunities for review, no one organisation should be in charge, and glitches must be found and remedied ASAP

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Yes

Having an independent, external dispute resolution function for the toll road industry?

Approve

What are your thoughts on disclosing the full details regarding the setting of toll price?

Full transparency is vital

What additional details would make you more confident that toll prices are set appropriately?

Removing profit motivation from the entire system

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

I will have to wait and see upon its implementation

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Phase out, people pay more to live closer to the city

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Sounds reasonable and fairer, as long as the means testing system is not open to abuse

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Doesn't phase me either way

Do you think this will better inform your decision to use a toll road?

I already open using available tools, so no

What other features would you like to see implemented?

N/A



---

## Name: Submission 254050

Do you have any feedback on the Interim Report?

I am greatly relieved to read the findings and recommendations regarding Class A vehicles towing recreational vehicles.

The current situation where I have to use narrow streets through Sydney is intolerable and adds considerable risk and stress just to avoid the M7 and NorthConnex \$110 approx toll fee for a return trip from Canberra to the North Coast.

Do you have any other recommendations you would like the Review to explore?

That the Large Towed Recreational Vehicle Toll Rebate be extended to include interstate vehicles in the interim.

What are your views on adopting network pricing for toll roads in Sydney?

I agree with the recommendations.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

I agree with the findings and recommendations.

Setting network tolls with periodic adjustments?

None

What are your thoughts on IPART involvement in setting toll prices would you see this as a fairer approach?

Yes

Having an independent, external dispute resolution function for the toll road industry?

Essential.

What are your thoughts on disclosing the full details regarding the setting of toll price?

None

What additional details would make you more confident that toll prices are set appropriately?

None

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

Yes as there appears to have been a great deal of effort made to find a fairer system with reduced toll costs for most toll road users.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Yes, excellent proposal

Do you think this will better inform your decision to use a toll road?

Yes

---

## Name: Submission 254051

### Do you have any feedback on the Interim Report?

Interim report should emphasize following points

1: In order to reduce toll road dominance of Transurban , we should improve conditions of toll free roads. This will give people good option to balance the cost imposed by these companies. For a example roads condition on Parramata road is below even road condition you would find in developing nations. Melboure is a good example of keeping toll free roads in good conditions and on par with toll roads

2: toll companis should reduce toll rates when they reduce promised speed limits due to planed work. At the moment M7 charges full charge even with 80 kmph speed imposed dues to the road work.

### Do you have any other recommendations you would like the Review to explore?

Interim report should emphasize following points

1: In order to reduce toll road dominance of Transurban , we should improve conditions of toll free roads. This will give people good option to balance the cost imposed by these companies. For a example roads condition on Parramata road is below even road condition you would find in developing nations. Melboure is a good example of keeping toll free roads in good conditions and on par with toll roads

2: toll companis should reduce toll rates when they reduce promised speed limits due to planed work. At the moment M7 charges full charge even with 80 kmph speed imposed dues to the road work.

What are your views on adopting network pricing for toll roads in Sydney?

1: should reduce price based on the number of year in operation 2: peopl should pay less when they use more

3: Car registration tax should be reduced , based on usage of toll roads

**What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.**

1: should reduce price based on the number of year in operation

2: peopl should pay less when they use more

3: Car registration tax should be reduced, based on usage of toll roads

---

## Name: Submission 254053

### Do you have any feedback on the Interim Report?

Toll roads were actually assets paid for by taxpayers and then we are 'double charged' for the benefit of private companies. Roads that have already been paid for have then been 'upgraded' for the benefit of tolling companies to charge motorists - this is corrupt. For journeys where there is no reasonable public transport alternative, charging tolls is unethical as it penalizes under-served communities. Tolls are increasing the financial burden on key workers (childcare, teachers, healthcare, aged care, sanitation), emergency services workers and critical volunteers of all types. This is a deterrent to undertaking work on which the people of NSW depend, for a sector of the workforce who are un/poorly-paid.

People with disabilities and caring responsibilities often cannot use public transport and should not be charged tolls. The tolling companies have monopolies and this is really bad for citizens and should be changed.

### Do you have any other recommendations you would like the Review to explore?

Remove tolling for journeys where there is no reasonable public transport alternative. Provide a tolling refund system for key workers (paid and volunteer) and for people with disabilities and their carers.

### What are your views on adopting network pricing for toll roads in Sydney?

It must not be used to place further burdens on vulnerable groups. Low SEC communities generally do not have good public transport, and should not be penalized as they have no transport alternative. Tolling charges should reflect the impost on the network- larger, more damaging vehicles should pay more. Trucks and SUVs should pay more, with some form of discount for EVs to incentivize decarbonization. The smallest cars and motorbikes should pay the least and a discount for EVs should be applied.

### What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Often the people with shorter journeys live closer to jobs and services and are from higher SEC groups. Whilst this system is simpler, it may place the largest burden on key workers and those society depends on for essential services.

Given the current housing crisis people can no longer relocate to be closer to work and education, especially as the salaries of the jobs we most need are often low. If this policy is crudely implemented we may end up with people finding work in certain areas completely unaffordable.

### Setting network tolls with periodic adjustments?

This needs to be done thoughtfully, and peak and off-peak pricing may be helpful BUT the unintended consequences must be considered

### What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Infrastructure Partners Australia becoming involved in price setting may be helpful BUT they have vested interests in new development. There needs to be involvement from representatives of people with disabilities, key worker representatives and Councils in areas under-served by public transport. These are the best sources of advice to help avoid unintended consequences of the eye-watering tolling costs

Having an independent, external dispute resolution function for the toll road industry?

A good idea.

What are your thoughts on disclosing the full details regarding the setting of toll price?

Brilliant - there should always be transparency in everything government does

What additional details would make you more confident that toll prices are set appropriately?

Full disclosure of any relationships, kickbacks and incentives offered by toll operators to government or staff during previous negotiations, and a requirement for full transparency in future.

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

No - due to having forgotten to address all of the issue I have already outlined

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Toll relief may need to be extended to the cohorts that have been ignored, who we are finding are relocating, quitting volunteering and finding work unaffordable in certain areas due to the toll burden

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Means tested toll relief may be a big help, toll-free travel for some cohorts is needed AND should always apply to our volunteers we depend on: SES, Fire, SLS, as we are finding many can't afford to do this critical work anymore

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

This could be a big help

Do you think this will better inform your decision to use a toll road?

Yes

What other features would you like to see implemented?

Reduced tolls for less polluting vehicles

---

## Name: Monzur

Do you have any feedback on the Interim Report?

Yes.

Toll should not be daily more than

\$10 Should be declining based on distance Should be peak, shoulder off-peak

What are your views on adopting network pricing for toll roads in Sydney?

Network pricing should be the way to go

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Network Tolling B (with subsidy)

Setting network tolls with periodic adjustments?

Yes

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Yes

Having an independent, external dispute resolution function for the toll road industry?

Yes

What are your thoughts on disclosing the full details regarding the setting of toll price?

Pricing should be fair and transparent

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

Mostly

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

I am open to this idea

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Means-tested will make it really complex.

Tolls should be there, for everyone in fair and equitable way.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

I am open to this idea

Do you think this will better inform your decision to use a toll road?

Yes

What other features would you like to see implemented?

peak, shoulder, off-peak pricing

---

## Name: Submission 254067

Do you have any feedback on the Interim Report?

I'm highly in favour of the proposal to create State TollCo to manage the system.

The road tolling should be fair and equitable across Sydney and agree that the declining distance-based charges are the appropriate mechanism combined with peak and off peak.

User-group specific tolls make sense to me, and would like to add that hybrid- vehicles or EVs should be in a specific user group, and provide with significantly lower rates to drive take up. Additionally shared vehicles like GoGet or Uber Carshare should also be given preferential treatment as a way to reduce car ownership.

What are your views on adopting network pricing for toll roads in Sydney?

Very supportive

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Very supportive

Setting network tolls with periodic adjustments?

Very supportive

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Very supportive

Having an independent, external dispute resolution function for the toll road industry?

Very supportive

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Toll relief should be phased out. It appears there is low uptake and tolls should be adjust and revised based on in market tests to find the ideal tolling level by user group and day part.

What other features would you like to see implemented?

As per previous comment - incentivise hybrid vehicles and EVs as well car share platforms to reduce total number of cars on the road,.

---

## Name: Matt

Do you have any other recommendations you would like the Review to explore?

Motorcycle tolling.

It is grossly unfair and needs to be addressed. The automatic number plate reading and account details can be used to charge a fair toll for motorcycles.

What are your views on adopting network pricing for toll roads in Sydney?

I avoid toll roads as they should be free.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

All roads should be free.

Setting network tolls with periodic adjustments?

All roads should be free.

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

All roads should be free.

Having an independent, external dispute resolution function for the toll road industry?

All roads should be free.

What are your thoughts on disclosing the full details regarding the setting of toll price?

All roads should be free.

What additional details would make you more confident that toll prices are set appropriately?

All roads should be free.

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

All roads should be free.

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

All roads should be free.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

All roads should be free.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

All roads should be free.



Do you think this will better inform your decision to use a toll road?

All roads should be free.

What other features would you like to see implemented?

All roads should be free.

---

## Name: Submission 254079

Do you have any feedback on the Interim Report?

I strongly support the findings and recommendations of the report, and hope that government will accept and implement ALL of the recommendations.

Do you have any other recommendations you would like the Review to explore?

Future road pricing schemes and pricing options. I.E what will future road pricing schemes look like? How can we continue to disincentivise driving and prioritise Public transport or off-peak driving (the latter links with the existing findings in the report.

Better ways for Toll information to be displayed. Potentially electronic video/information signs before toll entries explaining the cost, expected travel times/benefits etc. An app that allows people to MORE EASILY (the current websites are hard to use) tolls, but also see in live time predicted time savings but also alternative routes

What are your views on adopting network pricing for toll roads in Sydney?

I strongly support the implementation of a consistent and fair network price. The further you travel, the cheaper it should be. But it should be consistent across all motorways, easy to understand, and communicated easily.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

This is more fair. Shorter trips which may be achievable on Public transport should be penalised if they are driven. those living the furthest away from their destination should pay less as the alternatives are reduced.

Setting network tolls with periodic adjustments?

Completely agree and support. They should theoretically own the roads...

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Should always be the case. Independent and fair. based on evidence rather than profit or bottom lines.

Having an independent, external dispute resolution function for the toll road industry?

100%. If Transurban has disputes, they are entitled to fair dispute resolution, but this should also be the case for road users.

What are your thoughts on disclosing the full details regarding the setting of toll price?

Transparency is needed for users to have faith and trust in the system

What additional details would make you more confident that toll prices are set appropriately?

Actual costs to build the road, including contingency's, interest etc. I.E how much did the road cost, how long will we be paying tolls and then how much profit is appropriate

**Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.**

The link back to user benefit is good. I think the new proposed principles are good and should be implemented (and any current and future toll operators should be signatories

/ sign to agree of the principles.

**What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?**

Toll Relief needs to be targeted, and in a manner that it should not be rebated BACK to Transurban I.E spend X amount and get X back. All this is doing is encouraging more driving and Transurban/Toll operators are getting more money. Government is essentially double gifting to operators.

The M5 scheme is really good and should be expanded where relevant and means tested to a degree. However 'means' testing does not always work well. Simply because someone earns over \$100K a year does not mean they're sitting pretty. there are many other factors.

**What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?**

Yes and no. if a more consistency network pricing scheme were introduced, these might work. but all the proposed reforms and recommendations need to happen in tandem with each other to ensure the best outcomes.

How toll relief is implemented needs to be balanced with any future broader road pricing and congestion charging schemes are implemented (which I am also very supportive of)

**What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?**

Definitely needed. it is currently too confusing and too hard to get information, plan trips and have transparency on how it all works and is managed

**Do you think this will better inform your decision to use a toll road?**

Yes. I can make better decisions.

**What other features would you like to see implemented?**

Broad based road pricing reform. Remove excise tax and have a per km charge, and also CBD cordon pricing I.E demand-based tolls to enter the city (cheaper when less busy). Should be applied for major centres where Public transport is a viable option (Parramatta, City CBD, Liverpool, Blacktown etc).

Cross City tunnel should also be free to encourage cars to go under the city rather than through

---

**Name: Arif**

Do you have any feedback on the Interim Report?

The new toll on M5 from King Georges road to marsh street should be taken off. There was no tolls on this road and tunnel and there is no change to the these tunnels. Why these new tolls?. It should be taken off immediately.

Do you have any other recommendations you would like the Review to explore?

We pay Rego, which should cover the cost of all roads and services. There should be no toll and if there is it shouldn't be no more than \$3

What are your views on adopting network pricing for toll roads in Sydney?

There should be no tolls.

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Yes

Having an independent, external dispute resolution function for the toll road industry?

Yes

What are your thoughts on disclosing the full details regarding the setting of toll price?

They should do this

---

## Name: Richard

Do you have any feedback on the Interim Report?

Award toll road contracts has been too secretive.

One company should never have been allowed to dominate and control the toll road landscape.

Setting up a toll gathering entity to merely pay out the toll road owner is a bandaid solution.

Do you have any other recommendations you would like the Review to explore?

For about \$40Billion Transurban should be compulsorily acquired by the Federal and State Govts funded through the Future Fund (which has over \$200billion in assets) or via a govt owned entity which can borrow the money overseas at a rate lower than Transurban can get commercial borrowings.

Motorists and business can then be charged lower tolls, enough to cover the repayments and maintenance. This would lower the inflation and the cost of living.

What are your views on adopting network pricing for toll roads in Sydney?

Yes

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Yes

Setting network tolls with periodic adjustments?

Bandaid solution which still requiries excess amounts being paid to the toll road company Transurban

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Bandaid solution compared to nationalising the toll roads and charging much less for tolls

Having an independent, external dispute resolution function for the toll road industry?

Yes

What are your thoughts on disclosing the full details regarding the setting of toll price?

Yes

What additional details would make you more confident that toll prices are set appropriately?

Nationalise Transurban @ \$40Billion paid for via the Future Fund

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

No

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Nationalise Transurban to reduce the toll charge

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

No

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Bandaaid solution

Do you think this will better inform your decision to use a toll road?

No

What other features would you like to see implemented?

Motorists better informed

---

## Name: Jonathan

### Do you have any feedback on the Interim Report? "

Specifically, the Review will consider the appropriate structure and level of tolls for the future having regard to their efficiency, fairness, simplicity and transparency, the historical concession agreements with providers, and the interface with all modes of transport."

The review has not considered the vision set in Future Transport for a NSW that moves by public transport, walking, and cycling as the primary means of getting around. As a result, most of the analysis in the document has not considered the wider network implications, and therefore has not adequately addressed "all modes of transport". It also needs to consider the goal of stabilising VKT on the network.

This has resulted in a few faulty assumptions around proposed pricing of the network.

The key issue is the proposed infrastructure charge. While this is being proposed to address a "range of factors" p16, it does shortchange the biggest factor of all - the motorways are part of a network, and the benefits of use of the motorway network fall equally on active (drivers) and passive (locals who use surface streets) users.

The infrastructure charge distorts the cost of using some parts of the network relative to others, such that there remains large imbalances in fairness across the network. This infrastructure attaches cost to the construction project of a section of motorway, but the value of the motorway network is in the whole, so charging different amounts based on the challenges of delivering the project many years ago does not make sense.

It would be fairer to charge a flagfall for access to the network that scales to a higher cost based on the quality of available alternatives to the motorway network. In the east, there is plentiful public transport and better active transport connectivity so driving on the motorway network should be a last resort, with a high flagfall charge. If you join from the west, where poor planning has made the motorway one of a handful of choices, the charge should be lower. The flagfall can be calculated on where a user enters and exits the network to ensure fairness.

Government should move away from PPP as a model. The most successful entities in the private sector in the 21st century are those that are most vertically integrated

- with full control of the product. With a product as important as the transport network, can we really afford to be ceding control to a private company?

There is much talk about sovereign risk in relation to toll networks, but the biggest risk of all is allowing 195 billion dollars to be sent to Motorway operators and shareholders. Is this imagined reputation worth 195 billion dollars? What could we do with all that cash staying in the local economy going to more productive uses?

### Do you have any other recommendations you would like the Review to explore?

Consider the interaction between motorway tolling and use of surface roads more strongly.

Consider where we actually want private vehicles to be in the city i.e. on motorways and out of local streets and places.

Consider the availability of viable alternatives more strongly.

Consider profit sharing motorway profits to public and active transport projects that provide alternatives.

Be bold. Do not let NSW suffer at the behest of a multinational corporation.

**What are your views on adopting network pricing for toll roads in Sydney?**

Yes, strongly agree. All roads on or contiguous with the tollway network should have a network based charge.

**What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.**

Declining distance based charge seems fair and incentivises the right journeys.

The infrastructure charge is pseudo science to please motorway operators and does not incentivise efficient use of the network, it just further distorts and obfuscates the pricing of the network. It is not simple, not transparent, and not fair. The tollways are used as a whole, not individual projects, the pricing should reflect this.

Pricing of the network should consider the availability of alternatives on public transport and active transport.

Pricing of the network in specific locations should consider the value of the streets being bypassed too - Cross City Tunnel needs to be cheap, the streets above are too valuable to have filled with cars. CCT should be the default choice for east west travel through the CBD, not just the choice for those wanting to save 5 minutes.

Travel time savings really need to be investigated properly and a modern appraisal done. There are a minority of journeys where 5 minutes makes a difference, the majority can be slow and flexible. When going to a friend's house on the other side of town, will it be better to come with a cheese platter 5 minutes late, or on time but with nothing because you spent the money on tolls instead. The travel time saving calculations are overly relied on and poorly thought through.

**Setting network tolls with periodic adjustments?**

Yes. Need to consider all users, not just direct users.

**What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?**

Yes

**Having an independent, external dispute resolution function for the toll road industry?**

Yes

**What are your thoughts on disclosing the full details regarding the setting of toll price?**

Absolutely must

**What additional details would make you more confident that toll prices are set appropriately?**

proper valuation of travel time savings - currently it is massively over inflated, which is why people use surface roads in lieu of the network. This should be transparent.



Please consider as this is a network, the beneficiaries are not just the users. Every vehicle off surface roads and onto the motorway networks is an opportunity to reduce traffic on surface roads and reallocate roadspace to more efficient means of movement, like public transport, walking, and cycling.

**Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.**

No. with 195 billion in tolls being paid, it seems like it could be cheaper to make the assets public and properly reform pricing.

**What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?**

Toll relief should not be something we do generally.

**What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?**

There should be a principle about not inducing further total VKT in NSW in line with Future Transport.

**What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?**

All of this should be pointing people to available alternatives of public transport, walking, and cycling.

Any information needs to be in Google Maps and Apple Maps. People aren't interested in using more than one app for journey planning.

**Do you think this will better inform your decision to use a toll road?**

slightly

**What other features would you like to see implemented?**

Instead of making the tags beep, they could speak the charge as it goes through.

---

## Name: Bill

Do you have any feedback on the Interim Report?

No

Do you have any other recommendations you would like the Review to explore?

I have a motor home which is charged as a heavy commercial vehicle even though it is neither heavy nor commercial. My objections to being charged thus have been consistently ignored

What are your views on adopting network pricing for toll roads in Sydney?

Probably a good idea

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

No views on this topic

Setting network tolls with periodic adjustments?

Don't know enough about this to comment

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Don't know

Having an independent, external dispute resolution function for the toll road industry?

Great idea

What are your thoughts on disclosing the full details regarding the setting of toll price?

Great idea

What additional details would make you more confident that toll prices are set appropriately?

Not enough categories of vehicles

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

Don't know

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

It would be better to phase out tolls altogether

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Don't know, but as a person on a pension, toll relief would be good

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Great idea to use information technology for the benefit of users

Do you think this will better inform your decision to use a toll road?

I don't use toll roads at all because I am charged at what I consider to be an illegal rate

What other features would you like to see implemented?

We don't need speed limit reminders every 100 meters or so in the tunnels

---

**Name: Darryl**

Do you have any other recommendations you would like the Review to explore?

I am retired with a Fiat motorhome less than 7 m long

only 2.7 m high

Car licence to drive

Yet charged commercial vehicle rates & have to apply for a rebate everytime ( a real pain )

As above satisfies toll nsw own criteria ?? WHY ?? OH WHY MONEY SPINNER ?? Why not register [REDACTED] on the system as a normal Fiat Ducato van.

What are your thoughts on disclosing the full details regarding the setting of toll price?

YES

What additional details would make you more confident that toll prices are set appropriately?

Upgrade computer system to accurately process vehicles incorrectly being charged commercial rates & putting the onus on the customer to resolve !!!

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Lower tolls as they mature

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Lower tolls as they mature

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Not necessary

Do you think this will better inform your decision to use a toll road?

No

What other features would you like to see implemented?

More safety bays

---

## Name: Submission 254266

What are your views on adopting network pricing for toll roads in Sydney?

Good

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Good

Setting network tolls with periodic adjustments?

Good

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Maybe

Having an independent, external dispute resolution function for the toll road industry?

Good

What are your thoughts on disclosing the full details regarding the setting of toll price?

Good

What additional details would make you more confident that toll prices are set appropriately?

They are too high for commuters

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

N/A

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

First commuters need to feel better in terms of increasing living costs.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

No

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Good

Do you think this will better inform your decision to use a toll road?

Maybe

What other features would you like to see implemented?

M5 tunnel toll needs to be removed

---

## Name: Cihan

### Do you have any feedback on the Interim Report?

#### Recognition of the High Cost of Tolls:

The Interim Report comprehensively acknowledges the concerns of Sydney's motorists regarding the high cost of tolls, noting that tolls amount to around \$2.5 billion annually for Sydney's motorists. This significant expense contributes to the cost of living pressures faced by individuals and businesses in Sydney. The report's findings align with the general sentiment that tolls are perceived as overly expensive and unfairly burden users, particularly those in Western Sydney (Findings 8 and 9).

#### Toll System Complexity and Inefficiency:

The Report identifies the complexity, inefficiency, inequity, and unfairness of the current tolling system due to the lack of a unified pricing system (Finding 5). This complexity not only exacerbates the financial burden on motorists but also hinders the efficient management of traffic and road use in Sydney.

#### Toll Road Monopoly and Its Impact:

Transurban's dominance in the provision and operation of toll roads in Sydney is highlighted as a significant issue (Findings 10, 11, and 12). This monopoly position has raised concerns regarding competition and the possibility of inflated toll costs, which could further contribute to the high cost of living for Sydney residents.

#### Proposals for Reform:

The Interim Report proposes a series of reforms aimed at addressing these issues, including the introduction of a new network system of tolls, the establishment of a government-owned entity (State TollCo) for toll management, and the oversight of toll settings by an independent body (Recommendations 1-4, 16, and 19). These reforms aim to create a fairer, more transparent, and efficient toll system that could mitigate the financial impact on motorists.

#### Recommendations for Immediate Attention:

**Fairer Tolling Structure:** Implementing a declining distance-based charge as part of the new tolling structure to make it fairer for those traveling longer distances, particularly benefiting residents in Western Sydney (Recommendation 3).

**Transparency and Oversight:** Ensuring greater transparency in toll setting and operations, alongside independent oversight to build public trust and ensure tolls are set fairly (Recommendations 27 and 19).

**Addressing Monopoly Concerns:** Re-evaluating the competitive landscape of toll road operations to prevent any monopolistic practices that could lead to higher tolls (Recommendations 21-23).

#### Conclusion:

The findings and recommendations of the Interim Report align closely with the concerns regarding the high cost of tolls in Sydney. The proposed reforms, if implemented effectively, have the potential to address these concerns by creating a more equitable, transparent, and efficient tolling system. It is crucial for stakeholders, including the public, to engage actively with the reform process to ensure that the final outcomes significantly alleviate the toll burden on Sydney's residents, thereby contributing to a more manageable cost of living.





---

## Name: Daws

Do you have any feedback on the Interim Report?

I believe that the proposal as published is an equitable solution to the current inequality that applies to motorhomes as compared to towed vehicles.

Do you have any other recommendations you would like the Review to explore?

I would recommend that the height of 3.3m be increased to 3.5m, as many motorhomes have air conditioners on top of their roofs, which increase their height by approximately 0.15-0.2m

This increase in height would ensure that the vast majority of motorhomes would be included in the new category.

Other than that one change I believe that the proposal is an excellent and elegant solution.

What are your views on adopting network pricing for toll roads in Sydney?

No comment

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

No comment

Setting network tolls with periodic adjustments?

No comment

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

I agree with this approach as being fairer.

Having an independent, external dispute resolution function for the toll road industry?

I agree with this approach.

What are your thoughts on disclosing the full details regarding the setting of toll price?

I agree fully with a transparent approach.

What additional details would make you more confident that toll prices are set appropriately?

Ensuring an independent review with a robust governance process.

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

Yes

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

I do not agree with the phasing out of toll relief, as for everyday users the cost of tolls is a material burden on their cost of living.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Unable to say at this time.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

I do not believe that this will make a material difference to the everyday user.

Do you think this will better inform your decision to use a toll road?

No

What other features would you like to see implemented?

No comment at this time.

## Name: Submission 254586

Do you have any feedback on the Interim Report?

The Interim Report is a small and gentle step in the right direction, but seems constrained to the paradigm of tolling, that tolls are necessary and the basis upon which certain roads were selected for tolling was valid.

Imagine if your doctor added some new chairs to the waiting room, but you had to pay to use them, with little other logic than that they are new and more comfortable, perhaps more likely to be seen sooner, and cost the doctor a lot. That's where we're at, how to make paying for waiting room chairs fairer, when we shouldn't be paying that way at all!

What is really required is a more holistic analysis of the appropriateness and necessity for road use charging, also noting the growing proportion of electric vehicles eroding the fuel tax base. Maybe through rego charges.

Do you have any other recommendations you would like the Review to explore?

In the interim, just add 30c excise per litre to transport fuels (collect \$2.2b/year) and suspend all toll collection. The whole state would complain for a while but then every road user would be contributing proportionately to the cost of all road road maintenance and operations, including paying out Transurban. Reanalyse road use and needs after allowing enough time to settle into a new equilibrium.

Side benefit: marginal disincentive to drive, and maybe (with increased rego costs) to have personal cars at all, which wouldn't be a bad thing given the emissions reductions aspirations, the good public transport and the incredible waste of so many cars parked, especially on roads, for most of their lives.

P.S. Of course people in regional areas would complain the most, due to the distances they drive and without the savings of not paying tolls, but that's just the imbalance that this would correct: those lightly used long country roads are the most inefficient public assets!

What are your views on adopting network pricing for toll roads in Sydney?

This is the wrong question, when tolling should be discontinued completely.

More holistic network pricing is a step in the right direction and makes much more sense than the current patchwork, where one piece of road is free and another tolled, on an arbitrary or circumstantial basis, but why stop at highways - extending the logic would apply a toll on every single road in the city.

Or none. The question assumes tolls are necessary at all, overlooking the regressive inefficiency of tolls and their disproportionate impact on those using a tolled road rather than a free alternate route.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Again, the wrong question, when it would make more sense to abolish tolls altogether.

Any pricing system won't be consistently understood, and I'd suggest that declining rates are harder to understand and mentally model, perhaps better expressed as analogous to volume or bulk discount.

That said, rates that decline by distance travelled would be less unfair for those who need to travel long distances, and seem simpler and more efficient than the current state.

#### Setting network tolls with periodic adjustments?

This is a very appropriate role for central co-ordination by the State, or an entity accountable to the state (although I didn't get to fully understand why a separate entity is absolutely necessary.)

#### What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

This seems to make sense, at least until tolls are discontinued altogether.

#### Having an independent, external dispute resolution function for the toll road industry?

This seems to make sense, at least until tolls are discontinued altogether.

#### What are your thoughts on disclosing the full details regarding the setting of toll price?

Honestly, not really necessary for most of the public, moreso for internal accountability.

But the whole construct is artificial and arguably arbitrary - the important issue is not whether that stretch of road is tolled at \$7.20 or \$7.40, but why is it tolled at all, when the adjacent stretch of road is not.

If McDonalds was giving Cheeseburgers for free and charging \$9 for a Big Mac, how important is it understand what proportion of the carpark cleaning and maintenance costs are attributable to that Big Mac, or not?

#### What additional details would make you more confident that toll prices are set appropriately?

Toll prices of zero would be appropriate for use of public infrastructure.

Or don't attempt to relate the price to the cost at all, just go with a congestion charge London style and be clear that it's a price premium or economic disincentive to use roads or enter zones at busy times, same as train fares are more during peak hours.

#### Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

No, because the Principles accept the premise that tolls are necessary, and that user- pays is an appropriate way for government to meet privately financed construction costs.

The whole approach needs to be lifted to how to finance the whole road infrastructure network, regardless of who paid for which stretch.

#### What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Yes, phase out toll relief. (Easier if tolls are abolished too.) It is just another layer of distorting inefficiency. In the interim, just reduce all current tolls by 20% rather than reimbursing 20% of the users.

#### What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Network wide and not free make most sense here, so just apply a 20% reduction to all toll collection rates and avoid the complications, until tolls are phased out completely.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Sounds good, but perhaps expensive, representing additional inefficiency avoided by abolishing tolls completely.

Do you think this will better inform your decision to use a toll road?

Probably not. I am in the fortunate position where I can afford to take the best route without considering tolls.

What other features would you like to see implemented?

Reduce driver distraction of worrying or wondering about tolls by abolishing them.

---

## Name: Michelle

Do you have any feedback on the Interim Report?

Need to speed up the process of the review please.

Do you have any other recommendations you would like the Review to explore?

For people who live in Western Sydney, reduce pressure on cost-of-living by reducing tolls ( on weekends, early morning hours, etc)

What are your views on adopting network pricing for toll roads in Sydney?

If it benefits roads users AND cuts road congestion, then yes I am OK with it.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Yes all good

Setting network tolls with periodic adjustments?

Yes please; look at times of day and usage of roads.

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Not sure, will need to look into it more.

Having an independent, external dispute resolution function for the toll road industry?

Yes

What are your thoughts on disclosing the full details regarding the setting of toll price?

Yes please

What additional details would make you more confident that toll prices are set appropriately?

Looking at road usage times of day and frequency. Asking for a rebate is too hard, simply make adjustments based on number plates, surely we can do that.

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

Not sure

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

I don't get a toll rebate so this doesn't apply to me.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Not sure

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Yes, I like this idea,

Do you think this will better inform your decision to use a toll road?

Yes it will

What other features would you like to see implemented?

Nothing so far

---

**Name: Blake**

Do you have any feedback on the Interim Report?

The report is correct that toll prices are too high. They're ridiculous.

What are your views on adopting network pricing for toll roads in Sydney?

Reduce toll costs

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Reduce toll costs

Setting network tolls with periodic adjustments?

If the periodic adjustments are downward, sounds great

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Yes

Having an independent, external dispute resolution function for the toll road industry?

Yes

What are your thoughts on disclosing the full details regarding the setting of toll price?

Sounds good

What additional details would make you more confident that toll prices are set appropriately?

Disclosure of profit margins on toll roads, and limits on this (i.e. tolls can not exceed maintenance costs after a profit of 100% has been made)

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

They don't adequately address the main issue - toll prices are too high!

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

The government shouldn't be spending on toll relief, the companies owning the toll roads should. It's their problem.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Those are good things to have, but don't address the main issue

Do you think this will better inform your decision to use a toll road?

Yes

What other features would you like to see implemented?

Lower tolls





---

## Name: Benjamin

### Do you have any feedback on the Interim Report?

#### Network Tolling and Declining Distance-Based Pricing:

##### Feedback on Recommendations 2 and 3:

Adopting network tolling with declining distance-based pricing is innovative and fair, offering a transparent and straightforward billing method. This approach promotes efficient road use and could serve as a model for future infrastructure funding.

#### Equity and Accessibility through Toll Relief:

##### Feedback on Recommendation 5:

Implementing toll relief that considers alternative transport options is thoughtful. It provides necessary relief while maintaining fair pricing signals, showcasing sensitivity to diverse user needs.

#### Innovations in Toll Management:

##### Feedback on Recommendation 6:

Introducing flexible pricing, including peak/off-peak and dynamic pricing, is a forward-thinking strategy that can manage congestion and optimise road use efficiently.

#### Enhancing Public Transportation Accessibility:

##### Feedback on Recommendation 12:

Simplifying toll exemptions for public buses is key to improving public transport efficiency and accessibility, encouraging sustainable travel methods.

#### Fairness in Tolling:

##### Feedback on Recommendation 13:

Consistent two-way tolling ensures equity and transparency, ensuring all road users contribute fairly, which is crucial for public trust.

#### Governance, Transparency, and User Experience:

##### Feedback on Recommendations 16, 17, and 22–28:

Focusing on improving management, promoting competition, enhancing transparency, and customer satisfaction is vital. Measures like establishing a State TollCo and improving the retail experience for motorists will boost user satisfaction and trust.

Do you have any other recommendations you would like the Review to explore?

I was disappointed to see no concessions for car share services like GoGet in the interim report. Car sharing reduces traffic and supports environmental goals by promoting resource efficiency. Incentivising car share users on toll roads acknowledges these benefits and encourages a shift towards more sustainable transportation methods. It's important that toll policies reflect and support these positive community impacts.

What are your views on adopting network pricing for toll roads in Sydney?

I would welcome this.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

I would welcome this.

Setting network tolls with periodic adjustments?

I would welcome this.

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

I would welcome this.

Having an independent, external dispute resolution function for the toll road industry?

I would welcome this.

What are your thoughts on disclosing the full details regarding the setting of toll price?

I would welcome this.

What additional details would make you more confident that toll prices are set appropriately?

Publicly disclosing the details of the arrangement should be sufficient.

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

Mostly, see my previous comments about car sharing services.

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

I would support this as it distorts the market.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

I would welcome this.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

I would welcome this.

Do you think this will better inform your decision to use a toll road?

Yes

What other features would you like to see implemented?

Real time toll pricing in third party apps like Apple Maps.

---

## Name: Forugh

Do you have any feedback on the Interim Report?

The interim report does not adequately address the current setup of toll roads and how motorists are almost forced into using it, without much time to react and poor signage. M8 is a great example.

Do you have any other recommendations you would like the Review to explore?

Tolls are too expensive, and despite government promises that tolls won't be back at M4, here we are paying more tolls than ever before. Which instead of encouraging traffic flow, discouraged them from using the M4 and opting for Parramatta road use and congestion.

What are your views on adopting network pricing for toll roads in Sydney?

Network pricing or per Km charge might be a better alternative than current set pricing

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

I think the M7 method of pay by distance travelled might work well.

Setting network tolls with periodic adjustments?

This might work, but don't understand what periodic adjustments mean? Annually?

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Definitely IPART would make it more transparent and well informed decision making process

Having an independent, external dispute resolution function for the toll road industry?

This is just another level of bureaucracy, IPART/Treasury can get an independent review done using existing audit service providers

What are your thoughts on disclosing the full details regarding the setting of toll price?

This is a good idea.

What additional details would make you more confident that toll prices are set appropriately?

Transparency of price setting and usage of revenue raised, similar to how the Harbour Bridge is reported by TfNSW.

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

Single tolls company needs to be addressed

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

There should be some relief for businesses and regular toll users.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

That is too cumbersome and creates more bureaucracy. Eg the pensioners don't use tolls much.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Currently signage and Google maps don't help motorists

Do you think this will better inform your decision to use a toll road?

Potentially

What other features would you like to see implemented?

Prices need to be displayed and collaboration with Google maps to make them available as part of trip planning

---

## Name: Larry

Do you have any feedback on the Interim Report?

read the recommendations below

Do you have any other recommendations you would like the Review to explore?

As I live in the Northern Rivers Area and I have a caravan and if I wish to travel south via the Sydney Area I was charged as a semi trailer now I know that the Government wanted to get the trucks off Pennant Hills RD but you should give a discount on the toll charge. Now as I had said that I have a caravan and as I have previously lived in Sydney I know that I can take the arterial roads around the metro area only to put up with traffic and the traffic lights if that is what I had to do to save the cost that I have been charged before and DID NOT get any reduction of price when I applied for some rebate as I am a pensioner cost is important

What are your views on adopting network pricing for toll roads in Sydney?

with the cost of living going up it should be coming down. Also it has been a long time since the Harbour Bridge had been completed and we are still paying for it. Apart from the upkeep

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

I do find that the time it takes to transverse the motorway around the metro area but to simplify the toll charges instead of having 4 different tolls to just go around Sydney.

Setting network tolls with periodic adjustments?

I do agree that general maintenance needs to be carried out from time to time but do we have to pay such high prices

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

I think it would be a good thing to set the toll prices to a much fairer setting

Having an independent, external dispute resolution function for the toll road industry?

Yes but to keep the cost down

What are your thoughts on disclosing the full details regarding the setting of toll price?

Yes that would give everybody a chance to see where the ripoff is

What additional details would make you more confident that toll prices are set appropriately?

Well to at least look after travelers to use the tollways rarely

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

No I donot

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

No I do not agree on phasing out toll relief.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

As I do not live in Sydney anymore it does not concern me

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

there is enough signage as it is if only people read them

Do you think this will better inform your decision to use a toll road?

The only way to get more users to be in the tollway is to lower the prices

What other features would you like to see implemented?

LOWER PRICING OF THE TOLLS



---

## Name: Vince

### Do you have any feedback on the Interim Report?

I support the findings of the report, in particular Findings 2, 6, 7, 10 and 11.

Too much of the discussion around privatisation of public assets revolves around the financial implications, ie the amount of up-front money the government can make on the deal. Sadly though, too little consideration is ever given to the loss of control that the government suffers once the contracts are signed. In the case of tollways, we now see that the government is powerless to implement changes that are in tune with the times, such as: time of day tolling; lower tolls for high- occupancy cars; no toll escalation during periods of cost of living stress; discounts for electric vehicles; development of parallel public transport services; changing the light:heavy vehicle toll multiple; changing motorcycle tolls.

In future, contracts should be written such that there is scope for renegotiation of terms at periodic intervals during the concession period, to suit the needs of the time. If the private sector chooses not to participate on these terms, then so be it (similar to the forceful way Norway manages its North Sea oil assets).

### Do you have any other recommendations you would like the Review to explore?

I would like the Review to examine the history of NSW private tollways, and revisit the core promises made at the time that they were developed, during the Greiner government years. The government only gained critical public support for the initiative by making two key commitments:

There will always be a free alternative route; and

The tollway will revert to public ownership at the end of the concession period. Both of these commitments have now been broken:

the M4 was returned to public ownership many years ago, but was subsequently appropriated by WestConnex. It thus became the "free alternative route", but is no longer. So motorists unable/unwilling to pay the new toll have been forced back onto Parramatta Rd or Victoria Rd.

similarly, the M5 East was built out of State funds and was never tolled, yet it was also quietly subsumed by WestConnex and is no longer a "free alternative route".

the M5 west of King Georges Rd was due to revert to public ownership in a couple of years, but was also bundled into the WestConnex sale deal with little or no fanfare. Would the residents of south-west Sydney have supported this action had they been informed?

### What are your views on adopting network pricing for toll roads in Sydney?

I fully support a unified system of toll pricing across Sydney

**What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.**

I support a declining distance charge, however I would like to see it introduced in a way that encouraged more heavy vehicles to use tollways, to relieve the stress on local and arterial roads.

### Setting network tolls with periodic adjustments?

Drop quarterly adjustments, with their minimum price rises. Guaranteeing a minimum rise per quarter may lead to a higher annual rise than the CPI, eg if the quarterly rises in the CPI are 0%, 0%, 2% and 2% (=4% pa), the current quarterly toll adjustments would

be 1%, 1%, 2% and 2% (=6%). How is that fair?

Just make it an annual adjustment figure, just like so many other costs.

**What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?**

Absolutely support iPART involvement.

**Having an independent, external dispute resolution function for the toll road industry?**

Fully support. Perhaps we could arrange for toll reductions when a suitable level of service (eg average travel speed) is not provided to motorists.

We should also specify a higher level of road riding quality, with legally enforceable maintenance standards to be observed.

**What are your thoughts on disclosing the full details regarding the setting of toll price?**

I support full disclosure of all contracts, including all aspects of pricing, once they are signed. This should apply to all public assets, not just tollways.

**What additional details would make you more confident that toll prices are set appropriately?**

The prices should be set such that a person on average wages can afford to use the tollway system (cf the Sunshine Harvester wage case). Without this assurance, we risk exacerbating the 2-class divide already evident, with some folks able to easily afford the tollways and enjoy the benefits they provide, with others forced by necessity to use the congested surface arterial roads.

I would be happy to accept a longer concession period in return for lower tolls.

**Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.**

Yes, the proposed principles do address the key issues. However, I do wonder how they will ever be negotiated when contracts have been signed. What compensations may the government be liable for?

**What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?**

As a general principle, I do not support toll relief. It is a band-aid solution, applied after the fact because the basic tollway deal was not properly structured in the first place. However, given that the contracts are already signed, I see them as a necessary evil, even though they effectively deliver a risk-free, government- guaranteed profit to the tollway operators.

**What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?**

Means testing is desirable, but would be administratively difficult. However, it is preferable to network-wide toll relief which benefits the wealthy as well.

The M5 Cashback now looks like an odd historical anachronism, when other tollways do not enjoy any specific toll relief. But if M5 had not been included in the WestConnex sale, Cashback would not have been necessary for very much longer.

**What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?**

I support better use of modern data sources to provide improved trip planning and journey time information.

I support improved signage and better indications of toll pricing on entry to the tollway. It's not good enough to force people to check the website to see the tolls. The toll information should be reinforced during driving, not simply left until the credit card statement arrives.

Do you think this will better inform your decision to use a toll road?

Yes I do

What other features would you like to see implemented?

- Discounts for electric vehicles
- Lower tolls for large trucks
- no prohibitions on public transport within the same corridor
- annual not quarterly toll adjustments
- removal of the guaranteed minimum toll increase
- rebates when tollway levels of service are not achieved
- commitments that tollways will return to public ownership at the end of the concession period
- ACCC involvement in future tollway approvals / sales, to reduce monopolistic behaviour

---

## Name: Submission 256577

Do you have any feedback on the Interim Report?

Too many Tolls

Do you have any other recommendations you would like the Review to explore?

Toll Companies. They charge a Toll for a service. In most cases they fail to supply those services. If a Toll road is clogged / congested then that Toll should be waived or minimized. Too many times I have entered Toll roads just to sit in Traffic. The M7 Toll should be reduced due to the current road works which is causing congestion.

We, Us Drivers, are paying for a service that these Toll roads are not supplying. Get the Toll Reduced.

Thanks

What are your views on adopting network pricing for toll roads in Sydney?

There should be zero Toll charges

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

At least no charge for no service supplied. IE congested

Setting network tolls with periodic adjustments?

No adjustments.

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

No Tolls

Having an independent, external dispute resolution function for the toll road industry?

No Toll if Congested. And yes this may be good.

What are your thoughts on disclosing the full details regarding the setting of toll price?

Yes, should be up front

What additional details would make you more confident that toll prices are set appropriately?

At least have a Toll free week. See if this makes congestion any better.

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

No they don't.

Too much congestion

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Toll companies should reduce Tolls during congestion

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

No

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

No comment

Do you think this will better inform your decision to use a toll road?

No

What other features would you like to see implemented?

Electronic maps match signage and road markings

---

## Name: Submission 256783

Do you have any feedback on the Interim Report?

The recommendation of peak and off peak does not seem to show equity or fairness to western sydney residents. Due to the long distance they must travel to work, it is "peak" from 7am-10am. Unless there are flexible arrangements at workplaces, Western sydney residents need to leave at the same time, causing a "peak" and thus higher charges.

Do you have any other recommendations you would like the Review to explore?

The governemt shoukd regulate the quality of the roads if we are to pay for them. Transurban should be held accountable to the potholes, dangerous markings and uncared for roads, particularly the hills m2. If we are paying above road taxes each day to use the road, it shoukd be maintained.

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Yes. Toll roads for many is an unavoidable charge due to lack of alternate routes and no public transport options. There are no jobs in the west. There should be accountability for Tolls.

What additional details would make you more confident that toll prices are set appropriately?

Being regulated makes the consumer feel more confident prices are fair and equitable.

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

No. If we are to have tolled roads in nsw they shoukd be heavily regulated.

Many other private businesses are (childcare, medical, electrical, telecommunications).

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

If the Tolls are regulated and capped that would be fairer. It should not be the taxpayers job to subsidise, however fairness should also be looked at for those who are forced to use the roads if no other infrastructure exists such as alternate free routes or efficient public transport.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Means testing only helps the rich who are able to use assets to lower their taxable income and should not be considered

---

## Name: Submission 256843

Do you have any feedback on the Interim Report?

I believe it's unfair for a private enterprise to have a monopoly. Ideally, I'd prefer the government to hold the majority ownership of the toll, perhaps at an 80/20 or at most a 70/30 split. This is because all profits should benefit the community. We can look to examples like Norway, where public-private ownership has been successful.

Please prioritize the well-being of the residents of NSW.

Do you have any other recommendations you would like the Review to explore?

Cheaper Toll, especially M4

What are your views on adopting network pricing for toll roads in Sydney?

Without a unified pricing system, the current structure is quite complex. I would recommend adopting a pricing system similar to that of the train system. This would include peak and off-peak pricing, with shorter distances priced slightly higher.

However, as the distance increases, the price increment should decrease.

Setting network tolls with periodic adjustments?

Yes, agreed as long as it is benefit the community and own by government.

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

The person in IPART should be chosen based on their expertise, rather than being handpicked from among politicians who have been removed from office.

Having an independent, external dispute resolution function for the toll road industry?

Yes

What are your thoughts on disclosing the full details regarding the setting of toll price?

Agreed, everything has to be transparent.

What additional details would make you more confident that toll prices are set appropriately?

N/A

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

Yes

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Do not phase out toll relief. Everyone is working hard to stay afloat, and discontinuing toll relief is the last thing the residents of NSW need.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

N/A

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

N/A

Do you think this will better inform your decision to use a toll road?

not really as google and other maps technology would do better.

What other features would you like to see implemented?

N/A



---

## Name: Submission 256978

What are your views on adopting network pricing for toll roads in Sydney?

It is a total waste of time. Main roads are not a private consumption good, they are a public good by nature. Consult with a qualified economist and ask them if it is sensible to have put public infrastructure into PPPs with a profit motive, zero competition, and guaranteed returns to private capital.

There clearly is nothing that can now be done - to unwind the stupidity of Transport for NSW senior executives past and present, and the profligate stupidity of Labor and liberal/nat politicians who approved taking taxpayers money and torching it. Now it comes down to a game of using taxpayers money to create propaganda campaigns to avoid responsibility for yet another fiasco.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

waste of time. It ultimately penalises people for trying to get to their place of work, with high taxes, pathetic NSW Govt transport infrastructure and services, ludicrous road rules & fining regimes (more taxes, with nil impact on road safety outcomes). I could go on, but there is little point as NSW Govt will engage PR agencies to whitewash all NSW resident feedback, and deliver a propaganda campaign to defer solutions to 'the future'

Setting network tolls with periodic adjustments?

waste of time

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

stupidity. IPART can do whatever they like it will not unwind the systematic wealth transfer NSW Transport and Labor and Liberal politicians have entrenched into long term contracts to the benefit of investment banks and the detriment of NSW citizens.

Having an independent, external dispute resolution function for the toll road industry?

an independent enquiry into dispute resolution is a total waste of time and taxpayers money.

An independent enquiry into which specific individuals from NSW Transport and previous Labor and liberal governments approved this stealing from NSW taxpayers and road users would be significantly more productive - to make sure they are removed from Government agencies and we learn from this whole series of stupid decisions.

What are your thoughts on disclosing the full details regarding the setting of toll price?

Waste of time

What additional details would make you more confident that toll prices are set appropriately?

I think you have by now realised my view is you are throwing good (taxpayers) money after bad by embarking on this propaganda campaign to cover up the stupid decision to gift hundreds of millions of dollars to private capital for monopoly infrastructure goods

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

no. You are either cross subsidising Macquarie Bank with taxpayers money (at 20%+ return on capital) or you are making taxpayers lay more cash out of their already overtaxed residual income.

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

go ahead - it makes no difference, NSW Government and Teansport for NSW are merely delaying the ultimate cost NSW residents will pay for the criminally stupid decision to privatise roads to private capital.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

total stupidity - means testing road tolls? you can't be serious.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Look at this shiny ball over here - you can plan your trip in advance online. I can see the App now:

"welcome to Transport for NSW - we are please to inform you your 2.3km journey today will be complete in 1 hour and 32 minutes, and your means-tested contribution to Macquarie Bank's return on equity targets will be \$43.46"

We don't need foreign powers to destroy this country we have Transport for NSW and

The combined NSW Labor/Liberal party already working to that outcome.

Good work.

Do you think this will better inform your decision to use a toll road?

no. I avoid them at all costs.

What other features would you like to see implemented?

A public independent enquiry into which specific individuals, past or present, in Transport for NSW, are responsible for the designs to privatise each individual section of toll road - by LGA.

---

## Name: Submission 257346

Do you have any feedback on the Interim Report?

No Tolls at all, pay for roads with GST and income tax.

Do you have any other recommendations you would like the Review to explore?

No Tolls at all, pay for roads with GST and income tax.

What are your views on adopting network pricing for toll roads in Sydney?

No Tolls at all, pay for roads with GST and income tax.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

No Tolls at all, pay for roads with GST and income tax.

Setting network tolls with periodic adjustments?

Do not privatise PUBLIC infrastructure. Transurban needs to go. No Tolls at all, pay for roads with GST and income tax.

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Do not privatise PUBLIC infrastructure. Transurban needs to go. No Tolls at all, pay for roads with GST and income tax.

Having an independent, external dispute resolution function for the toll road industry?

Do not privatise PUBLIC infrastructure. Transurban needs to go. No Tolls at all, pay for roads with GST and income tax.

What are your thoughts on disclosing the full details regarding the setting of toll price?

Do not privatise PUBLIC infrastructure. Transurban needs to go. No Tolls at all, pay for roads with GST and income tax.

What additional details would make you more confident that toll prices are set appropriately?

Do not privatise PUBLIC infrastructure. Transurban needs to go. No Tolls at all, pay for roads with GST and income tax.

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

Do not privatise PUBLIC infrastructure. Transurban needs to go. No Tolls at all, pay for roads with GST and income tax.

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Do not privatise PUBLIC infrastructure. Transurban needs to go. No Tolls at all, pay for roads with GST and income tax.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Do not privatise PUBLIC infrastructure. Transurban needs to go. No Tolls at all, pay for roads with GST and income tax.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Do not privatise PUBLIC infrastructure. Transurban needs to go. No Tolls at all, pay for roads with GST and income tax.

Do you think this will better inform your decision to use a toll road?

Do not privatise PUBLIC infrastructure. Transurban needs to go. No Tolls at all, pay for roads with GST and income tax.

What other features would you like to see implemented?

Do not privatise PUBLIC infrastructure. Transurban needs to go. No Tolls at all, pay for roads with GST and income tax.

---

## Name: Submission 257375

Do you have any feedback on the Interim Report?

Do not privatise PUBLIC infrastructure. No tolls at all. Pay for roads with GST and income tax.

Do you have any other recommendations you would like the Review to explore?

Do not privatise PUBLIC infrastructure. No tolls at all. Pay for roads with GST and income tax.

What are your views on adopting network pricing for toll roads in Sydney?

Do not privatise PUBLIC infrastructure. No tolls at all. Pay for roads with GST and income tax.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Do not privatise PUBLIC infrastructure. No tolls at all. Pay for roads with GST and income tax.

Setting network tolls with periodic adjustments?

Do not privatise PUBLIC infrastructure. No tolls at all. Pay for roads with GST and income tax.

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Do not privatise PUBLIC infrastructure. No tolls at all. Pay for roads with GST and income tax.

Having an independent, external dispute resolution function for the toll road industry?

Do not privatise PUBLIC infrastructure. No tolls at all. Pay for roads with GST and income tax.

What are your thoughts on disclosing the full details regarding the setting of toll price?

Do not privatise PUBLIC infrastructure. No tolls at all. Pay for roads with GST and income tax.

What additional details would make you more confident that toll prices are set appropriately?

Do not privatise PUBLIC infrastructure. No tolls at all. Pay for roads with GST and income tax.

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

Do not privatise PUBLIC infrastructure. No tolls at all. Pay for roads with GST and income tax.

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Do not privatise PUBLIC infrastructure. No tolls at all. Pay for roads with GST and income tax.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Do not privatise PUBLIC infrastructure. No tolls at all. Pay for roads with GST and income tax.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Do not privatise PUBLIC infrastructure. No tolls at all. Pay for roads with GST and income tax.

Do you think this will better inform your decision to use a toll road?

Do not privatise PUBLIC infrastructure. No tolls at all. Pay for roads with GST and income tax.

What other features would you like to see implemented?

Do not privatise PUBLIC infrastructure. No tolls at all. Pay for roads with GST and income tax.

---

## Name: Mark

Do you have any other recommendations you would like the Review to explore?

Subject to improvements, can some of the boundaries get adjusted to better reflect usage. Also extended M4,M5 tolls to M7 and Lane Cove Tunnel to Harbour crossings (ramps built as part of that project tolled)

What are your views on adopting network pricing for toll roads in Sydney?

Has both positive and negative. Previous government should have explored this prior to sell off of Westconnex

Setting network tolls with periodic adjustments?

Working towards fixed amount for large vehicles compared to small. Current system varies greatly

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Ultimately if operators get scared, investment will stop

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

It should be built into reform package. Extend contracts in lieu of compensation

---

## Name: Submission 257822

Do you have any feedback on the Interim Report?

With regard to fairness of the Toll charges being applied to all vehicles, the current system has, as per the report clearly failed. However a system that splits vehicles into a number of predefined classes even with additional classes still adds an element of hit and miss. As an example in the proposed class MCHV you could have two vehicles one a Refrigerated truck just inside the criteria, the other a small Motorhome that just fails Class A. The Commercial vehicle being heavier on the road and then has his tolls reduced by tax.

As an alternative to size based classifications, why not use weight. As vehicle registration requires GVM (Gross Vehicle Mass) which is tied to the registration number and could be tied to the tolling tag number. This would be far simpler: no more fancy technology and algorithms to determine class of vehicle. If it's good enough to determine registration costs it should be good enough to determine toll fees.

Do you have any other recommendations you would like the Review to explore?

Directly from above:

As an alternative to size based classifications, why not use weight. As vehicle registration requires GVM (Gross Vehicle Mass) which is tied to the registration number and could be tied to the tolling tag number. This would be far simpler: no more fancy technology and algorithms to determine class of vehicle. If it's good enough to determine registration costs it should be good enough to determine toll fees.

What are your views on adopting network pricing for toll roads in Sydney?

I think this would be a good idea.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

No Comment

Setting network tolls with periodic adjustments?

Unsure

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

YES

Having an independent, external dispute resolution function for the toll road industry?

What are your thoughts on disclosing the full details regarding the setting of toll price?

They should be fully disclosed.

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

The proposed tolling principles do not adequately address the issues, because the proposal still retains toll classes, which is a fundamentally flawed methodology.



---

## Name: Vince

### Do you have any feedback on the Interim Report?

It is the usual smoke and mirrors long winded say nothing rubbish that we have come to expect from TfNSW. Your organisation and the myriad of other names it has had over the past 50 years have been responsible for the deterioration of our road system. You have not built one motorway in the past 50 years that has been fit for the volume of traffic the day it opened let alone having any capacity for future growth. This has necessitated the widening of these roads at a much greater cost than if they were built to the required level in the first place. Looking at your last debacle, the Rozelle interchange, Mickey Mouse with a crayon could have designed a better and more efficient system. With all the machinery there, all the room for expansion all you could come up with and construct was this useless gridlocked disaster. So what do you do to fix it, you change the phasing of the traffic lights in Drummoyne to reduce the number of cars going in. This had just led to rat running through once quiet residential streets. Well done. As for the tolling on our roads, this should be investigated and those responsible held criminally liable. Handing over public infrastructure to an external firm that use them as a milch cow profit making machine with little if any funding going back to the rightful owners, the people of NSW is a disgrace. On the M1, tollgates were installed and a reasonable fee was charged for a number of years until the road was paid for.

Once this was done the toll was removed. THIS IS THE MODEL THAT SHOULD HAVE BEEN USED FOR ALL SUBSEQUENT MOTORWAYS. Even a reasonable toll of say \$2 per trip, with these funds going directly into consolidated revenue, would more than adequately cover the cost of maintenance and could be used to service future loans for future motorway and interchange construction.

### Do you have any other recommendations you would like the Review to explore?

Why can't the original motorway funding model where a loan was raised, the road was built, a reasonably priced toll was imposed and at the tie when the road was paid for, the toll was removed. A subsequent reasonably priced toll such as say \$2 per use would cover the cost of maintenance and future loan repayments for new roads. The current gouging of motorists with some convoluted hard to navigate and use payback scheme that only benefits western Sydney users is a farce. As is the profits that Transurban make is obscene and those that allowed this system to be set up should be charged. Shame on you TfNSW.

### What are your views on adopting network pricing for toll roads in Sydney?

Tolls are too high and the profits from these go to Transurban not the people of NSW This is a disgrace. Please return to a more reasonable pricing structure. No car should be charged more than \$2 per trip on any motorway of toll road in Sydney.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

There is nothing efficient, fair, simple or transparent about tolls on roads in Sydney. They all cost too much and are grossly unfair to road users. The only ones in favour of the present system, which they want, though this proposed new system are Transurban who stand to gain financially while TfNSW continue to blunder and lurch from one infrastructure disaster, such s the Rozelle Interchange to the next.

### Setting network tolls with periodic adjustments?

No adjustment. Just set a fair toll such as \$2 per trip

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

You don't need another overpriced quango to set a toll price.

Having an independent, external dispute resolution function for the toll road industry?

We have one now, just stop and ask anyone using a toll road what they think of it. There is plenty of time to ask motorists stuck going nowhere on gridlocked roads that were not constructed fit for purpose day 1 let alone having any capacity for future growth.

What are your thoughts on disclosing the full details regarding the setting of toll price?

How are you going to do that? Just say Transurban aren't making enough money so they are going to put the toll up each quarter and there is nothing you can do about it. Look at the stupidity, and the effect on traffic that just two stupid short journey tolls have on motorists at the M4 Parramatta Rd and Military Rd off ramp. These have led to massive traffic problems as well as the injury and in a number of cases on the M4 deaths of motorists trying to get off to avoid these stupid greedy tolls

What additional details would make you more confident that toll prices are set appropriately?

I have no confidence in the tolling price system. The sooner Transurban are out and a reasonably priced system where the money benefits the road users of NSW the better.

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

No. They are grossly inflated and the bulk of the money is not used to make better roads in NSW.

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

The whole toll relief system is a joke. It amounts to nothing more than pork barreling the motorists of Western Sydney. Its just another joke in the whole farcical system of toll roads in NSW

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

You don't need to any of this if you get rid of Transurban and put in tolls that are reasonably priced. To go and pick up my grandchildren from Ryde to Maroubra and home costs me \$34. This is disgusting and unnecessary. \$2 each way would be fair

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Online trip planning - good idea, improved signage - it couldn't be any worse. There are a number of roads where the signage is either non-existent, in the wrong location or has deteriorated to the point where it is unreadable, Historical and future toll usage - what's the point of that? Just make all tolls a set fee of say \$2 and that negates the expense and effort of setting up a whole new department and administration to try and justify robbing Sydney motorists with exorbitant tolls Increases and increased visibility of toll-related information - Another waste of time. We know we are getting shafted, we don't need your cheap excuses for why.

Do you think this will better inform your decision to use a toll road?

We don't need this information. The main reason people try and avoid the toll roads is THEY ARE TOO EXPENSIVE!! Look at the disaster of the M4 Parramatta Rd and Military Rd off ramps. Blind Freddy can see this system is flawed and needs to be thrown out.

### What other features would you like to see implemented?

Get some engineers and road designers in that can plan, design and then construct roads and interchanges that are not only fit for purpose the day they open but have some capacity for the future. I am sure Bradfield, who constructed the Harbour Bridge in 1932, with capacity for expansion must be turning in his grave at the way in which roads have been constructed in NSW. M4 - had to be widened after opening. M2 - had to be widened after opening. M7 - had to be widened after opening. M5 - had to be widened after opening. I could go on but you get the picture (you probably don't if the truth be known). Get rid of the Transurban model and get back to the one use to construct the M1, place reasonably priced tolls on the roads until paid off and then implement a flat fee \$2 toll for all roads. You don't need toll relief, indexation of quarterly increases and all the rest of the bullshit you use to cover the fact that you couldn't run a macrobiotic sustainably sourced chook raffle let alone a road network.

---

## Name: Dennis

Do you have any feedback on the Interim Report?

Introducing "two-way tolling on the Sydney Harbour Bridge, the Sydney Harbour Tunnel and the Eastern Distributor" is nothing less than a slap in the face for any tax payer, both of these assets have been paid several times over. Asking the tax payer to pay for those assets yet again is outrageous.

Further, it will put even more traffic on the utterly congested Victoria Road, whose widening projects have mostly been scrapped for reasons impossible to justify.

Do you have any other recommendations you would like the Review to explore?

Instead of reviewing a broken system, fix it from the ground up. Roads should not be paid for by the tax payer, then sold off to private entities just to generate private profits for decades, and even further subsidized by tax funded toll relief programs (nothing less but a direct subsidy of those private profits)

Get public assets back into public hands!

What are your views on adopting network pricing for toll roads in Sydney?

It will change very little about the overall broken system or private corporations making undue profits based on public assets.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

See point 8 - it's all lipstick on a pig.

Setting network tolls with periodic adjustments?

The wet dream of any private company, profits guaranteed to rise in excess of CPI.

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Another toothless organization with highly paid executives and committee members achieving absolutely nothing.

Having an independent, external dispute resolution function for the toll road industry?

N/A

What are your thoughts on disclosing the full details regarding the setting of toll price?

N/A

What additional details would make you more confident that toll prices are set appropriately?

A toll system run by the government and not a private corporation paying dividends (<https://www.transurban.com/investor-centre/distributions-and-tax/trust-distributions>)

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

No, for reasons mentioned previously. Any system that allows private corporates to profiteer from public assets is broken by definition.

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

N/A

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

N/A

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

N/A

Do you think this will better inform your decision to use a toll road?

No

---

## Name: Submission 258083

Do you have any feedback on the Interim Report?

Sydney's road networks are "the legacy of past decisions made within the context of PPP arrangements..." A majority of people believe tolling costs are unreasonable and many drivers avoid using toll roads, because of this. The government finds itself in an unenviable position.

More broadly, privatisation maximising profits and socialising the losses has not benefited most people. Things once the responsibility of government have been sold off to the highest bidder for a one-off short-term financial hit.

Phase 3 a. of the Interim Report recommends " removing some roads from tolls if government had the financial capacity". I suggest they do and it could be done in calculated and planned stages and without taking funds from general taxation, by borrowing money on long-term loans, which would be repaid from reduced tolling (user pays) and buy out existing contracts. Provision of long-term road maintenance could also be achieved by this arrangement.

It seems to me government borrowing money to build roads (which they own), is sounder than allowing gouging by private companies under 30-45 year contracts.

If the government clearly explained their reasoning to voters, that once a road/highway/expressway was built by a private company, paid for by the government, reasonable tolls would be applied to users, until the loan is repaid; people would be accepting of this because they can see the fairness in relation to use and cost.

I agree that "it is necessary to replace the existing contractual provisions relating to the setting of tolls with new provisions".

I also agree State TollCo is sound and any "toll relief should be directed to reducing tolls".

Do you have any other recommendations you would like the Review to explore?

In view of the development in the Ryde region and the associated infrastructure required, can I ask if the County Road gazetted in July, 1951 will be proceeded with, as currently it is a key transport missing-link?

What are your views on adopting network pricing for toll roads in Sydney?

Not in favour

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Only on currently tolled roads

Setting network tolls with periodic adjustments?

Agreed

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

In view of 10, IPART involvement is unnecessary

Having an independent, external dispute resolution function for the toll road industry?

Yes

What are your thoughts on disclosing the full details regarding the setting of toll price?

Essential

What additional details would make you more confident that toll prices are set appropriately?

A body/group representing toll users having input into toll prices.

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

I think all tolling should be controlled by government for road users on roads they own.

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

If the government reduced road tolls by buying out private contracts, perhaps in planned stages, toll relief would not be necessary.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

See previous response.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Certainly positive.

Do you think this will better inform your decision to use a toll road?

Not particularly. I long for the day that all toll roads will exclude private contracts to enable 30-45 of price gouging to road users.

What other features would you like to see implemented?

Greater government transparency in decisions affecting not only road use but transport in all forms.

---

## Name: Submission 259241

Do you have any feedback on the Interim Report?

The report didn't consider the option of having everyone pay a levy in their vehicle registration. A reduction in toll fees will not work for the very short toll roads such as m5 east as the alternatives are way too good. See below why this recommendation is preferred.

Do you have any other recommendations you would like the Review to explore?

The best way to make the toll system fair for everyone is to introduce a levy on each vehicles registration (cars, motorbikes, trucks and even bicycles) to pay the profits to Transurban. \$2B/9M registered vehicles and cancellation of existing government toll rebates would mean roughly \$160 per vehicle. That is a huge saving for the regular users and a small fee for the irregular users. Regional owners should have concessions and trucks should have a surcharge. Very short toll roads such as the m5 east between King Georges Rd and March St will not be used even if the tolls are reduced given the free alternative. The alternative is far too good regardless of cost. By having everyone pay in advance, everyone will want to use the motorways rather than avoid it. For \$160 for each vehicle, that is a full years worth of motorways anywhere in Sydney. Whereas at the moment, \$160 can easily be spent by an irregular user by only making 15 trips a year.

What are your views on adopting network pricing for toll roads in Sydney?

Pricing is high regardless of how you look at it, especially if there are good free alternatives such as Stoney Creek Rd and Forest Rd instead of the m5 east. It does not work for these roads unless the price is near zero.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Pricing needs to be near zero for toll roads that are short distance and have good convenient free alternatives such as Stoney Creek Rd and Forest Rd is traditionally of the m5 east.

Setting network tolls with periodic adjustments?

No, it's too confusing. Keep it simple.

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Yes, the government should not allow the toll operators to control pricing the way they have. They are the people's roads and should not be for profit.

Having an independent, external dispute resolution function for the toll road industry?

Not sure

What are your thoughts on disclosing the full details regarding the setting of toll price?

Of course.. all details should be available for everyone.

What additional details would make you more confident that toll prices are set appropriately?

Contact details for the ones that have set it and approved it.



Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

No...tolls are the issue. Anyone that uses them doesn't want to pay it. It is as simple as that. Make everyone pay it in advance, that way there are no more complaints.

Everyone suffers the same amount rather than everyone suffering by either high toll prices, rat running, increased congestion etc.

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

If you make everyone pay a levy on their registration, you can abolish the toll rebate.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Toll relief is good only if it means it is near zero.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Waste of money

Do you think this will better inform your decision to use a toll road?

No. It needs to be free otherwise I will use the free alternative.

What other features would you like to see implemented?

Pay a levy in the registration rather than toll road

---

## Name: Andrea

### Do you have any feedback on the Interim Report?

I agree with the report's survey showing that people thinks tolls are excessive. They are unfair and limit those on lower incomes. They divert traffic onto toll-free roads like south dowling street, stoney creek road and bexley road which are not designed to be major transit corridors. Seniors, concession card holders and low income residents can hardly drive anywhere in Sydney without using a toll which put them at great disadvantage.

### Do you have any other recommendations you would like the Review to explore?

Tolls should be capped at \$5 max per trip. Rebates and systems which rely on users filling in long forms to get toll money back if they are eligible just mean that people miss out and pay full whack because the don't have time to do that paperwork.

Anything that would distribute the load better across the roads, motorways are designed for cars and trucks, residential roads that people take to avoid tolls are NOT.

### What are your views on adopting network pricing for toll roads in Sydney?

Yes, anything that reduces the Transurban monopoly and reduces overall toll prices gets my support.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Yes that sounds sensible.

### Setting network tolls with periodic adjustments?

Yes, peak vs off peak tolls are good. But still not as high as current.

### What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

If it would give a more objective view of the toll levels across Sydney.

### Having an independent, external dispute resolution function for the toll road industry?

Yes if it would give a more objective view of the toll levels and keep tolls lower.

### What are your thoughts on disclosing the full details regarding the setting of toll price?

Yes, transparency is preferred

### What additional details would make you more confident that toll prices are set appropriately?

Data. Eastern Distributor is SO high but if it was higher when there were lots of cars using it (like surge pricing) or peak hour tolls being higher, I would understand.

People south of the bridge DO need to drive north and shouldn't be smashed with a huge \$10 toll when people driving south across the bridge pay \$4 or less. So unfair!

### Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

Any changes that will reduce tolls and take the power off transurban is a step forward.

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

I don't like the toll relief system - too much paperwork - people do NOT have time. Get the toll pricing right and keep it lower or use e-tag data to toll based on concession eligibility not rebate money after the fact via long-winded forms and online processes.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Love it. Keep them low. Make it fairer. This issue needs urgent attention.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Yes, better transparency and advice on the road is great.

Do you think this will better inform your decision to use a toll road?

Yes, indeed

What other features would you like to see implemented?

Users should never have to fill in forms to get money back. Just make the toll fee correct in the first place.

---

## Name: Submission 259284

Do you have any feedback on the Interim Report?

It is good to see it being reviewed however there seems to be scarce reference to the impact tolls are taking on non-tolled areas. For example when the previously free (non-tolled) section of the M5 became tolled, immediately local roads in the Arncliffe and Bexley area saw a significant increase in road users, many large trucks and other commercial vehicles. Toll caps has not worked and these roads - some on the same roads as schools, are busy 24/7. As children walk to school on these roads, there is a real danger that pedestrian accidents involving children will increase. Residents in these areas (like my own family) are dealing with noise pollution and our homes being covered in black emissions. This was NEVER the case.

Do you have any other recommendations you would like the Review to explore?

Speak with residents affected by toll road changes. Monitor traffic changes. Importantly tolled roads is only one solution to moving people around. Improve public transport infrastructure and price point use to get people out of their cars.

What are your views on adopting network pricing for toll roads in Sydney?

Not sure. Why don't you link toll apps to public transport apps to monitor use of both. You should then get a picture of Sydney movements by car and therefore where public transport needs to be improved

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Not sure

Setting network tolls with periodic adjustments?

Agree

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Not Sure

Having an independent, external dispute resolution function for the toll road industry?

Very much support this idea. I also want to see more transparency in decision making about building more road infrastructure

What are your thoughts on disclosing the full details regarding the setting of toll price?

Agree

What additional details would make you more confident that toll prices are set appropriately?

Must be external. Must take into consideration impact on local roads with a monitoring and review period after any significant increase to a toll

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

No as mentioned before, impact on local communities as road users try and dodge toll roads has not been properly investigated

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Remove them except for some means testing. Also, but ban heavy trucks on local roads. Road use is a choice. Countries like Japan do not have toll relief and it means more people decide to use public transport

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

To some degree. Reviewing tolls without discussion on public transport infrastructure seems odd. The movement of people, goods and services should be looked at as a whole

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Nothing to add

Do you think this will better inform your decision to use a toll road?

No

What other features would you like to see implemented?

Already mentioned

---

## Name: Submission 259332

Do you have any feedback on the Interim Report?

N/A

Do you have any other recommendations you would like the Review to explore?

N/A

What are your views on adopting network pricing for toll roads in Sydney?

I am not aware about that. But the prices for tolls are above the roof

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

N/A

Setting network tolls with periodic adjustments?

N/A

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

N/A

Having an independent, external dispute resolution function for the toll road industry?

N/A

What are your thoughts on disclosing the full details regarding the setting of toll price?

Would be good

What additional details would make you more confident that toll prices are set appropriately?

N/A

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

N/A

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

N/A

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

N/A

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

N/A

Do you think this will better inform your decision to use a toll road?

N/A

What other features would you like to see implemented?

Noise cameras in Rockdale Bay street/ George street intersection. It's often car crashes there as well. So I believe the noise cameras would make drivers to be more cautious.

Also would help the residents to sleep at night rather than calling police. Especially in that area there are rocks and a building on one side and another building on another, the noise is just doubling there and above 80db for sure

---

## Name: Submission 259333

### Do you have any feedback on the Interim Report?

Toll prices set too high, leading to crowding on the untolled surrounding areas.

I live in Bexley. Due to the M5 toll road nearby, we have a huge problem of drivers avoiding the toll roads and driving down Forest Rd, Stoney Creek Rd and Bexley Rd (where I live). The volume of traffic is extreme and includes many trucks, with Forest Rd being designated an official truck detour.

It is hard to drive through so much traffic with enormous queues at intersections. It is dangerous for pedestrians or cyclists - large volumes of impatient drivers on congested roads mean people are constantly driving dangerously including running red lights, especially at the Forest Rd/Harrow Rd intersection. My toddler and I have nearly been hit multiple times while crossing the roads on green pedestrian crossings by drivers driving like idiots. It is very noisy (especially from truck engine brakes as well as motorbikes and general hooning) and can easily be heard while walking around the area and also while inside our double-glazed home. There is also a lot of pollution from diesel fumes with a high volume of trucks idling in traffic jams. Our residential roads were not designed for this level of traffic, especially trucks, and are full of potholes.

Bexley is a residential suburb and the negative impact the detoured traffic has had is enormous. We have very few shops and the ones we have go out of business quickly. No one wants to sit outside a cafe and be choking on diesel fumes, or not be able to have a conversation over the noise. There is very little parking and these drivers are not stopping in the suburb, they don't live or work here and are not stopping to shop. There are very few pedestrians around and no community feel.

The traffic is dangerous for pedestrians. Bexley residents do not want this traffic here. Putting tolls on nearby motorways led to entirely foreseeable consequences for Bexley and resident complaints on the issue have been ignored for too long.

### Do you have any other recommendations you would like the Review to explore?

3 main solutions:

forcing trucks to get off residential streets and use the toll roads by installing a gantry

bringing toll road prices down so other vehicles actually use it the toll road

noise cameras to catch hooning and motorbikes, and more red light cameras to improve pedestrian safety

### What are your views on adopting network pricing for toll roads in Sydney?

I support anything that gets trucks and other vehicles off the residential roads

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

I support anything that gets trucks and other vehicles off the residential roads

### Setting network tolls with periodic adjustments?

I support anything that gets trucks and other vehicles off the residential roads



What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

I support anything that gets trucks and other vehicles off the residential roads

Having an independent, external dispute resolution function for the toll road industry?

I support anything that gets trucks and other vehicles off the residential roads

What are your thoughts on disclosing the full details regarding the setting of toll price?

I think transparency is always helpful

What additional details would make you more confident that toll prices are set appropriately?

By seeing the subsequent impact on traffic volumes on residential streets. We can tell if the toll roads are being used which they won't be if prices are too high.

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Happy - it targets investment into toll roads and we would need less for residential roads. Right now the government is paying a lot to keep fixing the potholes on our roads anyway and this cost would come down.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Yes aside from not going far enough to address the problem of high volumes of trucks transiting through residential roads.

What are your views on the proposed improvements to motorists experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Fine

Do you think this will better inform your decision to use a toll road?

Price will always be the most significant factor

What other features would you like to see implemented?

Red light cameras (you'd make an absolute fortune) Truck gantry system

---

## Name: Submission 259334

What are your views on adopting network pricing for toll roads in Sydney?

Why can the rebate not continue for people who use the toll roads but do not spend over \$60? I pay approx \$58 a week so i get nothing anymore...not fair at all

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Bring back the rebate for under \$60 a week regular drivers

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

The toll relief should be extended for people who pay just under \$60 a week on tolls...

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Toll relief should continue for regular users even just under \$60 a week...

---

**Name: Bruce**

Do you have any feedback on the Interim Report?

Since the reintroduction of tolls on the M5 traffic in our area and particularly along Lorraine Ave Bardwell Valley has increased considerably. Cars are using this road as a shortcut to avoid Forest Rd which is jammed with trucks and traffic.

Do you have any other recommendations you would like the Review to explore?

There should be a closure to Lorraine Ave on Bexley Rd and at the same time decrease tolls for trucks to keep them on M5.

Setting network tolls with periodic adjustments?

Not time but type of vehicle. Keep trucks off suburban streets

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

Stop increasing tolls or better remove them from M5

Having an independent, external dispute resolution function for the toll road industry?

The previous government created a toll road nightmare. How you solve it is up to the incumbent government and should not be shovelled off onto some review which does nothing

What are your thoughts on disclosing the full details regarding the setting of toll price?

Do it

What additional details would make you more confident that toll prices are set appropriately?

Disclose the profit margin the toll company is making

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

No because they keep getting more expensive

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Toll relief should be means tested

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

Any saving should be put into public transport

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

Toll costs should be widely notified via google maps and on road signage

Do you think this will better inform your decision to use a toll road?

Using a toll road depends on whether I can avoid it or not. Knowing the price is a further reason to avoid it

What other features would you like to see implemented?

Remove the toll in M5

---

## Name: Margaret

Do you have any feedback on the Interim Report?

The amount of large truck traffic through Bexley is an utter disgrace. Despite all the politicians promises and several reports NOTHING has been done to elivate the problem of truck avoiding the M5 tolls by this rat running along Stoney Creek Road to Port Botany.

Do you have any other recommendations you would like the Review to explore?

Trucks should be blocked from using Stoney Creek Road and diverted onto The Princess Highway instead. At least that way they will be on a highway and not trundling through our narrow shopping centre bringing danger, noise and pollution daily to its residents and businesses.

What are your views on adopting network pricing for toll roads in Sydney?

Speak to the trucking businesses and ask THEM what would persuade them to use the toll.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

Whatever works at getting the trucks off our suburban roads

Having an independent, external dispute resolution function for the toll road industry?

Just get on with it for God's sake. Promised results from train interchange of containers loaded on trains rather than trucks to Port Botany has seen no reduction of traffic!!

What are your thoughts on disclosing the full details regarding the setting of toll price?

Reports, thoughts, surveys etc, etc. etc. just costing tax payers money. Mandate all trucks over 3 tons. use toll roads or major highway to and from Port Botany...simple

What additional details would make you more confident that toll prices are set appropriately?

See above mandate

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

Have you asked the trucking companies this??

Do you think this will better inform your decision to use a toll road?

Doubt it

What other features would you like to see implemented?

Get the trucks off the road them onto the toll roads or off load their containers etc. onto trains.

---

## Name: Submission 259420

Do you have any other recommendations you would like the Review to explore?

Stoney Creek Road Bexley has excessive trucks causing considerable traffic congestion and safety issues. As a rate payer it should not be my job to fix government incompetence. These trucks not only cause congestion but taking up two lanes is an issue where they block the road on turning onto Forest road. They have been seen going through red lights and over the kerb when turning. There have been quite a few near misses with pedestrians crossing or even just waiting to cross. What is the government waiting for before doing something? A fatality? That seems like typical government of Australia no longer for the people

What are your views on adopting network pricing for toll roads in Sydney?

It won't work. Add a few dollars to each car registration each year. Why should certain areas cop tolls when it affects all of the state

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

No it won't work Won't stop congestion

Add a few dollars on all car registration each year to cover every one. The people should not have to pay just because the government got it wrong with infrastructure

Setting network tolls with periodic adjustments?

Charge every car registration on roads to cover tolls Why is burden bring carried by certain suburbs

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

No

Having an independent, external dispute resolution function for the toll road industry?

Is it ever independent?

What additional details would make you more confident that toll prices are set appropriately?

Having tolls evenly distributed across the state

Why do certain suburbs pay more in tolls

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

Definitely not

It will never be fair and equal unless you distribute tolls across the state

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Why can't tolls be added on car registrations across the state

This way the burden is small for everyone and certain areas are not carrying the burden because government couldn't get infrastructure right

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

We will go around in circles unless those in power look at a fairer system

Do you think this will better inform your decision to use a toll road?

I will always avoid paying tolls if I can

I feel targeted because I live in a certain area

What other features would you like to see implemented?

Tolls distributed evenly across all drivers so it's not all targeted in certain areas

---

## Name: Submission 259536

### Do you have any feedback on the Interim Report?

The structure & level of tolls: All findings reflect my own experience and beliefs. When I was in my youth I recall tolls being explained as temporary measures that would cease once the cost of construction was paid. Now it is clearly a private venture supported by members of the Government. We are experiencing a crisis of lifestyle where it is a disincentive to leave the house if it includes tolls vs wear & tear of one's vehicle when taking the lengthy, traffic-laden routes.

All findings are relevant, meaningful & consistent with reality. Finding 14 is especially true. Reform will ultimately help reverse what was allowed to become harmful to the people it is supposed to serve. As someone who lives & utilises Stoney Creek Rd, King Georges Rd & Forest Rd & the roads between it is vastly evident trucks make detours along these streets to avoid tolls. I often opt to walk late at night to avoid the smog that billows out from all the trucks.

### Do you have any other recommendations you would like the Review to explore?

Tolls should have a clear and unchanging end of life.

Perhaps trucks should have significantly reduced tolls (if the toll is even still necessary to regain costs), to encourage them off suburban roads, reducing wear on trucks & potential accidents.

### What are your views on adopting network pricing for toll roads in Sydney?

Network pricing makes sense for networks as we are all interconnected & use of particular areas of a network can complicate the issue.

What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.

I would prefer just a declining distance rate structure as it seems fairer & more efficient/simple. Having infrastructure charges runs the same risk of incentivising toll users to circumnavigate the access points incurring the additional charge leading to congestion/ bottle necks of traffic elsewhere.

### Setting network tolls with periodic adjustments?

There is opportunity for corruption here, also will IPART be able to set periodic adjustments schedules.

What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

This would seem fairer but again as long as they are truly independent.

### Having an independent, external dispute resolution function for the toll road industry?

Page 146 states "TollCo will be a separate and dedicated entity with an independent governing board accountable to the responsible Minister." My question is how will it be ensured that the Minister is accountable to the Independent governing board & that the people on that board will be serving in the interest of toll-users.

An independent EDR would also be good but the above questions still apply.



What are your thoughts on disclosing the full details regarding the setting of toll price?

Great

Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.

#3 should be declining distance rates.

#8 Careful consideration needs to occur with this. High prices already lead to congestion via alternate routes. #9 might help with this. How can we ensure trucks utilise toll roads more?

What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?

Phase out is fine if a significant overhaul & reduction of prices occurs. But a hybrid approach may be a good option. Funding to transition Australia away from traditional asphalt which is susceptible to frequent damage, towards a more durable, sustainable option would be a good use of money. The longer costs would get trucks on toll roads and the damage to roads can be taken care of through our other car levies and taxes - as it should.

What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?

It might be time a massive overhaul occurs to legally restrict cargo operators from using specific roads - rather to set up a truck road network where there are truck lanes.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

I think visibility of toll-related is not so much an issue. People know it costs money - it's too much money so they don't want even larger signs to remind them. Perhaps redirect funds to the other improvements.

Do you think this will better inform your decision to use a toll road?

Yes definitely.

---

## Name: Greg

### Do you have any feedback on the Interim Report?

#### Positive Feedback:

**Recognition of High Costs:** Many drivers would appreciate that the report acknowledges the high and sometimes disproportionate cost of tolls, especially in areas like Western Sydney. This recognition might resonate with those who feel the financial strain of daily toll payments.

**Proposed Fare Reductions:** The introduction of declining distance-based tolls could be viewed favorably by drivers who regularly undertake long commutes, as it suggests that the more they travel, the less they would pay per kilometre. This could potentially lower the cost of longer trips.

**Improvements in Fairness and Transparency:** Drivers would likely support the push for greater transparency in how tolls are set and managed. Knowing more about where their money is going and seeing a fairer toll system could improve trust in the toll management process.

**Enhanced Toll Relief:** The recommendation to reform toll relief schemes to be more targeted and effective could be seen as a positive change, especially for those struggling with the costs, providing more direct financial relief to those who need it most.

#### Concerns or Critiques:

**Implementation Timeline and Impact:** Drivers might be concerned about how long it will take to implement these changes and whether there will be a direct and timely impact on their daily expenses. The transition to a new system could be complex and lengthy, potentially delaying the benefits.

**Complexity of New Pricing Models:** While the move to network tolling and the use of declining distance-based pricing are intended to simplify the toll system, some drivers might find the new models complex and hard to understand, especially if not well communicated.

**Potential Increase in Tolls for Some Routes:** While the overall intention is to decrease toll burdens, some drivers could end up paying more depending on their specific routes and the new network tolling structure. This might lead to dissatisfaction among those adversely affected.

**Skepticism About Real Change:** Given past experiences and the dominance of major players like Transurban, some drivers might be skeptical about the actual

implementation of these changes and whether the proposed reforms will truly materialize in a way that benefits them.

#### General Sentiment:

Overall, drivers are likely to view the report as a step in the right direction, addressing key issues like cost, fairness, and transparency. However, apprehensions about the practical execution and immediate impact of these reforms could temper their enthusiasm. Effective communication and swift implementation of the initial changes could help in building confidence among motorists that these reforms will indeed lead to a fairer and less burdensome toll system.

### Do you have any other recommendations you would like the Review to explore?

#### Real-Time Pricing Information

Implement technology solutions that provide real-time information on toll costs directly to drivers through GPS navigation systems or mobile apps. This transparency could help drivers make more informed choices about their routes, potentially saving money and reducing congestion on less travelled paths.

#### Greater Incentives for Off-Peak Travel

Enhance incentives for driving during off-peak hours. While peak/off-peak pricing is mentioned, offering more significant discounts or rewards for off-peak travel could help distribute traffic more evenly throughout the day, reducing congestion and incentivizing shifts in travel times.

#### Expanded Multi-Vehicle Discounts

Introduce or expand discounts for households with multiple vehicles registered to the same address. This could alleviate the financial burden for families with several commuters, making tolls feel more manageable.

#### Environmental Incentives

Provide reduced toll rates or exemptions for electric vehicles (EVs) and hybrids to encourage eco-friendly transportation choices. This could also align with broader environmental goals and support the transition to a greener vehicle fleet in Sydney.

#### Improved Public Transport Integration

Explore options for better integration with public transport, such as offering toll credits or discounts for drivers who also use public transport regularly. This could help promote a multimodal transport system where more people combine driving with public transport usage.

#### Caps on Total Annual Toll Expenditure

Consider implementing caps on the total annual toll expenditure for individual drivers. Such caps would provide significant relief to regular commuters who spend a substantial portion of their income on tolls.

#### Community Feedback Mechanisms

Establish regular community feedback mechanisms to gather input from drivers on toll policies and their impact. This could be done through online platforms, public forums, or regular surveys, ensuring that toll management remains responsive to the needs and concerns of the community.

#### Enhanced Dispute Resolution Processes

Strengthen dispute resolution processes to make them more accessible and efficient, ensuring that toll disputes are handled fairly and swiftly to maintain trust in the toll management system.

By considering these additional recommendations, the Review could further tailor the toll system to address specific needs and concerns of Sydney drivers, fostering a more equitable, efficient, and user-friendly toll environment.

### What are your views on adopting network pricing for toll roads in Sydney?

#### Benefits of Network Pricing

**Fairness and Equity:** Network pricing can lead to a fairer distribution of toll costs among users. By standardizing toll rates across the network or basing them on distance travelled, it ensures that tolls are more closely aligned with usage. This could mitigate the issue of disproportionately high tolls affecting certain groups, such as residents in Western Sydney who currently bear a heavier toll burden due to their geographic location and reliance on tolled routes.

**Simplicity and Transparency:** A unified network toll system would simplify the toll structure, making it easier for drivers to understand how much they will be charged. This could improve transparency since drivers would no longer need to navigate a complex array of toll rates and rules across different toll roads.

**Efficient Traffic Management:** Network pricing could be used strategically to manage traffic flows across the entire network. For example, variable pricing could be implemented to discourage driving during peak times or on congested routes. This could lead to better overall traffic distribution and reduced congestion.

**Economic Efficiency:** With network pricing, tolls could be set to reflect the true cost of traveling on the network, including factors like maintenance and environmental impacts. This could lead to more

economically efficient use of roadways, where prices more accurately reflect the costs and benefits of road use.

### Challenges and Considerations

**Implementation Complexity:** Transitioning to a network pricing model involves significant challenges, including renegotiating existing contracts with private operators, upgrading tolling infrastructure, and aligning political and public interests. There could be substantial initial costs and complexities involved in implementing such a system.

**Public Acceptance:** Gaining public acceptance for network pricing could be challenging, especially if it results in higher costs for some users who are accustomed to the current pricing structures. Clear communication and demonstrable benefits will be essential to garner support.

**Impact on Low-Income Drivers:** Care must be taken to ensure that network pricing does not disproportionately impact low-income drivers who may rely on toll roads for commuting. Measures like toll caps, discounts, or subsidies could be necessary to maintain affordability.

**Data Privacy and Security:** Implementing more sophisticated network pricing could require more detailed tracking of vehicle movements, raising concerns about data privacy and security. Ensuring robust protections and transparent data handling policies will be crucial.

Overall, adopting network pricing for toll roads in Sydney offers a promising approach to reforming the current toll system to make it more equitable, understandable, and efficient. However, the success of such a transition will heavily depend on thoughtful implementation, widespread stakeholder engagement, and careful consideration of economic, social, and privacy implications.

**What do you think of the preferred pricing option of a declining distance and infrastructure charge? You may wish to reference your response with respect to efficiency, fairness, simplicity and transparency.**

### Efficiency

**Pros:** A declining distance-based charge encourages more efficient use of the road network by reducing the marginal cost of travel as distance increases. This can incentivize longer trips, potentially smoothing out traffic loads across the network and reducing congestion in heavily trafficked areas. The fixed infrastructure charge ensures that those who benefit from expensive infrastructure contribute to its costs, aligning usage with cost recovery.

**Cons:** There might be efficiency losses if the pricing does not accurately reflect the variable costs of different segments of the network or if it leads to unintended travel patterns, such as increased long-distance commuting that could raise overall traffic volumes.

### Fairness

**Pros:** The declining distance charge is designed to be fairer to those who travel longer distances, which often includes commuters from outer suburbs who have fewer transport options. This can help address geographic and socio-economic disparities in toll burdens.

**Cons:** The fairness of the fixed infrastructure charge depends on how it's implemented. If it disproportionately affects users who have no alternative but to use certain expensive infrastructures, it could be viewed as less equitable.

### Simplicity

**Pros:** Simplifying the rate structure with a clear declining scale based on distance can make it easier for users to understand how tolls are calculated, improving the user experience.

**Cons:** While the model aims for simplicity, the combination of two types of charges (distance-based and infrastructure) might still confuse some users, especially if they are not clear about why certain infrastructure charges apply.

### Transparency

**Pros:** This model can enhance transparency by making it clear that part of the toll goes directly towards paying for the infrastructure used, and by showing how the toll decreases with distance, which could help justify the tolling system to the public.

**Cons:** Full transparency would require clear communication about how infrastructure costs are calculated and allocated, which can be complex. The rationale for setting specific declining rates and infrastructure fees needs to be openly shared and justified to maintain public trust.

#### Overall Assessment

The declining distance and infrastructure charge model is a thoughtful approach that seeks to balance efficiency and fairness while attempting to simplify how tolls are understood by the public. However, the success of this model hinges on careful implementation and clear communication. It's crucial that the tolling authorities provide detailed, understandable information about how tolls are calculated and how revenue is used. This transparency is essential not only for gaining public acceptance but also for ensuring that the toll system is seen as fair and justifiable.

In conclusion, this model presents a forward-thinking strategy for reforming toll pricing in Sydney, aligning with broader goals of transportation equity, efficiency, and sustainability. However, ongoing evaluation and adjustment based on actual usage and economic impact will be vital to refining the model to best serve the needs of all stakeholders.

#### Setting network tolls with periodic adjustments?

##### Benefits

**Consistency Across the Network:** Centralizing toll setting under State TollCo can lead to a more consistent and uniform tolling policy across the entire network. This uniformity can simplify the tolling system for users, who no longer have to navigate differing toll regimes on different roads.

**Adaptability:** Periodic adjustments allow for flexibility in the tolling system to respond to changing economic conditions, traffic patterns, and infrastructure needs. This adaptability can help maintain the efficiency and effectiveness of the road network, optimizing traffic flow and reducing congestion.

**Data-Driven Decisions:** With a centralized body like State TollCo, toll adjustments can be based on comprehensive data analysis covering the entire network. This approach can enhance decision-making, ensuring that toll rates are set based on actual usage patterns, economic factors, and the overall public interest.

**Strategic Traffic Management:** By adjusting tolls periodically, State TollCo can use pricing strategies to manage demand on the roads. For example, increasing tolls during peak times to discourage congestion, or reducing tolls for less traveled routes to balance traffic distribution.

##### Challenges

**Public Perception and Acceptance:** Regular changes to toll rates may face public resistance, especially if increases are frequent or perceived as unjustified. Ensuring transparency and effective communication about the reasons for adjustments will be crucial in gaining and maintaining public support.

**Complexity in Implementation:** Managing periodic adjustments requires sophisticated monitoring and analysis systems to accurately assess road usage and economic conditions. The complexity of implementing these systems and ensuring they operate efficiently could pose significant challenges.

**Political and Economic Pressures:** State TollCo could face pressures from political entities and economic stakeholders with differing interests, potentially influencing toll setting in ways that do not align with broader public benefits. Maintaining independence and focusing on data-driven policies will be essential to navigate these pressures.

**Equity Concerns:** There's a risk that periodic adjustments might disproportionately affect certain demographics, particularly low-income drivers who may rely heavily on tolled roads for daily commutes. Balancing economic efficiency with equity considerations will be a critical task for State TollCo.

## Overall Perspective

Assigning the responsibility of setting and adjusting network tolls to State TollCo could provide a structured and centralized approach to managing tolls, which could enhance overall system efficiency and fairness. However, the effectiveness of this approach will heavily depend on the entity's ability to operate independently, transparently, and in alignment with the public interest, while also being responsive to dynamic traffic patterns and economic changes. It's a promising model that requires careful implementation and ongoing oversight to realize its full potential.

## What are your thoughts on IPART involvement in setting toll prices - would you see this as a fairer approach?

### Advantages of IPART Involvement

**Independent Oversight:** IPART is an independent body that has a track record of regulating prices in various sectors, including utilities and transport. Its involvement in setting toll prices can help ensure that toll rates are determined based on objective, fair, and transparent criteria, rather than being influenced by commercial or political interests.

**Expertise and Experience:** IPART brings a wealth of experience in economic regulation, including the assessment of fair pricing structures that balance the needs of infrastructure funding with consumer protection. This expertise can be invaluable in assessing complex factors involved in toll pricing, such as cost recovery, return on investment, and economic impact on users.

**Public Confidence:** Having an independent regulatory body like IPART set or oversee toll prices could enhance public trust in the tolling system. Knowing that toll rates are reviewed and approved by an independent authority might alleviate public concerns about being overcharged.

**Consistency and Predictability:** IPART's involvement can also bring consistency and predictability to the toll-setting process, which can be beneficial for both users and investors. Clear guidelines and methodologies used by IPART for price setting can provide a stable environment for infrastructure investment and development.

### Potential Challenges

**Balancing Stakeholder Interests:** One of the challenges for IPART would be balancing the diverse interests of different stakeholders, including toll road operators,

commuters, and the government. There is often a delicate balance between ensuring adequate returns on investments for infrastructure developers and keeping tolls affordable for users.

**Complexity of Toll Road Economics:** Toll roads involve complex economic considerations, including long-term capital expenditure, fluctuating traffic volumes, and economic externalities such as congestion and environmental impacts. IPART would need to effectively navigate these complexities to set appropriate tolls.

**Frequency and Timing of Reviews:** Determining the appropriate frequency and timing of toll price reviews can be challenging. While regular reviews can ensure tolls remain fair and aligned with current conditions, they can also introduce uncertainty for both operators and users if not well-managed.

**Potential for Regulatory Lag:** In rapidly changing economic or traffic conditions, there might be a lag in regulatory response, especially if toll price adjustments require extensive review and approval processes. This could prevent timely adjustments to toll rates that might be necessary to respond to unexpected changes in road usage or economic conditions.

### Conclusion

Overall, involving IPART in setting toll prices is likely to be seen as a fairer approach, enhancing the legitimacy and acceptability of toll charges through independent and expert oversight. However, for IPART's involvement to be effective, it must be backed by a strong mandate, clear regulatory frameworks, and sufficient resources to handle the complexities of toll pricing. By ensuring that toll rates are set in a transparent, consistent, and economically sound manner, IPART can help achieve a balance between the financial sustainability of toll road projects and the affordability concerns of road users.

## Having an independent, external dispute resolution function for the toll road industry?

### Benefits of an Independent EDR Function

**Enhanced Consumer Trust:** An independent EDR function would provide a clear, impartial avenue for resolving disputes between toll road users and operators. This would likely increase consumer confidence in the fairness of the toll system, as users would have a reliable mechanism to voice concerns and seek redress without fearing bias.

**Improved Accountability:** An independent EDR body could hold toll operators accountable for their practices, ensuring they adhere to regulatory requirements and

fair practices. This oversight could help prevent issues such as overcharging, billing errors, and transparency in toll transactions.

**Efficiency in Dispute Resolution:** Dedicated EDR services are typically designed to resolve disputes quickly and effectively, minimizing the need for lengthy and costly legal proceedings. This not only benefits consumers by providing timely resolutions but also helps operators by reducing the administrative burden of handling disputes internally.

**Data Collection and Trends Analysis:** An independent EDR function can act as a central repository for data on the types and frequencies of disputes, which can be invaluable for regulatory bodies and operators in identifying systemic issues or trends. This data can drive improvements in toll management and infrastructure planning.

**Consumer Education and Information:** Besides dispute resolution, EDR functions often play a role in consumer education, providing information about consumers' rights and responsibilities. This could help reduce the occurrence of disputes by ensuring that toll road users are better informed about tolling practices.

### Potential Challenges

**Resource Intensive:** Establishing and maintaining an independent EDR function can be resource-intensive. It requires funding, skilled personnel, and robust systems to handle inquiries and adjudicate disputes effectively.

**Scope of Authority:** The effectiveness of the EDR function depends significantly on the scope of its authority. If it lacks the power to enforce decisions or mandate corrective actions, its ability to effectively resolve disputes may be limited.

**Integration with Existing Systems:** Integrating a new EDR function with existing toll management and customer service systems can be complex. Ensuring seamless data flow and communication between systems is crucial for the EDR function to operate effectively.

**Public Awareness:** The benefits of an independent EDR function can only be realized if toll road users are aware of its existence and how to access it. Significant efforts in outreach and education will be necessary to ensure users know where and how to file disputes.

### Conclusion

Overall, the introduction of an independent, external dispute resolution function for the toll road industry could bring substantial benefits in terms of fairness, transparency, and efficiency. However, its success would depend on careful planning, adequate resourcing, and clear delineation of its powers and responsibilities. With these

elements in place, such a function could play a crucial role in enhancing the toll road experience for users and improving the operational standards of toll road operators.

## What are your thoughts on disclosing the full details regarding the setting of toll price?

### Benefits of Full Disclosure

**Increased Transparency:** Full disclosure ensures that all stakeholders, including drivers, policymakers, and the general public, understand how toll prices are determined. This openness can help demystify toll calculations, which are often perceived as opaque or arbitrary.

**Enhanced Trust and Credibility:** When toll road operators openly share their pricing strategies, including the factors influencing toll rates such as costs, investments, and profit margins, it builds trust. Stakeholders are more likely to support or accept tolls if they see them as fairly and transparently calculated.

**Accountability and Oversight:** Detailed disclosure allows for better oversight and accountability. Regulatory bodies, consumer advocacy groups, and the public can review and assess the fairness of toll pricing, leading to potential adjustments or regulatory changes if needed.

**Informed Decision-Making for Users:** With clear information on how tolls are set, users can make more informed decisions about their travel. For instance, understanding that tolls might be higher during peak times due to congestion pricing could influence drivers to travel during off-peak hours, thus helping to manage road congestion.

**Promotes Public Dialogue and Feedback:** Open disclosure facilitates public input and dialogue regarding toll setting. This engagement can provide valuable feedback to operators and regulators, potentially leading to improvements in toll policies and practices.

### Challenges of Full Disclosure

**Complexity of Information:** Toll pricing involves complex financial, economic, and technical data, which might be difficult for the general public to understand. Simplifying this information without losing critical details is a significant challenge.

**Commercial Sensitivities:** Some aspects of toll pricing, such as competitive factors or detailed financial models, might be sensitive from a business perspective. Operators may resist full disclosure to protect proprietary information or competitive advantages.

**Potential Misinterpretation:** There's a risk that disclosed information could be misinterpreted, leading to public confusion or backlash. This requires careful communication strategies to ensure that the information is clear and accurately conveyed.

**Regulatory and Legal Implications:** Full disclosure must be managed within the bounds of legal and regulatory frameworks, which may restrict the release of certain types of information. Navigating these constraints while trying to maximize transparency can be complex.

### Conclusion

The full disclosure of details regarding the setting of toll prices is fundamentally beneficial, promoting transparency, enhancing trust, and fostering greater accountability in toll management. However, achieving these benefits requires careful consideration of the content and format of the information disclosed, as well as strategic communication to ensure clarity and prevent misinterpretation. Balancing transparency with commercial sensitivity and regulatory compliance also presents a significant challenge that needs to be addressed thoughtfully. Overall, moving towards greater transparency in toll pricing is a positive step toward a more equitable and publicly supported toll system.

**What additional details would make you more confident that toll prices are set appropriately?**

### Cost Breakdown

**Construction Costs:** Detailed information on the initial and ongoing costs involved in building and maintaining toll roads.

**Operational Costs:** Annual operating expenses, including maintenance, management, and toll collection costs.

**Financial Costs:** Details on financing arrangements, including interest rates, loan terms, and sources of funding.



## Revenue and Profit Margins

**Annual Revenues:** Breakdown of revenue collected from tolls, specifying how these funds are allocated (maintenance, debt repayment, profit, etc.).

**Profit Margins:** Information on the profit margins of toll road operators, providing context on how these compare to industry standards.

## Pricing Methodology

**Basis for Pricing:** Explanation of the pricing model used, including whether it is based on distance, time of day, vehicle type, or congestion levels.

**Cost-Benefit Analysis:** Summary of any cost-benefit analyses conducted to justify toll rates, highlighting the economic, social, and environmental benefits.

## Traffic and Usage Data

**Traffic Volumes:** Regularly updated data on traffic volumes and patterns, showing how they influence toll pricing.

**Demand Forecasts:** Insights into how demand forecasts are made and their impact on toll pricing strategies.

## Regulatory Framework and Compliance

**Regulatory Approvals:** Details of the regulatory processes toll roads undergo, including approvals and periodic reviews by oversight bodies.

**Compliance Reports:** Regular reports on compliance with regulatory requirements and any penalties or actions taken against toll operators for non-compliance.

## Economic and Social Impact Assessments

**Impact Studies:** Results from studies assessing the economic impact on local communities and the broader region.

**Equity Assessments:** Analyses of how toll rates affect different demographic groups, particularly low-income populations.

## Public Consultations and Feedback Mechanisms

**Consultation Processes:** Information on how public consultations are conducted before setting or changing toll rates.

**Feedback Outcomes:** Summaries of public feedback received and how this feedback influenced toll pricing decisions.

## Comparative Analysis

**Benchmarking:** Comparisons with toll pricing on similar roads within the region or internationally, providing a benchmark for evaluating fairness and competitiveness.

## Future Pricing Strategy

**Long-term Plans:** Insights into any planned changes in tolling strategy, including potential price adjustments and the reasons behind them.

By providing these details transparently, toll road operators and regulatory bodies can significantly enhance public understanding and acceptance of toll pricing. This comprehensive approach ensures that stakeholders are well-informed and that toll pricing is seen as fair, justified, and aligned with public interests.

**Do you think that the proposed tolling principles adequately address the issues with the current tolling landscape? Please let us know why.**

## Efficiency

**Current Issue:** The existing toll system may not optimally manage traffic congestion, and tolls may not always reflect the true costs of road usage, leading to inefficient road use.

**Proposed Principle Impact:** By emphasizing efficiency, the proposed principles aim to ensure that tolls are set in a way that discourages excessive road use during peak congestion times and encourages the use of alternative routes or transport modes. This can lead to a more balanced use of the road network and reduce congestion.

### Fairness

**Current Issue:** Toll disproportionately affect certain groups, particularly those from lower socioeconomic backgrounds or residents in areas with fewer transport options, who may face higher toll costs.

**Proposed Principle Impact:** Fairness in the proposed principles seeks to address these disparities by ensuring that tolls are set in a manner that considers the economic impact on all users. This might include measures like capping tolls for frequent users or offering discounts for low-income motorists, aiming to reduce the financial burden on those most affected.

### Simplicity

**Current Issue:** The current toll system can be complex and difficult to understand, with various toll rates across different roads and unclear pricing methodologies.

**Proposed Principle Impact:** Simplicity in the new tolling principles would help ensure that toll schemes are easier for users to understand. A more straightforward, transparent tolling structure can increase public acceptance and compliance, reducing confusion and frustration among road users.

### Transparency

**Current Issue:** There is often a lack of clear information about how toll rates are determined, which can lead to mistrust and skepticism about the fairness and necessity of tolls.

**Proposed Principle Impact:** Enhancing transparency means providing clear, accessible information on how tolls are calculated, where the money goes, and how decisions are made. This openness can help build trust and ensure that stakeholders understand and support the tolling decisions.

### Adequacy of Addressing Issues

The proposed tolling principles appear well-designed to tackle the core issues in the current landscape. By focusing on these four key areas, they offer a holistic approach to reforming toll practices, making them more aligned with the needs and expectations of the community. However, the effectiveness of these principles in addressing the issues will largely depend on how they are implemented:

**Practical Application:** The principles must be translated into actionable strategies that tangibly affect tolling policies. This involves regulatory changes, technological upgrades, and possibly legislative actions.

**Stakeholder Engagement:** Successful implementation will require ongoing engagement with all stakeholders, including the public, government bodies, and private operators, to ensure that the principles are applied consistently and effectively.

**Monitoring and Adjustment:** Regular reviews and adjustments based on real-world outcomes are essential. The tolling system should be dynamic, with the flexibility to evolve based on traffic patterns, economic conditions, and public feedback.

In conclusion, while the proposed tolling principles are comprehensive and address many of the systemic issues with the current tolling landscape, their success will ultimately depend on committed and transparent implementation. Continuous monitoring and willingness to adjust policies as necessary will be crucial in ensuring these principles effectively resolve the issues they are designed to address.

**What are your views on extending or phasing out toll relief (noting that spending on toll relief limits government's ability to invest in other services and infrastructure for the community)?**

#### Benefits of Extending Toll Relief

**Direct Financial Support for Drivers:** Extending toll relief can significantly alleviate the financial burden on frequent toll road users, especially those from lower-income backgrounds or those who rely on tolled roads for their daily commute.

**Equity and Accessibility:** Toll relief can enhance equity by making transportation more accessible and affordable, reducing the disproportionate impact of tolls on certain populations.

**Political and Social Goodwill:** Maintaining toll relief can generate positive public sentiment and political goodwill, as it demonstrates government responsiveness to the economic concerns of its citizens.

#### Drawbacks of Extending Toll Relief

**Financial Sustainability:** Continuing toll relief programs can be financially unsustainable, especially if they are funded by general government revenues that could otherwise go toward broader public services or infrastructure projects.

**Opportunity Costs:** The funds allocated for toll relief could potentially be used for other critical infrastructure projects, such as public transportation improvements, which might benefit a broader segment of the population.

**Risk of Dependency:** Extended toll relief could create a dependency that may discourage consideration of alternative transportation or adjustments in travel behavior, such as shifting travel times to off-peak periods.

#### Considerations for Phasing Out Toll Relief

**Gradual Transition:** A phased approach to reducing toll relief can help mitigate the impact on those who are most dependent on the concessions. This could involve gradually reducing the relief provided or targeting it more narrowly to those in greatest need.

**Enhanced Public Transport Options:** Before phasing out toll relief, it could be beneficial to invest in improving public transportation options, giving people viable alternatives to driving on toll roads.

**Transparent Communication:** Clearly communicating the reasons for phasing out toll relief, including the benefits of reallocating funds to other community services or infrastructure, is crucial. This transparency can help manage public expectations and mitigate backlash.

#### Alternative Approaches

**Dynamic Toll Pricing:** Instead of broad toll relief, consider implementing more dynamic toll pricing that adjusts rates based on real-time traffic conditions, which can naturally reduce rates during less congested times.

**Targeted Discounts:** Shift from broad relief programs to more targeted discounts for specific groups such as low-income drivers, or those traveling for essential services like healthcare or education.

**Investment in Toll Road Efficiency:** Improve the efficiency and capacity of toll roads to reduce overall operating costs, potentially allowing for lower toll charges across the board.

#### Conclusion

The decision to extend or phase out toll relief should consider both immediate financial relief for drivers and long-term financial sustainability for the government. A balanced approach that gradually transitions away from broad toll relief programs towards more sustainable, targeted, and dynamic tolling practices might offer the best compromise. This approach can reduce the financial burden on vulnerable groups while freeing up resources for broader public infrastructure investments that benefit the entire community.

**What are your views on the proposed new toll relief principles i.e., implementing means-tested toll relief, considering the availability of alternative transport options, not making tolls free and applying toll relief network wide? Do they adequately address the issues with current toll relief schemes?**

#### Implementing Means-Tested Toll Relief

**Advantages:** Means-testing ensures that toll relief is provided based on financial need, which can target assistance to those who need it most, such as low- income drivers. This approach enhances equity by reducing the burden on those less able to afford tolls while maintaining toll revenues from those who are more financially secure.

**Impact on Current Issues:** This addresses a significant flaw in current toll relief schemes that might not differentiate based on users' ability to pay. Means- testing can prevent wealthier drivers from benefiting disproportionately from subsidies intended to help those in economic need.

#### Considering the Availability of Alternative Transport Options

**Advantages:** Taking into account the availability of public transport or other travel options can help ensure that toll relief is given where it's most needed— where no viable alternatives exist. This could encourage the use of public transport where it is available and only provide relief where dependence on tolled roads is higher.

**Impact on Current Issues:** This principle directly addresses the inefficiency of blanket toll reliefs that do not consider individual circumstances or the broader transport infrastructure. It aligns toll relief with strategic transport planning, potentially reducing congestion on tolled roads.

#### Not Making Tolls Free

**Advantages:** Avoiding making tolls completely free maintains the principle that road users should contribute to the costs of the infrastructure they use, albeit at a reduced rate if necessary. This can help maintain a revenue stream from tolls, ensuring funds are still available for road maintenance and improvements.

**Impact on Current Issues:** This principle addresses the sustainability concern of current toll relief schemes by ensuring that toll roads do not become a financial burden on the state or lose their role in managing traffic through pricing mechanisms..

#### Applying Toll Relief Network-Wide

**Advantages:** Implementing toll relief across the entire network ensures fairness and simplicity, preventing a patchwork of different tolling regimes and confusion among road users. It ensures that all eligible users benefit from relief, regardless of which part of the network they use.

**Impact on Current Issues:** This approach addresses the issue of inconsistency and geographical inequity in current toll relief applications, where some areas or roads might offer different levels of relief compared to others.

#### Conclusion

Overall, the proposed new toll relief principles significantly enhance the current system by focusing relief efforts more effectively and sustainably. Means-testing and considering the availability of alternatives introduce a level of fairness that current systems may lack, ensuring that help is given where it is most needed and not misapplied to those who do not need financial assistance to pay tolls.

Furthermore, by not making tolls completely free and applying relief network-wide, these principles balance the need to maintain toll revenue (and by extension, road quality and traffic management) with the goal of making road use more affordable for those in need.

These principles appear well-designed to streamline and improve the efficacy of toll relief schemes, aligning them more closely with broader transportation policy goals like reducing congestion and promoting the use of public transport where feasible.

What are your views on the proposed improvements to motorist experience i.e., online trip planning, improved signage, historical and future toll usage and increased visibility of toll-related information?

#### Online Trip Planning

**Advantages:** Providing an enhanced online trip planning tool that integrates toll costs can significantly help motorists in planning their routes more efficiently. Such tools can offer real-time data on traffic conditions, estimated toll costs, and alternative routes, allowing drivers to make informed decisions based on cost, time, and convenience.

**Impact:** This improvement directly addresses issues of accessibility and user- friendliness in the current system. It empowers motorists to manage their travel expenses better and plan trips that suit their budget and schedule, potentially reducing travel-related stress and increasing satisfaction with the toll road system.

#### Improved Signage

**Advantages:** Better signage on toll roads and at key decision points can help ensure that motorists are well-informed about upcoming tolls, toll booth locations, and price changes. Clear, visible, and timely signage can prevent last-minute lane changes and reduce accidents or traffic congestion caused by drivers reacting to unexpected toll notices.

**Impact:** This initiative enhances safety and predictability, addressing common complaints about inadequate or confusing road signs related to tolls. Improved signage contributes to a smoother driving experience and helps avoid the frustration and potential hazards associated with poorly marked toll roads.

#### Historical and Future Toll Usage Visibility

**Advantages:** Allowing motorists to access information on their historical and projected future toll usage can play a critical role in budgeting and financial planning. This transparency helps individuals and businesses alike to better forecast their expenses and manage their finances with greater precision.

**Impact:** Providing this information can significantly increase transparency, a key concern among toll road users who often feel they lack control over their toll- related expenditures. It can also foster greater trust in the toll management system when users can track their payments and understand their spending patterns.

#### Increased Visibility of Toll-Related Information

**Advantages:** Enhancing the visibility of toll-related information, including pricing structures, toll location maps, and payment options through various platforms (such as mobile apps, websites, and physical information boards), ensures that all motorists, regardless of their tech-savviness, can access necessary toll information.

**Impact:** This broad approach to information dissemination addresses accessibility and equity issues, ensuring that every motorist has the opportunity to access toll information in a format that is convenient for them. It can help reduce barriers for less tech-oriented drivers while catering to the needs of a digitally connected populace.

#### Conclusion

The proposed improvements to the motorist experience are well-targeted to address key areas of concern among toll road users: accessibility, transparency, and user- friendliness. By enhancing online resources, improving physical infrastructure like signage, and providing detailed user-specific data, these initiatives collectively work towards creating a more inclusive, informative, and responsive toll system.

Such enhancements not only improve individual experiences but also contribute to broader goals of efficient traffic management and public satisfaction with toll road infrastructure. Continued investment in these areas will be crucial for maintaining and improving the public's perception and use of toll roads.

## Do you think this will better inform your decision to use a toll road?

### Online Trip Planning

An enhanced online trip planning tool that includes real-time traffic data and estimated toll costs offers a significant advantage for drivers planning their journeys. By having access to this information, motorists can compare the cost and time implications of different routes beforehand, allowing them to choose the most cost-effective or time-efficient route. This might encourage more strategic use of toll roads when they offer clear benefits in terms of time saved.

### Improved Signage

Improved signage along toll roads and at key decision points helps to eliminate any last-minute confusion about routes and toll fees. This can be particularly important for less frequent users of toll roads or visitors to the area who aren't familiar with the toll locations. Better signage ensures that motorists can make informed decisions well in advance of reaching a toll booth or toll road entrance, reducing the stress associated with unexpected tolls and potentially encouraging more planned use of toll roads.

### Historical and Future Toll Usage Visibility

Access to data on historical and projected future toll usage empowers motorists to understand their spending patterns and anticipate future costs. This visibility could lead to more thoughtful decisions about using toll roads, particularly for regular commuters who might benefit from budgeting their travel expenses.

Knowing how much they are likely to spend could lead some drivers to adjust their usage based on financial considerations or explore alternative travel options if the costs become too high.

### Increased Visibility of Toll-Related Information

By providing easy access to comprehensive toll-related information, including detailed maps, pricing structures, and payment options, motorists are better equipped to understand when and why they might be charged. This increased visibility helps demystify the toll system, making it more transparent and understandable. Drivers are more likely to use toll roads when they feel confident that they understand the system and can trust that there are no hidden surprises.

### Overall Impact on Decision Making

Together, these improvements create a more user-friendly and transparent tolling environment. Motorists who are better informed are more likely to make use of toll roads when they perceive them as offering value for money or a more convenient travel option. Additionally, these enhancements could potentially shift public perception positively, leading to greater acceptance and use of toll roads as part of routine travel planning.

In summary, the proposed improvements would not only better inform decisions to use toll roads but could also enhance overall user satisfaction and trust in the toll system, promoting more rational and efficient use of transportation resources.

## What other features would you like to see implemented?

### Dynamic Pricing Alerts

Implement a system that sends real-time alerts to motorists about current toll prices, especially when dynamic pricing is in effect. This could be integrated into existing navigation apps or a dedicated toll road app, providing drivers with up-to-date information to make cost-effective travel decisions on the fly.

### Loyalty Programs for Frequent Users

Introduce loyalty programs or frequent user discounts that provide benefits to regular toll road users, such as reduced rates after a certain number of trips. This could incentivize consistent use and reward loyal customers, similar to frequent flyer programs in the airline industry.

### Integrated Multimodal Transport Planner

Develop a comprehensive transport planning tool that integrates toll road information with public transport options. This planner would help users compare the time and cost of travel across different modes (driving, bus, train), encouraging a more holistic approach to transport planning.

### Automated Payment Options

Enhance the convenience of toll payments by supporting more automated payment methods, such as mobile payments or integration with digital wallets. This could reduce the need for physical toll tags or stopping at toll booths, streamlining the toll payment process.

### Environmental Impact Information

Provide information about the environmental impact of different travel choices, including the carbon footprint associated with toll road usage versus alternatives. This could help environmentally conscious drivers make more sustainable choices.

### Advanced Vehicle Classification Technology

Implement more advanced vehicle classification technologies that can accurately distinguish between different types of vehicles and charge tolls accordingly. This could ensure that tolls are more fairly assessed based on vehicle type, size, and potential road wear.

### Customer Service Chatbots

Deploy AI-powered chatbots on toll road websites and apps to provide instant assistance with queries about toll charges, account issues, or route planning. This would improve customer service responsiveness and accessibility.

### Feedback Mechanism for Road Conditions

Allow users to report road conditions or incidents via the toll road app or website. This could help toll road operators quickly address issues such as potholes, debris, or accidents, improving safety and driving conditions for everyone.

### Variable Toll Discounts for Off-Peak Hours

Offer deeper discounts for off-peak hours to more aggressively manage congestion. This could encourage more drivers to shift their travel times to less busy periods, enhancing overall traffic flow.

By incorporating these features, toll road systems can not only enhance the motorist experience but also promote safer, more efficient, and environmentally friendly travel options. Each of these features adds layers of convenience, information, and incentives that can make toll roads more appealing and functional for a diverse range of users.

## Disclaimer

This Report has been prepared by Professor Allan Fels AO and Dr. David Cousins AM as part of the Independent Toll Review commissioned by the NSW Government. Professor Allan Fels AO, Dr. David Cousins AM, and the NSW Government do not guarantee or warrant, and accept no legal liability whatsoever arising from or connected to, the accuracy, reliability, currency, or completeness of any material contained in this Report. Readers of this Report are responsible for making their own assessment of the material and should conduct their own inquiries and seek their own advice when making decisions related to the material contained in this Report. This Report does not represent approved policy directions of the NSW Government.

This publication is protected by copyright. With the exception of (a) any coat of arms, logo, trade mark or other branding; (b) any third party intellectual property; and (c) personal information such as photographs of people, this publication is licensed under the Creative Commons Attribution 3.0 Australia Licence.

The licence terms are available at the Creative Commons website at:  
[creativecommons.org/licenses/by/3.0/au/legalcode](https://creativecommons.org/licenses/by/3.0/au/legalcode)

NSW Treasury requires that it be attributed as creator of the licensed material in the following manner: © State of New South Wales (NSW Treasury), (2024).