

# WESTCONNEX M4 EAST ENVIRONMENTAL IMPACT STATEMENT

## SUBMISSION by JOHN HYDE

### Preamble

I oppose WestConnex.

The government has avoided public scrutiny, abused due process, ignored best practice, and failed to justify this massive expenditure of public funds on this project. For these reasons, the EIS should be rejected.

I recognise, however, that the Minister for Planning, being a member of the government proposing the project is unlikely to do so. As well as arguing against WestConnex I have therefore also made comments on alternatives and adjustments to the M4 East as proposed.

My comments on the WestConnex M4 East Environmental Impact Statement (EIS) fall under six headings:

1. Comments on process
2. Comments on WestConnex
3. Alternatives to WestConnex
4. Alternative design for the M4 East
5. Support for submission by Ashfield Council
6. Ameliorating the local effects of WestConnex M4 East as proposed

Each contains bolded and italicised comments or recommendations.

My submission ends with a number of Concluding Comments.

### 1. Comments on process

This is a huge infrastructure project with a huge investment of public funds, yet ***the NSW Government has trashed due process since the outset with WestConnex.***

#### 1.1 It has signed a contract to construct the M4 East before receiving planning approval though the EIS process.

This makes an absolute mockery of approval process. What Minister for Planning is going to refuse permission or substantially change the proposal in such a circumstance?

## **1.2 It has never established a business case nor published a cost benefit analysis for the project.**

The 'WestConnex Business Case Executive Summary' of September 2013 is not an evidence based business case, which could be subject to independent analysis. It a public relations exercise based on assertion, without substantiation for those assertions.

## **1.3 The Government has fought tooth and nail to maintain secrecy and to avoid public scrutiny of this project.**

For example, in mid 2014 the Government did a deal with the Shooters and Fishers party to avoid an Upper House Inquiry, initiated by the Greens and supported by Labor, by agreeing that Ashfield Park would not be touched (a part of the Park was to have been taken for tunnel portals). ('WestConnex inquiry out as MP cuts deal on park', SMH, 26 June 2014)

Concerns about secrecy in major roads projects were expressed eloquently by the SMH's business writer, Michael West (Secrecy is the real toll road scandal', Businessday, 12 September 2012). He concludes "Even before the case for a road project is made, a 'public sector comparator' should be done by government to assess whether the money might be better spent on rail than road, and then a comparison of funding and structuring models of each". The NSW government has failed to do this.

The previous Chairman of the Productivity Commission, Bill Scales, has called for all infrastructure projects above the value of \$1bn to subject to a cost benefit analysis, and this be published before the project proceeds ('Cost-benefit analysis urged for all projects of over \$1bn', SMH, 6 August 2014). The NSW government has manifestly failed to follow this suggestion for good practice with WestConnex.

Now it seems the government's replacement of the WestConnex Delivery Authority with creation of the Sydney Motorway Corporation is another way to avoid public scrutiny ('WestConnex buried from public scrutiny', SMH, 17-18 October 2015).

## **1.4 The Government's its own Auditor General has serious concerns about the process being followed in developing WestConnex.**

The NSW Auditor General's 2014 'Performance Audit of WestConnex' (<http://www.nsw.gov.au/news/westconnex-assurance-to-the-government>) was savage (in bureaucratic language) in its criticisms of how WestConnex has been developed. Among other things it found that the government was not complying with its own Major Projects Assurance Framework, conflicts of roles within government agencies developing WestConnex, and lack of external independent review.

The Auditor General's report noted that the Gateway Review Panel report on the preliminary business case did not receive enough information to form a view on whether it is a worthwhile and prudent investment. The Panel's traffic light risk ratings against the Gateway criteria were all yellow and red (important and urgent, and critical and urgent to address), with no green lights. The project should not have proceeded further without addressing these concerns.

The Auditor General reviewed the final business case and found deficiencies that a full Gateway review should have found. “These deficiencies related to the way the business case dealt with risks around traffic projections, project cost, economic benefits, financial analysis, governance arrangements and the procurement strategy”. It does not get much more damning than that! The project should not have proceeded further without addressing these concerns.

In spite of their serious nature, the Minister for Roads dismissed the concerns of the government’s own independent Auditor General out of hand, instead of taking the Auditor General’s concerns seriously. Nothing better illustrates the abuse of process by the government with regard to WestConnex. The SMH even wrote an editorial criticising the government on this (‘Baird government’s dismissal of report alarming’, 12 January 2015).

The project should not have proceeded further until the Auditor General’s concerns were addressed, and the Auditor General’s requirements for Gateway reviews had been complied with. Because the government failed to do so, the M4 East EIS is built on sand, and we can have no confidence in it.

***The staff in Planning responsible for assessing the EIS should read the Auditor General’s report on WestConnex.***

***The EIS should be rejected on the grounds that the WestConnex has been developed contrary to the Government’s own Major Projects Assurance Framework.***

Similar concerns about governments’ rushed and ill conceived decisions on major infrastructure projects was expressed by no less Peter Harris, Chairman of the Productivity Commission. (‘Politicians accuse of rushing on big projects’, SMH, 13 September 2014)

### **1.5 The Government has just gone through the motions of community consultation. It is not interested in community views, and is intent on bulldozing through its road come what may.**

At the public meeting at the Enmore Theatre on 23 February 2015, there were prolonged loud and angry protests, questions and heckling from the floor. This opposition to WestConnex was just airbrushed from the records, to make it seem that that a calm consultation had taken place.

The WestConnex Delivery Authority (WDA) however learnt from this experience. It held subsequent meetings inside licensed clubs (see 1.6), where protesters could be kept out or thrown out (which did happen).

***The stuff in the EIS about community consultation is nonsense.***

### **1.6 The WDA information sessions were a complete waste of time, and just a means to say they have consulted or informed the public.**

Another meaningless public relations exercise. For example, I attended the one at Wests in Ashfield. I had a number of questions that those present could not answer, so these were dutifully taken down by scribes with a promise they’d get back to me. They never did.

The WDA information service developed a technique of responding to my specific emailed questions by inviting me to discuss them over the phone rather than provide me with a written response. I can only interpret this as a reluctance to put their responses in writing on the public record.

### **1.7 The EIS is not the appropriate opportunity to comment on WestConnex.**

In lieu of a meaningful opportunity to comment on the concept of WestConnex, the WDA and WestConnex contractors in recent times have deflected questions and avoided giving information by saying it will all be in the EIS. Commenting on the EIS is not the same as commenting on WestConnex, especially as the Government has corrupted the planning process by signing a contract for the construction of the M4 East before having received planning permission.

### **1.8 There has been an inadequate time given to comment on the EIS.**

The EIS is massive and highly technical. It is hard for individuals to find time in busy lives to absorb the document and make meaningful comment. For organisations such as community groups and local Councils, they have also to go through a process of agreeing the organisation's positions on a whole number of things included in the EIS before they can respond.

The statutory minimum of 30 days is ridiculous and held up by the Government as the benchmark, and we that should be grateful for any increase on that. The Minister for Planning's initial 45 days was derisory for this project and indicates to me pressure to approve the project with minimal scrutiny now the contract has been signed.

Intense lobbying of the Minister resulted in the 45 days being increased to 55 days, but this is not really adequate. The period should be 90 days, especially for a project of this magnitude. When I worked in Wales the statutory minimum for public consultation on policy was 90 days, and WestConnex is public policy on a massive scale.

***Conclusion: This project has no credibility. The Government has failed to present and argue its case for WestConnex, and has indeed done its best to avoid public or parliamentary scrutiny of the project. The whole process has been disturbingly anti-democratic.***

### **1.9 An opportunity for transparency by Planning**

***I request the Department of Planning and Environment publish on its website all the submissions it receives on the M4 East EIS, together with a balanced summary thereof.*** The former is important for transparency as inevitably editorial decisions will be made in the preparation of a summary.

## 2. Comments on WestConnex

### 2.1 WestConnex is poor strategic policy

Australia is almost totally dependent on imported oil. This comes to us from unstable parts of the world over vulnerable sea lanes. If that supply is interrupted then economic activity in Australia will rapidly grind to a halt. Especially as the Australian government does not have the strategic wit to stockpile oil, say three months' supply, as other countries have done.

People point to electric cars, but these just move the source of energy generation. And at the moment most electricity in Australia is generated using coal, contributing to global warming. There will be increased international pressure on Australia to reduce the use of coal.

We have to reduce our oil dependence, and burning of fossil fuels, by reducing energy consumption and using alternative energy sources. In terms of transport this means reducing car dependence and favouring more efficient public and active transport solutions over energy intensive private cars.

***WestConnex encourages car dependence and the use of fossil fuels***

### 2.2 WestConnex is an outdated concept and poor planning policy

Far from ex PM Abbott's ideological commitment to the primacy of the car over public transport and ambition to build the roads of the 21<sup>st</sup> C, WestConnex is a mid 20<sup>th</sup> C concept.

I recently saw a comment favourable to WestConnex saying that this is fulfilment of a plan made 60 years ago. Precisely. 60 years ago was in the age of cheap and abundant oil, of rising affluence at the start of the post war boom. Sydney was a low density city of 1.5m people, and people aspired to the quarter acre block in the suburbs. None of this now pertains. We've had 'oil shocks' and increased prices. We are probably past 'peak oil', a concept not dreamed of 60 years ago. And Sydney is now a city of 4m people rapidly growing towards 6m, with increasing population density and people increasingly living in multi unit dwellings.

Increasing population density and relying on private road transport is fundamentally at odds with each other. One can never build enough roads, which become congested as soon as they are built. ***The solution for a city the size of Sydney is increasing density coupled with mass transit systems and active transport solutions.***

This is now recognised the world over, with sophisticated cities, not only in Europe, but in the US and Asia, building mass transit systems. Consultancy companies, McKinsey and SGS Economics and Planning, have pointed out how Sydney is falling behind other cities in Asia and elsewhere, and how this impacts on our economy and claims to be a 'global city' ('Public transport still the key to the future', SMH, 14-15 June 2014). The latter point is explored by SMH economics writer Matt Wade, who concludes that effective mass transit is required for the 21<sup>st</sup> C knowledge economy ('Smart cities need good transport to lure wise workers', SMH, 23 April 2014). A point he had also made in a previous article ('Infrastructure woes drag down Sydney's ambition to be a global city', SMH, 13 April 2014).

Good public transport systems and active transport solutions such as bicycle paths encourage people who have the option to use these over using the private car, freeing up road space for trucks and tradies who have to drive as part of their daily business.

That WestConnex is not based on rational strategic transport planning is explained in Lyall Kennedy's excellent paper surveying the historical context for WestConnex (<http://m4eis.org/2015/10/29/narrow-interests-plus-public-transport-failure-behind-westconnex-m4-east-lyall-kennedy-submission-part-2/>). Kennedy points out that the Long Term Transport Master Plan did not originally include WestConnex; it was amended later to retrofit WestConnex as a centrepiece, arguably distorting transport investment in Sydney.

***The M4 East is a revival of the 2003-04 plan to extend the M4 to the CBD. The earlier scheme did not proceed due to concerns over economic viability and environmental impacts. The latest iteration, in the EIS, is no better in these regards, so should be similarly abandoned.***

## **2.3 WestConnex is a low priority for Infrastructure Australia**

The WestConnex EIS under consideration has come about because of the Abbott Government sidelining Infrastructure Australia, the technocratic body that should be making evidence based decisions on infrastructure projects. WestConnex was way down their list of priorities.

***WestConnex should be referred to Infrastructure Australia before it proceeds further, for objective assessment and prioritisation against other infrastructure projects, free of political interference.***

## **2.4 WestConnex is not economically viable**

### Capital costs:

The WestConnex Business Case Executive Summary of September 2013 gives a benefit-cost ratio of 2.55 (p20). This is a total fiction.

Firstly, costs have increased. The Executive Summary estimates the total cost of WestConnex to be less than \$11bn (p21). The latest estimate is \$15.4bn, an increase of a third in two years, and 50% since the project was first announced in 2012 ('WestConnex motorway costs soar by another \$500m', SMH, 24 June 2015). And this cost is bound to increase significantly, as it always does with major infrastructure projects.

Secondly, the stated economic benefits are extremely flaky. These are stated as over \$25bn on p21, of which over \$15bn are 'travel time savings'. This is commonly simplified to "benefits of more than \$20bn", a conveniently round and easily memorable figure that the media has obligingly repeatedly regurgitated as fact. I doubt this figure for a number of reasons:

- the Government has never provided substantiation for these figures
- some of the stated benefits seem to be duplicative and definitely vague. What for example does 'Environmental and indirect benefits and residual value' mean?

- what does 'time travel savings' mean? The figure is likely to be calculated on savings of a few minutes on millions of journeys of work. This is private time, of people being able to leave a home a little later and arriving home a little earlier. I do not consider this to be an economic benefit; it is just a way of inflating the figures. The real economic benefits are the productivity benefits, which are stated as less than \$3.5bn

If one takes out the unsubstantiated and dubious 'Time travel savings', the benefit-cost ratio becomes less than one.

Infrastructure Australia's assessment of WestConnex earlier in 2015 shows a significant fall from the 2.55 benefit-cost ratio of September 2013 to 1.8. Infrastructure Australia however pointed to serious flaws in the WDA methodology, which will reduce the figure further ('Thumbs up for WestConnex', SMH, 28 February 2015).

The 1.8 benefit-cost ratio figure is quoted on p3-10 of Volume 1-A of the EIS, but without any explanation of how this figure is arrived at. It is highly likely that this figure has been manipulated to be on the high side, and therefore subject to the criticisms I have made above. And as point out in 2.8 below, no one can be sure on the traffic projections, and experience with other motorway projects in Australia time and again is that these turn out to be very optimistic, to justify the proponents' proposal.

At the end of the day the benefit-cost ratio for WestConnex is likely to be close to the 0.45 that was revealed by the change in government in Victoria to be the case for the comparable East West Link project in Melbourne.

***WestConnex is a poor investment, with a benefit-cost ratio is likely to be significantly less than 1.0.***

#### Recurrent costs:

A budget has never been produced to shows that the tolls collected will be sufficient to run the motorway, and produce a surplus sufficient to fund Stage 3. The ongoing costs are significant:

- the cost of electricity to power lights, signs, ventilation fans, water pumps
- staff for monitoring and motorway and traffic management
- road and tunnel maintenance
- the imputed cost of capital ie how much the government could earn by investing the amount spent on building WestConnex

The government is in a dilemma. The higher it puts tolls to cover running costs and generate a surplus to fund Stage 3, the more drivers will avoid WestConnex and use other routes to avoid the tolls. Which rather defeats the purpose of WestConnex to take traffic off the surface. Or it can reduce tolls to encourage people to use WestConnex, but run the risk of reducing revenue.

***It is doubtful that toll revenue will be sufficient to fund Stage 3.***

## 2.5 Stage 3 is unfunded

The Commonwealth and State government's have only put in enough money to fund Stages 1 and 2 (the latter by means of a loan from Commonwealth to State). Stage 3 is currently unfunded. There is something like a \$10bn shortly in funding to complete WestConnex.

The whole argument for WestConnex depends on completing the whole motorway, that is including Stage 3. Not to do so, will mean that billions of dollars of taxpayers' money will have been spent moving traffic jams a few km, at enormous social and environmental cost to suburbs such as Ashfield, Haberfield and Concord. This includes loss of peoples' homes with inadequate financial compensation, destruction of heritage buildings, destruction of businesses, immense scarring of the suburban landscape, and increased air and noise pollution. For what purpose?

***It is reckless in the extreme for the government to embark on building individual stages of WestConnex without assured finance to complete the whole project. The project should be put on hold until it can demonstrate it has the funds to complete it.***

## 2.6 WestConnex will distort and undermine state finances

Michael West, business writer for the SMH has reported on an analysis done on behalf of Fairfax Media by actuary, Ian Bell, on the comparative costs of urban motorways ('Light shed on the cloudy costs of roads', 11 August 2014). One of Bell's conclusions was that, unsurprisingly, the capital costs for roads jump significantly once tunnelling is involved. He found that WestConnex was two and a half to three times as expensive to build as the M7. As the government could not set tolls on WestConnex two and a half to three times the level of the M7, as no one would use WestConnex, the latter will require hundreds of millions of dollars of funding to meet revenue shortfall. This shortfall will have to be picked up by the NSW budget.

It is highly likely that the state (possibly with Commonwealth assistance) will have to fund the completion of project and provide ongoing subsidy for its operation. In addition WestConnex will induce more traffic and therefore induce more funding for the widening of roads feeding and taking traffic from the tunnels.

So far, the private sector has steered well clear of WestConnex, having previously had its fingers burnt with projects such as the Lane Cove and Cross City tunnels. WestConnex is therefore not funded using a public private partnership (PPP). Taxpayers are taking the entire risk, with private capital sitting back and seeing what happens. If they think they can turn a buck by renting or buying sections of WestConnex they will do so. Otherwise taxpayers will be left carrying the can.

The NSW Greens Commissioned a financial analysis which showed that even allowing for estimated toll revenue, depreciation and operating costs means that WestConnex will make an annual loss \$29m, and the project will carry an interest burden of \$630m pa on that loss ('WestConnex will be a disaster: Greens', AFR, 27 November 2014). ***It is likely therefore that taxpayers will have to subsidise WestConnex for over half a billion dollars per annum into the foreseeable future.***



Another option is that the government will be so desperate to fund Stage 3 and to get operating costs off its books, that it will sell the rights to earlier stages to a private motorway operator at a reduced price. That is for less than the publicly funded capital cost of building the road. This still means that the government and taxpayers will have paid a massive subsidy to build this one road.

Stephen Greaves, associate professor in transport management at Sydney University, has pointed to the cost of WestConnex crowding out funding for other infrastructure including public transport ('WestConnex may gobble up rail money, says expert', SMH, 12 June 2014).

This is all supported by the writings of Ken Davidson, respected Victorian economics writer on Melbourne's own version of WestConnex, the East West Link and its previous iterations ('Why the east-west road tunnel is a stinker' The Age, 28 November 2011; 'Why tunnel vision will cost all Victorians, big time', The Age 24 June 2013; 'East West funding part of a bumpy road for the future', 7 May 2014 – all of these are available on line). The history of the East West Link sounds depressingly similar to that of WestConnex, the secrecy, the lack of a business case, cost benefit analysis etc.

The major point however is that, as it will be for NSW with WestConnex, that "The East West Link will be a financial and environmental disaster" and "It will cripple the state's fiscal position for many years". Victorians had a narrow escape from a huge financial burden with the change in government and cancelling East West Link. Would that we in NSW were so lucky.

***The cost of WestConnex is so huge that the public funding required will be a drain and distort the state budget for years to come, precluding funding on other services, including public transport.***

## **2.7 EISs for individual stage are not valid**

The arguments that the government mounts on the benefits of WestConnex depends on the completion of all three stages, 1, 2 and 3. How then can one conduct an EIS on an individual stage? Either the benefit-cost ratio is calculated on that individual stage such as the M4 East, or an EIS conducted for the WestConnex as a whole.

***The EIS should be for the whole of WestConnex, not for individual stages, such as the M4 East.***

## **2.8 WestConnex is based on dubious traffic projections**

The whole WestConnex proposal, its economics, its benefits and its costs, hinge on credible traffic projections. Traffic projections are the basis for:

- the road's benefit-cost ratio
- the economics of the road through toll revenue
- projecting the impact on Parramatta Road and other surface roads
- projecting air and noise pollution, and therefore the road's health impacts

The government has employed AECOM to do the traffic projections for the M4 East. This is the same company that had to pay massive compensation for its traffic projections in Australia.

In September 2015 banks which had financed Brisbane's failed Clem7 RiverCity tunnel, successfully sued AECOM for its inaccurate traffic projections, settling for \$280m (the banks had alleged that AECOM's work had cost them \$1.5bn. In addition, 650 investors are pursuing a class action against AECOM on the same matter. Incredibly, it is alleged that AECOM had failed to reveal earlier forecasts it had developed for Brisbane City Council that showed travel volumes significantly lower than those in the RiverCity Disclosure Statements.

The experience with Brisbane's RiverCity tunnel must throw doubt on the accuracy of AECOM's traffic projections for the M4 East.

But failures of traffic modelling are more endemic than those of AECOM in Brisbane. A brilliant paper by Anthony McCosker, together with references to the literature, at <http://m4eis.org/2015/10/17major-flaws-in-westconnex-eis-traffic-report/> shows that **traffic modelling is not to be relied on and should not be used as a justification for road projects**. In summary, "In attempting to model the future, traffic modelling makes a number of assumptions to produce what can sometimes seem like absolute and certain figures. In contrast, the number of assumptions, simplifications and estimations in the modelling means that the figures produced are just one possible outcome of many."

McCosker gives three examples that warn against traffic projections justifying road projects:

- the Clem 7 example, where AECOM predicted over 100,000 cars a day usage by 2011, despite predicting just 18 months previously, 57,000 cars per day. Actual traffic usage in 2011 was less than 24,000 cars per day
- the Cross Sydney Tunnel became insolvent in 2006 due to traffic modelling predicting 90,000 cars per day, compared to actual usage of 20,000 cars per day
- the two companies responsible for the Lane Cove Tunnel are being sued after the tunnel becoming bankrupt soon after completion in 2009 due to actual usage less than half that predicted

There is also history in Australia of consultants justifying traffic projections that the government and private sector want to hear. This is easily achieved by changing the assumptions in the model.

A recent episode of the ABC TV's 'Utopia' program is prescient on how government's will manipulate the assumptions behind the data to get the result it wants for road projects.

The SMH reported on 12 and 13 August 2014 ('How traffic numbers went into a dark tunnel' and 'Audit chief Shepherd 'pumped up' traffic figures', respectively) the real life example of traffic forecasts for the Lane Cove Tunnel, now subject to litigation.

***The M4 East traffic projections cannot be relied upon, and this goes to the heart of the economic justification for WestConnex and its financial viability.***

***Traffic projections are so fundamental to WestConnex and its EIS that to try to get as accurate projections as possible, the NSW Department of Planning and Environment should request two further independent assessments of traffic numbers be conducted before the EIS is assessed, and publish the assumptions on which they are based.***

## **2.9 WestConnex will not reduce traffic congestion**

The common misperception is that by spreading existing traffic over a bigger road surface will reduce traffic density and therefore congestion. Wrong.

The phenomenon of induced traffic will mean that the additional road capacity created by WestConnex (essentially a duplication of Parramatta Road) will soon fill, as people are encouraged to use their cars over other transport modes. After a short period, congestion will return to its present level or worse.

An excellent brief explanation of 'induced traffic' (and 'peak car use', reached in Australia in 2004), together with references to the literature, is at <http://m4eis.org/2015/09/30/note-explaining-automobile-dependence-peak-car-use-and-induced-traffic/>. I recommend those in Planning assessing the EIS read it, as it really destroys the whole justification for WestConnex.

The only way to reduce traffic congestion is to encourage people who can, to use other transport modes by making these relatively quicker than road transport.

The current experience of the closure of George Street in the CBD is instructive. There, traffic congestion has not got worse, and may even have got better, as people adjust their travel behaviour.

***Now is the time, before the massive investment in WestConnex, is to break the paradigm of just building more roads in an endless quest to reduce traffic congestion, and instead invest this money in an expansion of public transport provision.***

## **2.10 WestConnex is not an integrated transport proposal**

In spite of government rhetoric to 'sell' the road, and pretty lines on maps with vague promises to look at light rail along Parramatta Road, it has made no commitment to improved public transport as part of WestConnex. It is just a very expensive road.

The nearest thing to a commitment to improved public transport along Parramatta Road, is a dedicated bus lane and faster buses. Big deal; painting a road lane red. In the context of Australia's biggest road project?

***WestConnex should include a funding commitment for improved public transport as part of the integrated transport proposal it purports to be. The M4 East EIS should not be approved until it includes funding allocated for specified improvements to public transport along its route.***

## 2.11 WestConnex will not take traffic off surface roads

The detailed design of WestConnex now emerging shows that the government's selling line that traffic will be magically taken off the ground and whisked through the fibre optic cable that is WestConnex (watch the early promotional videos) is a myth. It might take traffic off Parramatta Road where the tunnel duplicates it, but entrance and exit portals will increase surface traffic in their vicinity, where vehicles are exiting and entering tunnels.

For example, at the Parramatta Road exit portal, five lanes of eastbound traffic merges into three. The additional volume of traffic is discharged into the currently most congested part of Parramatta Road, between Liverpool Road and Norton Street. Going west, additional traffic will be encouraged onto Parramatta Road trying to access the WestConnex tunnel.

Leichardt Council has commissioned an independent traffic report which shows that WestConnex will increase congestion at the junctions of Parramatta Road with Sloane, Norton and Crystal Streets, and Dobroyd Avenue at Timbrell Drive to level 7 (the highest level). The report also outlines concerns about WestConnex causing increased rat running through Leichhardt and Annandale ('Council unveils 'smoking gun' on WestConnex Traffic' (SMH, 20 October 2015).

To prevent traffic backing up into the tunnel, RMS will have to adjust the traffic lights at these junctions to favour east-west over north-south traffic. This will create more traffic congestion on the latter routes.

The scenario for the Wattle Street portals is similar as that for Parramatta Road. The Wattle Street portals will discharge and attract more traffic onto the already congested City West Link. The likely outcome of this is further traffic management measures to stop traffic backing up into the tunnel, by favouring City West Link traffic over that attempting to cross or join it from adjoining surface roads.

It will also increase pressure to re-open Lilyfield Road to through traffic, which will be severely detrimental to peoples' amenity on that road as it is very steep.

The EIS fails to adequately consider the impact of WestConnex on adjoining surface roads. It fails to do so because of an unpalatable truth. It is likely that the WestConnex tolls will force many people to continue to use the un-tolled Parramatta Road and increased rat running on parallel alternative routes.

In my area I expect extra traffic on the essentially local roads running parallel to the railway from Burwood through Croydon to Elizabeth Street and onto Liverpool Road or on through Summer Hill and points east. To the north there will be increased traffic along Ramsay and Marion Streets through Haberfield and Leichhardt into the city. There will increased pressure to widen and/or impose parking restrictions along those routes, to the detriment of homes and businesses. Frederick Street already has an RMS road reservation along its western side. And so it will go on, increased traffic through residential areas of the Inner West.

The public transport advocacy group, Ecotransit has analysed the effect of WestConnex on surface roads, particularly Parramatta Road, using figures in M4 Widening and M4 East EISs (<http://m4eis.org/2015/10/14/eis-admits-deterioration-in-parramatta-road-traffic-after-m4-east/>). The details are in the paper, but in summary ***the amount of traffic on Parramatta Road will increase, and congestion at junctions with Parramatta Road will get worse with WestConnex than without.*** This is due to the combined effects of induced traffic and drivers using Parramatta Road to avoid tolls on WestConnex.

## **2.12 WestConnex is an aesthetic disaster for the inner west**

The ramps and portals to and from the M4 East tunnel in Wattle Street and Parramatta Road create great concrete gashes in local landscape, completely out of scale and character with suburban environment of Ashfield and Haberfield.

Prettying up concrete walls with dolphins, or whatever is the latest gimmickry does not change this. Nor does sticking in any number of mature trees, and showing little green areas between roads; these areas cannot be used and will inevitably be poorly tended and accumulate rubbish.

The ventilation stack at the junction of Wattle Street and Parramatta Road is massive and will dominate the elegant and heritage listed clock tower on Bunnings opposite, and the skyline for a considerable distance. What were peoples' homes on the western edge of Haberfield have been turned into a large industrial compound

The downright disdain the Sydney Motorway Corporation has for the physical environment is shown by the fact that the EIS contains no three dimensional models of the surface works associated with WestConnex. Physical project models and computer assisted walk throughs should be mandatory to give people an idea of what it will look like 'Concept only' artists' impressions are just not adequate.

***The EIS should be rejected on the basis that it inadequately describes the three dimensional nature of the project.***

## **2.13 Who pays for and who benefits from WestConnex?**

In response to people losing their homes to WestConnex Premier Baird said that a few people have to make sacrifices for the benefit of many.

So, who is paying for and who is benefiting from WestConnex?

People losing their homes is at the extreme end of sacrifice, which is made worse by inadequate compensation to enable them to buy back into the same area. At a personal level this means people uprooted from their communities and social networks, including children having to change schools and losing their friends. At a policy level it means the loss of housing stock in accessible locations, mostly houses for families which are not being replaced. And there are hundreds of homes being lost and blighted, wherever WestConnex stretches its tentacles. We know about M4 East afflicted Concord and Haberfield/Ashfield. We will soon know about the impact of Stage 2 on St Peters and Newtown. And Stage 3 will inevitably result in more homes being lost along its route.

But we are all paying financially for the folly of WestConnex through our taxes

Also through tolls paid by users. And WestConnex is not only to be paid for by its own tolls, but also by raising tolls on other roads ('Disappointed NRMA hits out at toll 'cross-subsidy' proposal, SMH, 8 April 2014). Tolls have already been reimposed on the M4. A leaked financing strategy by Macquarie Capital revealed the extent of imposing new tolls on the M5 ('Revealed: M5 tolls to stay 50 years', SMH, 7 April 2014). Road users throughout Sydney will be paying for this one road.

We are also paying through not receiving other services, including public transport, that \$15.4bn being spent on WestConnex would otherwise purchase.

The people of Western Sydney have been completely misled on the benefits to them of WestConnex. How many really want to drive to the CBD or to the airport? The fact is that 90% of trips to the CBD are by public transport, and parking in the CBD is limited and very expensive. As for driving to the airport, it will still be quicker, and cheaper, to catch a train from Parramatta than to drive, even after WestConnex is built.

Instead, what the people of Western Sydney need is better transport access within Western Sydney, which is the major location of growth within Sydney.

So, who is benefiting?

The Minister for Roads benefits due a substantial increase in the size of his portfolio. And the roads bureaucracy benefits from the continuing stream of work that WestConnex and the inevitable downstream road projects it will engender.

The trucking industry? The improved movement of freight to and from Port Botany is often given as a benefit of WestConnex. But WestConnex does not go near and is not connected to Port Botany, and it surely would if this were its major purpose.

Improved access by car to Sydney Airport is often given as a rationale for WestConnex, and this is the truth of the matter. The privately owned Sydney Airport collects a lot of revenue from parking, and has lobbied for years for improved road access. But this is scarcely an argument for the expenditure of large amounts of public funds on WestConnex, with the Airport already having good rail access.

The corporations building WestConnex, and the numerous consultants involved in designing and justifying it, and the eventual private operator of the tollway will benefit from WestConnex. So will the banks and financial institutions if it attracts private capital.

Michael West, with another of his succinct and incisive analyses has explained how professionals get rich on the fees from road projects, and that fees for roads are far more lucrative than rail ('Bankers and lawyers get rich pushing roads', SMH, 2-3 August 2014). As he says "the real winners from the road deals are bankers, lawyers, accountants and assorted professionals who so indispensably provide their advice". West refers to them as "the road pushers".

In summary then, the government's friends in the big end of town are the major beneficiaries, set to make a motza out of public purse in designing, building and operating WestConnex, with all the risk lying with taxpayers.

***Quite the reverse of the Premier's assertion, then, the many are paying for the benefit of the few.***

### **3. Alternatives to WestConnex**

I have been following the press on WestConnex. Apart from people who benefit from or are fearful of criticising the government lest they lose business, and the politically partisan Murdoch press, what I have found is universal criticism and condemnation by transport experts and commentators. I have mentioned a number of examples throughout this submission. Consistent is that the future of cities like Sydney lies with public transport, not more roads.

A typical recent example is 'We need to build the cities of the 21<sup>st</sup> century, not the roads ...' by Professor Peter Newman, AO, John Curtin Distinguished Professor of Sustainability at Curtin University (p7, EcoTransit News, October 2015). Prof Newman was also on the Board of Infrastructure Australia for four years. He argues that WestConnex should be stopped and that the \$15bn that was to be spent on it be redirected into improving public transport for, and walkability of Sydney.

The government, however, has never systematically considered alternatives to building WestConnex. Or at least as far as we know. All we have is some vague analysis that concludes that WestConnex is the best or only option.

Any business case for a major infrastructure project should contain a thorough analysis of a wide range of options. We do not know if that was done, or even if there is such a business case, as the government has refused to release one (see my point 1 – the Executive Summary of September 2013 is not an evidence based business case). Instead, led by Tony Abbot, the NSW Government had decided it wants to build WestConnex, Australia's most expensive road, which will suck in funds that could be used for other infrastructure.

***The WestConnex business case should be included as part of the EIS, so that both can be considered together.***

### **4. Alternative design for M4 East**

I first heard of WestConnex at a public meeting in Ashfield Town Hall in December 2013. It is fair to say that the design presented sparked outrage in the local people present.

Comments from the floor pointed out how ridiculous it was to disgorge extra traffic from the M4 East tunnel into the already most congested part of Parramatta Road to the east of Liverpool Road, and in onto the already congested Dobroyd Parade/City West Link. One idea that was suggested was to exit the M4 East tunnel close to the Victoria Road/ANZAC Bridge, that is the 'long tunnel option'. This was common sense based on the knowledge of local people.

The government however decided that it was not going to consult further on the design of WestConnex, instead pressing on with its own preferred design in secrecy and contrary to due process (my point 1). The result is the mass destruction wrought on Ashfield LGA, particularly the heritage suburb of Haberfield, as presented in the EIS.

This would be ameliorated by adopting the long tunnel option. Ironically, the Minister for Roads changed the route of Stage 3, from following the alignment of Parramatta Road, to a route going north east from Haberfield to the ANZAC Bridge and then south east to Camperdown. The first leg of this route aligns totally with the long tunnel option. And it makes no sense to discharge traffic onto Dobroyd Avenue and then duplicate this route with Stage 3.

As for the long tunnel option being more expensive, all that is involved is in fact a shifting of cost from Stage 3 to Stage 1. I doubt that the total cost will be any different. And the long tunnel option has the advantage of connecting WestConnex Stage 1 directly to Victoria Road and the ANZAC Bridge without relying on the unfunded Stage 3, which could be significantly delayed or not built at all. It would also increase the attractiveness of Stage 1 as a toll road, increasing its value if the government sells the rights for toll revenue to the private sector.

***The government should delay the construction of the M4 East to consider the 'long tunnel option'.***

## **5. Support for submission by Ashfield Council**

Ashfield LGA will bear the full brunt of the WestConnex M4 East tunnel, and the effects will be devastating on the local communities, for a project that is of very dubious merit. The impacts will be bad, and if Stage 3 is delayed or not built at all, they will be worse.

Ashfield Council represent the people of Ashfield LGA, and the Council and its officers know every part of the area intimately. This gives special credibility to the Council's response to the EIS. This includes not only input from Council officers, but also input from consultants with specialist expertise.

***I have read Ashfield Council's response to the EIS, support its recommendations, and would like their response to be considered as an annexure to my submission.***



## **6. Ameliorating the local effects of WestConnex M4 East as proposed**

Although WestConnex is an unmitigated disaster for which, based on rational analysis planning permission should be refused, I recognise this is unlikely. Not least because of a massive conflict of interest where the Minister for Planning is adjudicating on a project promoted by the government of which he is a part.

I have therefore to consider how, if built, its impacts can be ameliorated.

### **6.1 Reduce capacity of Parramatta Road**

***If WestConnex is built, the capacity of Parramatta Road should be reduced to no more than two traffic lanes in each direction, and the speed limit reduced.***

This is to:

- reduce induced traffic and encourage mode shift to public transport
- improve the environment of Parramatta, oft quoted by the government as a benefit of WestConnex, a benefit that will not be achieved without reducing road capacity and traffic speeds
- allow traffic to operate safely within the existing lane widths (they are very narrow, and a bus and truck can barely pass each other in parts)

### **6.2 Close off Chandos Street, Ashfield, where it meets Parramatta Road**

I live in Chandos Street, Ashfield, so have a particular interest in this area.

According to the EIS, at this point the present Parramatta Road increases from six to 10 lanes, and overall width from 20m to 60m. This is all achieved on the southern, Ashfield, side of Parramatta Road.

This brings the widened road close to flats on the northern side of Loftus Street, and properties at the end of Chandos Street. It will be necessary to install a sound barrier along this section of Parramatta Road. This sound barrier will however be punctured by Chandos Street connecting with Parramatta Road, and any sound barrier needs to be continuous to be effective.

It is left turn into and out of Chandos Street only, and the junction takes little traffic. Furthermore it is too far west for traffic to access the westbound portal to the WestConnex tunnel (traffic has to go further east to Orpington Street to achieve this).

***Chandos Street, Ashfield should be closed of where it meets Parramatta Road, so that a continuous sound barrier and screening trees planted continuously between Orpington and Bland Streets.***

### 6.3 Connection of north and south sides of Parramatta Road

Parramatta Road divides Ashfield from Haberfield. Currently the light controlled crossings are widely spaced, being at Wattle, Bland and Dalhousie Streets and Liverpool Road. Because of this wide spacing, people cross Parramatta Road 'informally' at intermediate points.

The radical increase in width of Parramatta Road between Bland and Orpington Streets will however prevent this, and increase the divide between the two suburbs.

I therefore support Ashfield Council's proposal for **a combined pedestrian/bicycle subway or bridge crossing Parramatta Road from Chandos Street**, which is about half way between Bland and Dalhousie Streets. This would fit neatly with my proposal to close off Chandos Street from Parramatta Road, reconnecting the southern (Ashfield) and northern (Haberfield) parts of Chandos Street.

### 6.4 Restrict Orpington Street access to Parramatta Road

***I support Ashfield Council's proposal to restrict access from Orpington Street to westbound Parramatta Road only ie not to the westbound portal of WestConnex.***

I agree that turning left from Orpington and crossing lanes to the tunnel portal would be an extreme traffic hazard.

But it also goes the heart of the relationship between local, residential streets to major roads. The argument for urban arterial roads is that take traffic off local roads, which means that one can have habitable residential areas close to, but separate from arterial roads taking high volumes of traffic. But this takes active management. Traffic is like water, if blocked in one channel it will find another, and WestConnex will introduce/induce extra traffic into the Ashfield LGA.

Increasing the volume of traffic in Orpington Street would also create a barrier for people to the west accessing Ashfield Park. These often include parents with young children,

***To protect the residential Orpington and Ormond Streets from additional through traffic, the nearest point east to access the westbound portal to WestConnex should be Liverpool Road.***

### 6.5 Screening Ashfield Park from Parramatta Road

There is an opportunity to screen Ashfield Park from Parramatta Road, reducing visual intrusion and traffic noise.

**Consideration should be given, in consultation with Ashfield Council, to a grassed earth bank topped by a thick barrier of shrubs being installed along the northern boundary of the Park to provide separation from Parramatta Road**

## Concluding Comments

I oppose WestConnex, full stop. The resources put into WestConnex, and conceptual thinking underpinning it, will set back transport planning and urban planning more generally in Sydney for a decade.

WestConnex is not the magic fix to Sydney's traffic congestion. Instead, the induced traffic it will create and spreading of traffic congestion onto surface roads already at capacity will create demands for an unending demand for road 'improvements'.

It is time to change the paradigm and stop this madness. The M4 Widening is comparatively simple and cheap, and could even be reversed. But the M4 East as conceived is the tipping point. If it is built, there is no going back. We will be propelled towards completing WestConnex and road projects into the future to address the congestion problems WestConnex will create.

I believe I have presented enough arguments in this submission for planning approval based on the EIS to be refused.

Alternatively, Planning could indicate that the preferred option for Stage 1 is the 'long tunnel' option extending the tunnel to the ANZAC Bridge. Assessment of the M4 East EIS should conclude with a request for the government to re-consider the long tunnel option and ask that the Sydney Motorway Corporation submit an EIS for this option for assessment.

In the worst case scenario, where the WestConnex EIS as presented is approved, this approval should include the conditions contained in this and Ashfield Council submissions, to ameliorate the worst impacts of WestConnex on the Ashfield LGA.

***I request an individual written response to all points I have made in my submission.  
Thank you.***

John Hyde  
1 November 2015