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## SSI 6307 NSW Department of Planning and Environment GPO Box 39 Sydney NSW 2001

Dear Sir/Madam

## RE: NSW WestConnex M4 East EIS

Thank you for providing the opportunity to respond to the M4 East Environmental Impact Statement and the now detailed plans for the project. The response is on behalf of my entire family: wife Natalie, and daughters Sia (3) and Aubree (1).

Our home which we own is located at 29 Dalhousie Street Haberfield which is opposite houses on the limit of many of the studies. We are approximately 130 meters from the corner with Parramatta Road (where McDonalds is located).

My wife and I are not opposed to motorways, toll roads, cars, construction work or progress in general. We own two vehicles used for commuting to work invariably using Parramatta Road and the City-West Link between Haberfield and the city. We often make use of the M5 and M2 to visit our extended families. We occasionally use the M4. We appreciate the frustrating traffic congestion that exists between Wattle Street and the M4, as well as congestion in general in the Inner West.

Prior to reading the EIS our main concerns about the project were:

- Air quality in the Haberfield area close to the ventilation tower and portals
- Traffic congestion from larger numbers of vehicles expected to make use Parramatta Road and the City-West Link eastbound in the morning peak upon the project completion
  - The air quality impact of greater congestion, slow moving traffic, especially trucks exiting the tunnel on a rising gradient at slow speed and with frequent stopping
- The greater accessibility provided by the M4 East likely to create the congestion effect currently experienced
  - o on Parramatta Road near the M4 start/end at Concord
  - o on the length of the M5 East
  - The unknown duration of operation before the M4-M5 Link is completed
    - There are a number of concerns with this subsequent project, however they relate more to treatment of Parramatta Road following its completion
- The effect of the above on the amenity and value of our home
- Our likelihood of sending our children to Haberfield Public School (currently our closest)
- The connectedness of the communities of Haberfield and Ashfield as we regularly take our children to Ashfield Park and enjoy the culture of Ashfield and Summer Hill
- The overall benefit of the project to the community
- The effect the project has on other residents in the area, in particular those losing their homes or those bordering dwellings to be demolished
- The level of consideration to alternatives, namely
  - Developing the M4 East from Concord to Rozelle as one project

- o Intermodal freight transport
- o "Fast" direct-to-city trains from key stations with large car parks

The EIS addresses most of the above concerns with lots of detail in some areas and very little detail in others.

In the general order of the EIS document chapters, I raise the following issues found and seek a response from the Department or planners:

- Section 1.4 mentions that the project addresses the high-level of public transport using Parramatta Road and surrounds. This does not appear to be a major benefit compared to the number of bus routes east of the project, there are only two using Parramatta Road in the area of the project. There is a likely negative effect of congestion affecting those many routes turning from Norton Street into Parramatta Road in the morning peak.
- 2. This section also indicates that north-south movement across Parramatta Road will be improved in the area of the project. As experienced on South Dowling Street, the M1 completion did not improve the level of cross-flow traffic particularly at Cleveland St and Lachlan St/Dacey Ave. This is simply not possible unless you can convince motorists to use the tunnel and pay the toll. The Cross-City Tunnel is another case-in-point where motorists continue to use Bathurst St, Park St, Druitt St thus creating delays for motorists on Pitt St, Castlereagh St and Elizabeth St. The level of traffic to remain on those roads will result in traffic signals to remain with similar phasing delays to cross-flow traffic.
- 3. Section 3.2 states congestion as the main rationale for the project, however it fails to describe how this will be achieved. That is, there currently exists congestion at the eastern end of the motorway. Following the project there is nothing in the EIS to say there will not be congestion at the eastern end of the extended motorway. This will be worse than the M2/Lane Cove Tunnel, M1 or M5 as all of those roads feed other motorways. The Rozelle extension (to Anzac Bridge) is vital to address this issue.
- 4. Similarly the Summary at Section 3.4 completely ignores the congestion expected at the eastern portals.
- 5. It is unclear how the modelling described in Section 4.2.1 of the 'Do-Nothing/Do-Minimum' base case works. Presumably it makes the assumption of there being no other improvements in Sydney's transport infrastructure, that is, no 'fast' direct trains with large car parking infrastructure, or no use intermodal freight facilities. In the absence of an M4 East, this is unlikely. The modelling is therefore of questionable relevance.
- 6. Section 4.2.3 is not backed by any supporting evidence. There is no analysis of data or surveying of current M4 users. Such analysis is not difficult to do technically. Data regarding people's journeys could be anonymously sourced from Apple and Google on request. Similarly Opal users could be anonymously analysed. Only then could this conclusion be reached. Better dispersion of people through a well-connected public transport system is key to its success.
- 7. The same section reveals that the EIS is inherently unbalanced and the NSW Government is politically motivated to ensure the alternatives are not given due reasoning. This may be the current government's position but this should not be reflected in an EIS. It discredits the EIS authors and contributors and makes a mockery of the EIS as a truly representative analysis

of the problem and the options to fix them. On the other hand, it is appreciated the EIS has limited scope and its authors have limited terms of reference.

- 8. This sections also assumes that if the share of container freight is doubled, presumably from current levels, there will still be a 70% share this freight on the road. This figure is meaningless as the level of container freight on rail will increase dramatically once intermodals are operational. It would appear this project is competing with the intermodal project, which brings into question the coordination of the government relating to transport.
- 9. In Section 4.2.4 covering Demand Management does not consider the introduction of a congestion charge similar to that used in other capital cities e.g. London. Nor does it consider better Park & Ride facilities, encouragement of ride sharing (pooling) and time of day tolling.
- 10. In Table 4.7 options for the tunnel exit are described. While the selected exit onto Parramatta Road has advantages, it is still at the top of the local terrain and therefore requires vehicles to burn greater fuel to rise and emerge. It is odd the option of tunnel portals immediately east of the Hume Hwy wasn't considered.
- 11. Given the portal positions, it is vital to establish strict pollution controls including CCTV and computer software to assist the tracking of polluting vehicles. There is a school very close to the dive ramps and heavy congestion will degrade air quality, especially if smoky trucks are not curtailed.
- 12. Within Section 4.5.2 the eastern ventilation facility is described as being designed for the M4-M5 Link. It does not appear that this EIS considers the overall scheme air quality impact i.e. the emission levels likely from the M4-M5 Link as well as the M4 East. Similarly, it is unclear how the ventilation will work with the tunnels joined, given the preference to extract air near the tunnel exits.
- 13. The same section concludes the location chosen provides the best air quality outcome however this isn't supported by the information provided. There is a real concern that this facility will adversely affect Haberfield Public School during still air weather conditions. It is noted the boundary of the ventilation facility is just 275m from the school. A more ideal location would appear to be 300 to 600m west of the chosen location.
- 14. Section 5.5.4 describes the merging required on Wattle St to enter the tunnel. Given the somewhat unexplained inability of Australian car drivers to merge, this would create congestion. Similarly, the design appears to split traffic into two lanes before merging again to one before joining the mainline tunnel. It would be worth observing how well drivers merge on approaches to the Harbour Bridge, and recalling experiences on the Sydney-Newcastle Freeway before it was made 3 lanes for the full length between Waroongha and the Gosford Exit.
- 15. Also, it isn't clear why a right-turn is required for exiting traffic into Warratah St. Those wishing to arrive in Haberfield from the tunnel should use the Parramatta Road exit. This right-turn bay will provide an easy option for those wishing to rat-run to the city along Marion St. It will increase traffic outside Dobroyd Pt Public School. It seems odd the tunnel exits were not within Reg Coady Reserve and therefore left of the existing Wattle St traffic and avoiding the right-turn bay. The reserve is a relatively unused space (however flooding may be a concern).

16. The Tables 8.9 to 8.12 show Levels of Service summarised in the Histogram chart be low for the number of locations, times (AM/PM) and directions (EB/WB) for each LoS. The project seems to offer only a small number of improvements to surface roads based on the modelling. It is therefore difficult to argue significant improvements to surface conditions will result.



- 17. This provides another reason to apply time of day tolling to surface roads. If such tolling were to be introduced, it would be far wiser to introduce this prior to the project and assess the improvement to peak conditions. (This could be similarly applied to the M5 East) Tolling surface roads where journeys continue beyond the edges of the project would provide additional funding for the project.
- 18. It is also important to understand the price -elasticity of tolled roads. There appears to be no study conducted. It is vital this is understood to avoid congestion or under-utilisation on either surface roads or motorway tunnels. There is strong evidence to support cross -city traffic tolling to encourage motorists to use the CCT. Similarly, this should be investigated for the M4 East.
- 19. There appears to be no study of expected travel times under the DS scenario that compare the toll-free option of Parramatta Road versus the tolled M4 East tunnel. If the toll is high and the saving is low, many will avoid the road, as is the case with the CCT. This is another argument for surface road tolls for transit (passing through both Concord and Haberfield) traffic.
- 20. Surface road tolls could also fund pinch-point improvement projects. Intersections at Hume Hwy, West St, Norton St and Crystal St would benefit greatly from such projects if underpasses were constructed. Underpasses for right-turning traffic would be a major benefit as is the case with Pennant Hills Rd at Castle Hill Rd.
- 21. Without tolls on both routes, morning peak congestion around the portals and merging lanes onto both Parramatta Rd and Wattle St will be heavy and traffic will back up on both the surface roads and within the tunnel. The M4 East is highly likely to resemble the present M5 East in morning peak without adequate tolls.

- 22. Section 9 on Air Quality is important to this reader and provides a number of interesting facts not previously known regarding background air pollution, and what constitutes poor air quality. However, it was disconcerting to read the following sentence under 9.4.1 given my previous comments on traffic and congestion, and given we live at the eastern end of the project: *"The notion of uniformly slow moving traffic throughout a tunnelin the absence of an accident or other incident is unrealistic."* This is highly unbelievable given the current experience with the M4 at Concord and of the M5 East in the morning peak. However, it may be true that congestion at that time of day and the pollution emanating from that congestion that concerns residents near Parramatta Rd and Wattle St. This pollution is put into the air in this area at the time of day when children beginning their school day just 275m from the ventilation stack, and even less distance from the ramp following the tunnel exit on Parramatta Rd. This congestion and pollution is the key concern and it must be controlled.
- 23. There is an error in Figure 9.22 on page 9-48. Is it micrograms or milligram per cubic meter?
- 24. Regarding Noise and Table 10.17, it would appear that noise levels at Haberfield Public School are already high and that construction will create levels that present simply too great a risk of affecting the learning achieved by children. It is strange the classroom noise penetration is not assessed. A school this close to the construction and operation of the motorway will most likely require abatement measures. It should be remembered this school is already subject to air traffic departing on Sydney's main north-south runway to the north a large portion of this air traffic banks left passing over Haberfield during airport peak times at time with winds coming from the north. Measurements of this air traffic noise are available from the Airservices Australia. Abatement measures should be similar to those used under the flight path in the area of Marrickville and Stanmore during the late 1990s, and includes roof acoustic insulation, double-glazing (and therefore also air conditioning). I am not aware of current abatement levels in place at this school but strongly suggest they are reviewed.
- 25. In Section 11.7, there is no evidence within the EIS or from friends with properties being acquired, that the NSW Government is minimising the impact to those forced to move. There is no support for a local relocation, no property finding services, no payment for time consumed in the overall process of searching and subsequently moving. There is substantial effort and stress involved and the people of NSW would reasonably expect those making way for the project should be no worse off. They should be assisted with no expense spared. There should only be upside for them and their move. This is clearly not the case and it is shameful.
- 26. Similarly, those living adjacent to construction or the completed project once the Enterprise Corridor is removed i.e. the barrier between residences and Parramatta Rd currently as shown on Figure 12.4, should be adequately compensated for the loss of property value. It is not difficult to assess the impact as there is already historical data showing the difference in value of properties already bordering major roads and those separated by one property.
- 27. The EIS also does not cover adequately or at all a number of other issues. The appears to be little or no analysis of the traffic increases likely through side streets in the vicinity of the tunnel exits, and in particular traffic likely to make its way through Dalhousie St, St Davids Rd or Warratah St onto Ramsay Rd and Marion St.

- 28. Mention of further restricting the right-turn bay from Parramatta Rd to Liverpool Rd will severely affect community connectivity between Haberfield and Ashfield. In addition, the point where Dalhousie St meets Parramatta Road is a busy thoroughfare for foot traffic connecting the two communities, particularly popular with families. There is already a concern about crossing here with children but with increased traffic exiting the portal onto Parramatta Rd, which may still be travelling at the tunnel speed of 80km per hour, it is a significant safety hazard. Funding needs to be allocated to build a foot bridge so not to compromise community connectivity and for public safety.
- 29. The total number of vehicles producing CO, NOx and PM able to use Sydney's roads will increase as a result of the project, as the intention of the project is to increase capacity. The EIS does not reference any other programmes or initiatives to reduce the number of or severity of polluting vehicles. There is no mention of incentives for zero emissions vehicles, such as discounted or zero tolling, or by making public transport more usable.
- 30. In Volume 2D on Health, page 71 describes PM<sub>2.5</sub> already at levels that often exceed the guidelines on a 24-hour basis. The EIS does not describe what measures the government are putting in place to tackle this issue. Smoky cars and trucks should be targeted by tunnel video surveillance and computer software for automation. Such vehicle owners should be issued with defect notices where they are confirmed as repeat offenders. Such cameras should be placed on rising gradients near tunnel exits.
- 31. In Volume 2E regarding Social Impact, on page 162 the issue of cycling is raised. This does not appear to be addressed anywhere in the EIS. It is crucial the project has a similar outcome to the LCT where a cycleway is constructed either on Parramatta Rd or Queens Rd (and other roads on that route).
- 32. Finally, in Volume 2F, water analyses on page 425 and after have numbers in some columns removed or hidden. This does not appear to be explained.

We appreciate substantial effort has been invested in preparing the EIS. We hope due consideration is given to the above feedback and issues we raise.

Sincerely

Paul Rupil