



Alexandria Residents' Action Group

28 January 2016

SSI 6788

NSW Department of Planning and Environment

GPO Box 39

Sydney NSW 2001

This submission is made on behalf of the residents of Alexandria under the auspices of the Alexandria Residents' Action Group (ARAG) in response to the requests for submissions in response to the Environmental Impact Statement (EIS) for the westCONnex M5 extension.

ARAG expects our submission to be published in full, acknowledged by the Department of Planning and ARAG expects a credible, fact-based response to the concerns and issues raised.

Before we respond to the EIS specifically, ARAG would like to make the following comments:

1. We believe that the process followed by the NSW Government, the NSW Planning Department, the Premier Mike Baird, the Treasurer Gladys Berejiklian, the Roads Minister Duncan Gay and the Planning Minister Rob Stokes in relation to westCONnex is the most appalling example of dishonesty – lacking in all aspects of transparency, accountability, governance – and yet, the government seems determined to proceed at all costs, and against all credible advice not to proceed.

Giving councils, individuals, experts and residents such a short time to respond to the many thousands of pages in the EIS – and doing it over the Christmas New Year period – smacks of a Government that cares little for the people it is supposed to serve.

2. ARAG believes that westCONnex is not the solution to the problem of congestion in Sydney; rather it will be a humungous contributor. On no measure, can the project be allowed to proceed.
3. The cost benefits of the Project in all aspects are a joke – one being played on the NSW Taxpayer with no regard to the future burden when the taxpayer is asked to bail out, as we have on many occasions, various private operators who can't make a buck because the returns don't match the overly-optimistic traffic projections.

There is a well-known definition of "stupid": that is, repeating the same mistakes, but expecting better outcomes.

4. ARAG notes that the government is looking to spend \$16.8 Billion (and climbing) on a polluting 33 km roadway that will be used by less than 1% of the population. This is an affront to the people of NSW who will be denied funding for hospital beds, public transport, and schools for their children, or safe roads in rural areas.

5. We believe the project's processes to be deeply corrupted. There are numerous examples, but none so obvious as using firms like AECOM to write an 'independent' EIS, when they themselves are also being awarded, or are positioning themselves to be in the running to be awarded, millions of dollars in design and construction contracts and other consulting work. This same firm has already had fines exceeding \$200 million and counting levied against it for their shoddy work in relation to the Rivercity road projects in Brisbane.

We have been advised by experts that the M5 EIS is one of the worst that they have ever seen. Despite its bulk, it is an appalling effort and an affront to the intelligence of the taxpayers of NSW. It is a classic example of quantity over quality.

6. At no point does the NSW Government compare the proposition of a 33 km polluting toll road to any other solution to Sydney's problems of congestion and the need to handle the growth we face in the next 50 years.

Alternatives as proposed by Eco Transit and others are not even considered, an approach that is fiscally irresponsible. Eco Transit has proposed the following:

- Buying back the Airport Link and reducing the cost to commuters (estimated cost \$250 million);
- Providing a link between Sydenham Station to the University of NSW and the Randwick Health Precinct via the Airport Line with connections to the Southern Industrial Complex (estimated cost \$450 million);
- Adding a rail station to the Airport Line at Doody Street (estimated cost \$75 million), and
- Developing a Kingsgrove Last Chance Park and Ride, Kiss and Ride and Bus Turnback area which will allow people to access the Airport Link and massively reduce the number of cars needing to travel on the M5 (estimated cost \$70 million).

These proposals total just \$845 million. A far cry from the billions that the M5 extension is estimated to cost (and climbing). Individually and collectively they provide a better solution than the proposed M5 toll road.

7. ARAG objects to the government's cynical act of transferring responsibility for this project from the Roads and Maritime Services, a government department to the westCONnex Delivery Authority, a Statutory Authority and now to Sydney Motorway Corporation Pty Ltd a private corporation, in a base and cynical act to hide the project from scrutiny by the Parliament, and hence the taxpayers of NSW.

Why has this been done? What is the government trying to hide? Where does the liability fall for future failures, cost blowouts, project risks and other hazards?

Why is it that the board of the private company comprises appointees only with expertise covering financial, procurement and contracting but has no appointee representing the interests of those using, or impacted by this project?

8. The updated strategic business case dated November 2015 attempts to justify this outrageous westCONnex project.

It is the responsibility of government, as the proponent of a project, to prepare the

strategic business case.

Clearly, this business case was prepared by consultants who have vested interests in the outcome.

When originally posted online, there was no attribution to this document. There was no branding for the RMS; there was no branding for the westCONnex Delivery Authority; there was no branding for the Sydney Motorway Corporation – the sham company established by the government so as to avoid scrutiny of this project by the NSW Parliament; there was no branding for the NSW government. The “NSW – Making it Happen” logo has no attribution and could have been downloaded by anyone from anywhere on the internet.

That original document was quickly taken offline and “replaced”. The “new” document still contains no attribution.

The document states, but only on the back cover, that it is publication number RMS 15.600, but that just acknowledges the fact that the document has to “live” somewhere.

Companies such as AECOM have been involved since the beginning of the westCONnex project and have actively sought to position their businesses for lucrative follow-on design and construction contracts.

That consultants would be paid to assume the government's responsibility for preparing a business case is a blatant and outrageous conflict of interest and makes a sham of proper governance and open and transparent evidence-based government decision-making.

We call on the Auditors-General, at both State and Federal levels of government, to conduct an independent and complete audit of the westCONnex project.

A business case is an important document that should reflect the true costs and purported benefits of the project. It is government's responsibility to deliver such a document; it is not the role of business to deliver such a document.

That large sections of financial information have been redacted from the business case clearly shows that government is not committed to an open and transparent public assessment of the business case.

The updated strategic business case contains significantly redacted information in Chapter 13 that is designed to hide the true costs and purported benefits of this project.

Chapter 13 confirms that the original projected cost of \$10 billion has already blown out to \$16.812 billion without any measurable progress on the project whatsoever.

What this implies is that, even with a current cost blowout of an incredible 68% before the project has achieved ANY milestones, the business case argues that the cost-benefit ratio is still better than \$1 – that is, a beneficial return of more than \$1 for every \$1 spent.

To assume that the original business case could accommodate a cost blowout of over 68% and still be viable stretches credibility beyond any reasonable assessment.

To assume that the current business case can accommodate the inevitable future cost

blowouts and still maintain a positive benefit to the State is absurd beyond belief.

Further, Chapter 13 hides the true value of tolling revenues that would be collected by private toll operators.

Residents of New South Wales deserve to be told how much they are expected to pay to use this infrastructure.

It is unacceptable that such information should be cloaked by "commercial in confidence" or "intellectual property" caveats. Information such as tolling revenues is information that is vital to a fair and reasonable assessment of the business case and therefore the viability of the project. As such, it must not be hidden from public scrutiny, especially since tolls are now to be applied, for a period of 43 years, to roads that the residents of New South Wales have already paid for.

Who agreed to a tolling period of 43 years, and what deals were done with business to secure such an outrageous agreement? Who were the parties to this agreement and with whose authority were they acting?

Chapter 13 also completely hides information related to the recurrent costs of operating this infrastructure.

Construction is only the first phase of a project. During its lifetime, the recurrent costs of maintenance such as repairs, resurfacing, ventilation systems and signalling systems add significant cost. That such information remains hidden in this business case is further evidence that the government is not committed to an open and transparent assessment of the costs and benefits associated with westCONnex.

How much public money is the government prepared to waste on this project given that costs will continue to escalate and there is no known final price for this project?

The business case now refers to an 'Enhanced westCONnex'. This is a tawdry attempt to slap lipstick on a pig.

Politicians remain committed to this project despite the overwhelming evidence that it is a disastrous waste of money; a project that fails to deliver the basic objective of connecting to the port and to the airport; a project that unfairly compensates residents for the loss of their homes and businesses; a project that destroys communities; a project that destroys flora and fauna habitats; a project for which the final cost to the taxpayers is unknown.

Is \$16.8 billion and rising the cost of politicians not having to acknowledge their lack of accountability, transparency, probity and proper governance, let alone the failure to properly articulate the problem that needs to be solved and exploring viable, cost effective alternatives? Is \$16.8 billion and rising the cost of politicians clinging to their flawed and out-dated ideologies?

Is \$16.8 billion and rising the cost of politicians not acknowledging that, oops, they got it wrong, and need to rethink their approach?

Is \$16.8 billion and rising the largest ever transfer of public monies to the private sector?

Feedback on the M5 Environmental Impact Statement

Failure to meet any of the stated objectives

The stated objectives of the New M5 project, which are similar to the stated objectives of the overarching westCONnex project, are as follows:

1. Support Sydney's long-term economic growth through improved motorway access and connections linking Sydney's international gateways and south-western Sydney and places of business across the city
2. Relieve road congestion to improve the speed, reliability and safety of travel in the M5 Motorway corridor
3. Cater for the diverse travel demands along these corridors that are best met by road infrastructure (ARAG argues that road is not the only viable option)
4. Enhance the productivity of commercial and freight generating land uses strategically located near transport infrastructure
5. Fit within the financial capacity of the State and Federal governments, in partnership with the private sector
6. Optimise user pays contributions to support funding in an affordable and equitable way
7. Provide for integration with other westCONnex projects and the proposed Southern extension, while not significantly impacting on the surrounding environment in the interim period
8. Protect natural and cultural resources and enhance the environment

Supporting economic growth

Sydney traffic is congested. If westCONnex proceeds as proposed, congestion will get worse for most drivers, who are not prepared to pay the tolls required to use the M5 and the New M5.

Furthermore, the EIS recognises only Sydney's two current international gateways, and does not consider Badgery's Creek airport, which, when completed, will be a significant third international gateway to Sydney. Given the operating constraints on Kingsford Smith, Badgery's Creek may one day be the prime international gateway to Sydney. Consultation on the merits of the westCONnex project is incomplete until it considers how best to serve the many travellers and workers who will need to commute to it.

Despite the claimed importance of Kingsford Smith and Port Botany, the planned route for the westCONnex does not connect to Sydney Airport or Port Botany. The road turns north and away from the airport, to dump tens of thousand of cars per day into congested inner-city streets around St Peters, Newtown, Alexandria, etc.

Ultimately, the EIS does not provide evidence it will assist economic growth, or even if economic growth can be assisted by improved motorway access – not when it comes at such a cost to the tax payer.

Addressing congestion

There should be concern about congestion in roads beyond the portals causing traffic to slow, including in the tunnels. Local improvements cannot be relied on to address this because of induced traffic, because of growth in local population, and because the local roads are already bottlenecked well beyond the scope of the analysis performed for this EIS. Simply stated, the consultants have NOT modelled traffic flows beyond one or two intersections outside the project area.

Claims by westCONnex that the project will improve speed and reliability depend on the reliability of its approach to traffic modelling - an approach that contemporary experts argue is flawed.

Without congestion charging, or similar, the laws of induced traffic mean that increasing road capacity only increases traffic volumes; it does not reduce congestion. Charging for the M5 without congestion charging on alternate routes will increase, not reduce, congestion on those routes.

The improvements in congestion claimed for the project arise from measures that can be separated from the construction components of the project – the reintroduction of charges for using the road.

Catering for diverse travel demands

This objective requires an assessment of which of the many travel demands along the corridor are best met by road infrastructure. This assessment is not present in the EIS. Instead, the EIS assumes, rather than demonstrates, that a range of diverse travel needs are 'best met by road infrastructure.'

The majority of traffic movements are highly responsive to environmental changes including: provision of alternate modes of transport, (for example public transport); provision of alternate traffic generators (for example increased local employment opportunities); and cost and other signals (for example congestion charging).

Providing such alternatives and incentives would free up road infrastructure for use by those road users that genuinely have no alternative, and it would do so at a lower cost than the New M5.

The New M5 fails to meet this objective.

Enhancing the productivity of commercial and freight generating land uses strategically located near transport infrastructure

While the EIS does not make clear exactly what lands this is referring to, the planned route for westCONnex does not connect to Sydney Airport, Port Botany or the Badgery's Creek Airport which could all be considered to be 'commercial and freight generating land uses strategically located near transport infrastructure'.

It could be a reference to faster travel times that would enhance productivity and attractiveness for businesses along the westCONnex route, but only if traffic modelling predictions are accurate.

Press leaflets delivered to our homes by the WDA tout a 46% decrease in travel times on the M5 – but read the associated asterisk and you find this figure is only to King Georges Road. Beyond that, the M5 will remain a carpark.

The EIS states an improvement in travel speeds of just 1 km/h. One! How can that be worth \$16.8 billion and rising?

The modelling has not been made available for independent review and as highlighted above, modelling by the same firms that provided these estimates – AECOM, or Booz Allen – has

consistently been devastatingly wrong, not least in the case of Brisbane's RiverCity toll road where reliance on AECOM predictions contributed to a \$1.68 billion dollar loss and commercial failure of the venture. [<http://www.wsj.com/articles/aecom-unit-pays-us-201-million-to-settle-australia-toll-road-lawsuit-1442826365>].

In the absence of the assumptions behind, and the details of the traffic modelling and induced transport forecasts, and in the absence of a transparent business case, it is not possible to evaluate the future impact of the project on land uses.

The New M5 fails to meet this objective.

Fit within the financial capacity of the State and Federal Governments, in partnership with the private sector

The EIS does not contain the assumptions behind the financial modeling so it is impossible, based on the EIS alone, to assess this objective.

The Updated Strategic Business Case does contain enough information about traffic volume and time savings to demonstrate that the westCONnex fails to return its costs and will have a cost benefit ratio well below 1:1.

The executive business case was found by the NSW Auditor-General to be totally inadequate; "it did not meet best practice standards" and the A-G "was not able to form a view [that] the project is a worthwhile and prudent investment ... for the NSW government". Nothing has changed

"Infrastructure NSW should ensure the Major Projects Assurance Framework is fully implemented" said the Auditor-General at the time, and this is still true now.

[<http://www.audit.nsw.gov.au/news/westCONnex-assurance-to-the-government>]

Revenue modelling produced by Mehreen Faruqi, the Greens MLC and a former engineer, showed that even at full capacity, westCONnex cannot physically carry enough traffic to be financially viable - and at full capacity it would be more congested than the M4 and M5 currently are [<http://www.mehreenfaruqi.org.au/westCONnextolls/>].

At full capacity, based on similar infrastructure, westCONnex would have a commercial value of perhaps five billion dollars - less than a third of its cost, assuming no cost overruns during development. [<http://www.smh.com.au/nsw/what-you-need-to-know-about-westCONnex-the-biggest-road-weve-ever-seen-20150313-143ujn.html>]

On all the available evidence, there are alternate projects that will more reliably deliver greater improvements to public mobility, for far lower cost than the billions of Federal and State funds that the westCONnex will absorb – as highlighted above in the ideas proposed by ecoTransit.

All of this should have been properly considered by the EIS.

The New M5 fails to meet this objective.

Optimise user-pays contributions to support funding in a way that is affordable and equitable

Commuters who use westCONnex will be spending up to eighty dollars a week on tolls, even if they use no other toll roads.

This will not be affordable for many of the current users of the M4 and M5, nor is it equitable when they will receive a service that is only a few minutes better than what they currently have, and inferior to what they could have if alternate projects were undertaken instead.

ARAG's analysis suggests that this will fund less than one third of the \$18 billion cost of westCONnex, leaving at least \$12 billion to be funded from the public purse, by tax payers who gain nothing from the toll road.

Further costs fall on those subject to what is euphemistically called Compulsory Acquisition.

The EIS business case only considers benefits, and does not do so properly, and it does not consider to what extent those benefits can and cannot be converted to revenue.

The EIS does not include an adequate assessment of the indirect costs of the project, and of the opportunity cost of forgoing alternate projects. Without this information, consultation cannot legitimately be said to have been undertaken.

The New M5 fails to meet this objective.

Provide for integration with other westCONnex projects and the proposed Southern extension, while not significantly impacting on the surrounding environment in the interim period

The EIS itself acknowledges there are significant impacts in relation to noise, loss of housing and destruction of heritage.

Already, as has happened on the M4 widening, there are issues with asbestos waste being dumped – and at a school; while at Beverly Hills noise walls have been stripped away from the M5 and will stay down for months longer than originally predicted.

The demonstrated costs do not justify the putative benefits.

The New M5 fails to meet this objective.

Protect natural and cultural resources and enhance the environment.

At least 50 hectares of open space and potential open space and a huge amount of vegetation would be lost across the westCONnex routes.

A large number of heritage buildings, including homes and businesses, would be demolished. Communities are being decimated. This objective, to protect natural and cultural resources, is not being met

The demonstrated costs do not justify the putative benefits.

The New M5 fails to meet this objective.

Failure to meet Objectives

Ultimately, the EIS claims to meet all its objectives through the mechanism of reducing congestion.

The predicted improvement in travel times, by 2021, in the order of 'up to' 10-15 minutes, according to the EIS, is only for the longest trips.

This small saving - if it ever truly materialises - is insufficient to offset the financial cost to road users, the loss of amenity to local communities, the loss of homes, the loss of businesses (especially small businesses), the environmental damage, the destruction of heritage, the financial cost to the wider taxpayer, and the opportunity cost of not proceeding with alternate projects.

The EIS assumes unquestioningly that entrenching development towards Sydney's CBD is a desirable goal.

Some planners, including the Committee of Sydney's CEO Tim Williams, argue that a key driving principle of planning for Greater Sydney should be de-centralisation with an emphasis on enhancing the centres of Liverpool and Parramatta, which are nearer the geographic centre of the city [<http://www.smh.com.au/nsw/committee-for-sydneys-tim-williams-slams-road-building-plans-for-city-20150428-1mv3vq.html>].

The EIS does not comply with the Secretary Environmental Assessment Requirements (SEARS).

The SEARS provide for an analysis of feasible alternatives to the proposal and any justification, including:

- An analysis of alternatives/options considered, including public transport, having regard to the proposal objectives (including an assessment of the environmental costs and benefits of the proposal relative to alternatives and the consequences of not carrying out the proposal), and whether or not the proposal is in the public interest,
- Justification for the preferred proposal taking into consideration the objects of the Environmental Planning and Assessment Act 1979,
- Details of the alternative ventilation options considered during the tunnel design to meet the air quality criteria for the proposal,
- Details of the short-listed route and tunnel options from the tender process and the criteria that was considered in the selection of the preferred route and tunnel design, and staging of the proposal and the broader westCONnex scheme, and in particular access to Sydney Airport and Port Botany and improved freight efficiencies.

The EIS does not include cost-benefit analysis, modelling, or any other objective analysis of feasible alternatives. Only cursory descriptions are provided.

No alternative staging strategies are described or objectively assessed.

The EIS remains a roads-only focused document.

The EIS does not adequately address the health impacts

There is no assessment of construction and operational activities that have the potential to impact on in-tunnel, local and regional air quality. The air quality impact assessment must provide an assessment of the risk associated with potential discharges of fugitive and point source emissions on sensitive receivers.

In addition, an accurate assessment of air quality impacts is dependent on an accurate assessment of traffic and transport impacts. Because the traffic and transport impacts have not been correctly modelled, the air quality impact and human health impact assessments are worthless.

The in-tunnel air quality will be poorer than that for surface roads. People using the tunnels on a regular basis will have a higher risk of lung cancer, asthma, heart disease and other diseases. The health of children being driven through the tunnels is a particular concern.

We see this today as we use the existing M5 tunnels. It is as if we are driving through a fog, such is the appalling quality of the in-tunnel air.

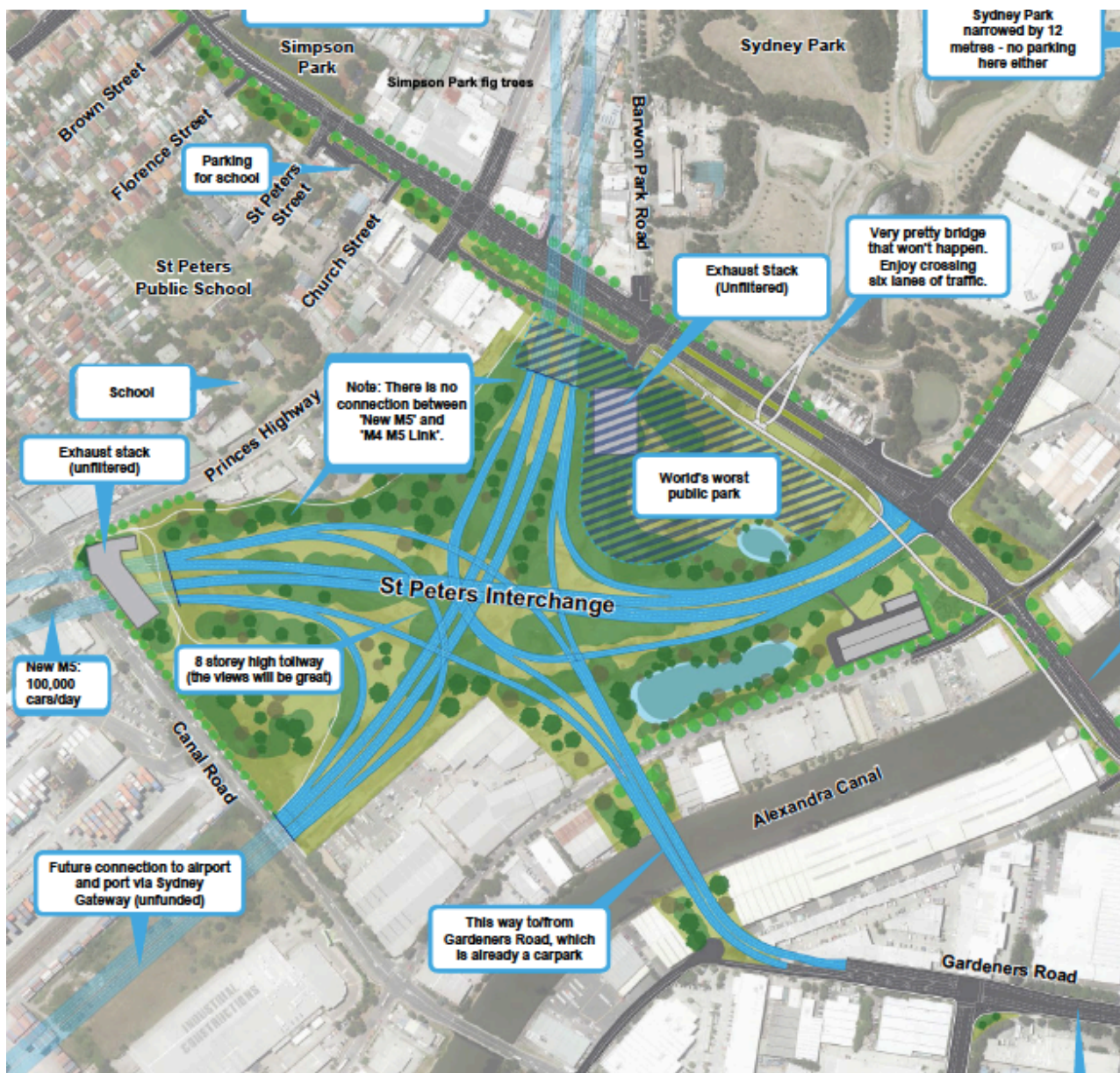
There are serious concerns about the fact that westCONnex plans to have unfiltered exhaust stacks near playgrounds, schools, aged care facilities, green spaces (such as Sydney Park) and of course, housing. In no way is this acceptable.

Regional air quality in Sydney is already poor, with air toxin levels regularly exceeding standards. Even when they do not exceed standards, they still cause health problems. There is no safe level of air pollution.

Increasing road traffic (cars and trucks) will result in poorer regional air quality. The air quality modelling in the EIS is unreliable because it is based on flawed traffic modelling.

Future conditions with the project are not articulated

Delays at on-ramps and off-ramps have been omitted from the travel time forecasts, so actual travel times will be significantly higher than those forecast. It is also interesting that the reported travel times savings have been selectively chosen to show only those routes where travel times are forecast to decline (i.e., the M5 itself).



St Peters 'Crown of Thorns' interchange

The impacts on travel times for adjacent routes have not been reported, in particular Stony Creek Road, Canterbury Road Forest Road and Queens Road.

Travel times on these routes will increase significantly due to the large increase in rat-run traffic diverting in order to avoid the M5 tolls.

Network performance measures (VKT, total travel time, average speed etc.) for the whole study area have not been modelled/reported, nor have they been supplied for the larger metropolitan area.

Only performance measures for the immediate area around the St. Peters 'Crown of Thorns' Interchange that are closest to Alexandria residents have been reported.

Without this information, we can only assume the worst.

Direct impacts on Alexandria (and surrounding suburbs)

From about 2019, the M5 will terminate at Sydney Park.

70,000 vehicles are forecast to use Euston Road. This is more traffic than currently uses Victoria Road. It is almost **ten times** the traffic that Euston Road currently handles, or can handle.

An extra lane in each direction will be added to Euston Road – but not very far along Euston Road. According to the EIS, the northbound lane will go as far as Maddox Street, where it becomes a new left-hand turn lane, channelling traffic off Euston Road and into Maddox Street.

It will no longer be possible to turn right onto Sydney Park Road from either Euston Rd and probably not from Mitchell Rd either.

Drivers wanting to reach the Princess Highway or May Street will have drive around Sydney Park to Campbell Road, or rat-run north through local roads to King Street. It seems likely that the intent is to encourage drivers to use westCONnex instead of the free alternatives.

We know that the development in Green Square is already generating significant traffic, and that this will increase, and that Ashmore Estate, which will add over 6,000 residents to the Alexandria/Erskineville area will also generate significant traffic.

As Duncan Gay said to Chris Smith on radio 2GB in January 2016,

“There's a problem there now. To put your head in the sand and say everything's fabulous in Alexandria, Erskineville, Waterloo, Zetland is just rubbish. The thing is congested, that area, great area, I live near there in Redfern myself, like you. It's a great area but the increased housing that's already there plus the industrial, the place is already gridlocked.”

The EIS does not consider the traffic that will be generated by Ashmore Estate and Green Square will continue to be a problem, because the EIS states that the M5 will be completed before the Ashmore Estate and Green Square reach full capacity.

The government is not concerned with the effects on the local road system that will result from the construction of westCONnex.

They should be. According to the EIS, the new roads are going to make traffic worse, not better. The following tables outline the 'Levels of Service' (LoS) that are predicted in the morning (AM) and afternoon (PM) timeframes.



What a mess!!

Table 99 Overview of AM peak hour intersection levels of service ('with project' scenarios)

Intersection	2014 Base	2021 'without project'	2021 'with project'	2031 'without project'	2031 'full WCX'
Princes Highway / Sydney Park Road	C	B	C	F	C
Princes Highway / May Street	E	B	C	C	A
Princes Highway / Campbell Street	D	C	E	D	F
Princes Highway / Canal Road	E	C	F	F	C
Princes Highway / Railway Road	F	F	F	F	F
Sydney Park Road / Mitchell Road	C	B	D	B	D
Euston Road / Sydney Park Road / Huntley Street	A	A	C	A	C
Unwins Bridge Road / Campbell Street	C	B	C	B	D
Campbell Road / Euston Road	A	A	C	A	D
Campbell Road / Bourke Road*	-	-	C	-	D
Rickety Street / Kent Road*	-	-	C	-	B
Gardeners Road / Kent Road*	-	-	C	-	C
Gardeners Road / Bourke Road	C	C	D	D	D
Gardeners Road / O'Riordan Street	E	F	F	F	F

Source: AECOM (2015)

* These intersections are either new or substantially changed as a result of the project and so were not reported on in the base or without project scenarios.

AM Traffic

Table 100 Overview of PM peak hour intersection levels of service ('with project' scenarios)

Intersection	2014 Base	2021 'without project'	2021 'with project'	2031 'without project'	2031 'full WCX'
Princes Highway / Sydney Park Road	D	F	C	F	C
Princes Highway / May Street	D	D	A	D	A
Princes Highway / Campbell Street	D	C	E	F	E
Princes Highway / Canal Road	F	E	D	F	C
Princes Highway / Railway Road	E	F	D	F	F
Sydney Park Road / Mitchell Road	D	B	D	D	D
Euston Road / Sydney Park Road / Huntley Street	D	A	C	E	C
Unwins Bridge Road / Campbell Street	C	C	D	F	D
Campbell Road / Euston Road	A	A	D	F	E
Campbell Road / Bourke Road*	-	-	B	-	E
Ricketty Street / Kent Road*	-	-	C	-	C
Gardeners Road / Kent Road*	-	-	B	-	C
Gardeners Road / Bourke Road	C	C	D	E	F
Gardeners Road / O'Riordan Street	D	D	F	F	F

Source: AECOM (2015)

* These intersections are either new or substantially changed as a result of the project and so were not reported on in the base or without project scenarios.

PM traffic

A LoS of 'A' is good. F is 'over capacity'.

According to the modelling in the EIS, 'With Project' will make Euston Rd two levels of service worse than it would be 'Without Project', a drop from LoS 'A' to LoS 'C'.

The problem is, Euston is not currently LoS 'A', either in the morning peak despite what Table 99 says, and especially not in the afternoon peak where, as Table 100 says, it is already LoS 'D', at best.

If as forecast, westCONnex New M5 worsens Euston Rd by two LoS, it will not be from LoS 'A' to LoS 'C', it will be from LoS 'D' to LoS 'F', or worse.

Euston Road currently struggles to carry 7,600 cars a day.

Expanding it from one or two lanes out to two or three lanes is not going to allow it to carry 60,000 or 70,000 cars. That's 50% more traffic than Victoria Road can carry.

Even if you added 10 lanes, you won't get 10 times as much traffic down the road. You might not get any more than the 7,600 cars you get now, as there is nowhere else for the traffic to 'disperse' – a term the WDA and the Minister for Roads is happy to use.

As soon as you reach the end of the widening, these roads go back to the same number of lanes as they have now, connected to streets that are themselves no wider than they are now.

Even if they were widened all the way to the ocean, the roads that they feed are also bottle-necked. Technically, Euston Road should already carry more cars than it does, except that there isn't anywhere for that traffic to go.

westCONnex won't change that. It will probably make it worse.

The same is true of the Princes Highway. It is a bottleneck, surrounded by bottlenecks.

Adding the New M5 cannot improve total traffic throughput by much, if at all. While it will add some minimal capacity, because the 'bottle' still ends in the same pinch points, you don't get any more cars per hour.

The effect is that you actually travel slower because there are more cars than before, and you will do it underground. But you still end up at the same bottleneck.

The only reason to believe that the M4 and M5 might improve (and this is what the EIS claims will happen) is because people won't be able to afford to use them – they will use free roads instead.

If that happens, then the M4 and M5 will become faster, but only for those that can afford to use them, while roads like Parramatta Rd and Stoney Creek Road will become slower.

The only way that westCONnex will improve congestion on the M4 and the M5 is by forcing anyone who can't afford the tolls to find another road.

Even many of those who will continue to travel on the M4 and M5 will be worse off for it – compared to what they have now. The M4 and M5 may be slightly faster, claimed as only 1 km/h overall, but it will be far more expensive.

That, for some people, will be a more preferable outcome to the free alternatives as they will be on westCONnex, but it does not mean that those people would not have been better off with the 'Without Project' M4 and M5.

However many lanes are added to Euston Road and other local roads, they will still be gridlocked, because of Induced Demand.

Despite the projections that 'the next Stage will fix everything' (which has always been claimed but has never been proven yet), Euston Road and Campbell Road will back up, and the ramps will block up as well.

Whatever the performance of the New M5 itself, it will still be a tunnel to a traffic jam, and it will still have a carpark at the end of it.

westCONnex will create a road system that will carry less people than before, with a few traveling slightly faster but at a price, while the rest are traveling slower than ever.

In short, westCONnex is an expensive, but guaranteed way to make Sydney's roads worse.

Noise and Vibration

On ARAG's reading of the EIS chapters, there are impacts on Alexandria both on the noise and vibration front, but the main impact on us is noise. The EIS generally dismisses vibration as an issue that won't cause us problems. (for example See, [Vol 2D, App J](#) Page 149 5.5.2).

There are a couple of points worth making and they fall into Broad and Specific, as follows:

Broad impacts:

- the plan is to create the tunnels by blasting rather than by mechanical excavation. The justification appears to be speed and shorter burst impacts on any given area. There are many assurances about control and precedent, but you have to think it is inherently more risky and uncontrolled.
- the Interchange and surrounding roads program is a 2.75 year construction project.
- hours of operation: Normal hours are 7am-6pm; evening is 6pm-10pm; night is 10pm-7am. However, pretty much anything the construction companies want can be done during the

evening and night shifts if they deem it safe and/or appropriate to do so! And noise mitigation measures would be the same, whether day or night. (see Vol 1B, Ch 12, Page 62)

- each designated Noise Catchment Area (Alexandria is NCA1) only has one data logger. In our case it was at the edge of Sydney Park between Mitchell Road and Euston Road.
- re Project Impact, everywhere where the project impact is more than 2 dB to noise levels, those areas are consistently characterised as ‘Highly Urban’, allowing a justifiable higher level of ambient noise. The boundaries between ‘Highly Urban’ and other areas are very inconsistent and not generally good for us. Example at Vol2D, Appendix J, Appendix F – St Peters Interchange Study Area.

Specific impacts:

- while the ventilation stacks at Kingsgrove and Arncliffe are to be approximately 30 m above ground, the St Peters ventilation stacks will be about 20 m above ground ‘in line with the Australian Government’s Civil Aviation Safety Authority requirements’. (Vol2D, Appendix J, pg15, Table 3)
- traffic figures: Euston Road goes from 11,400 vehicles per day in 2021 if WC is not built, to 71,000 vehicles per day if it is built. (Vol 2D, App J, Appendix E, page 1)
- noise levels predicted in 2021 and 2031: if the project is built, all properties along Sydney Park Road and both sides of Euston Road will register the highest noise level band, i.e. >65 dB at both day and night (Vol 2D, App J, Appendix L – Operational noise results).
- four properties in Euston Road and Lawrence Street are identified as eligible for sound mitigation, with many more to be eligible in St Peters and elsewhere. (Vol2D, App J, Table 111, and Appendix M – Operational noise results – road traffic tables). The inconsistency is that where noise levels are identified as ‘Exceeding Cumulative Limit’, in some cases the property in question is eligible for assistance, and in other similar situations, they are not eligible.
- there is no measurement of the impact of construction traffic coming from the north to the St Peter’s Interchange site. So, no modelling of the impact on Euston Road or Mitchell Road, etc has been carried out. (Vol 1B, Ch 12 Table 12-42 and following)
- out of hours construction work for road tie-in works is predicted to cause excessive noise for 974 receivers in our broader area and sleep disturbance levels for 425 receivers. Kerbing and drainage work is predicted to cause excessive noise for 1262 receivers in our broader area and sleep disturbance for 804. The figures for Alexandria specifically are 163/67 and 180/151 respectively. (Vol 1B, Ch 12, Page 69 Table 12-34)
- there is a lot of excessive noise to be endured by the residents of St Peters in particular, but also Sydney Park and Alexandria. For example, in St Peters rock hammering will result in an excess of 50 dB above benchmark, 248 receivers will exceed the normal limits and of those 100 will be highly noise affected. Even earthworks with no rock hammering will result in an excess over normal of 40 dB; 161 receivers will exceed the normal and of those 86 will be highly noise affected. (Vol 1B, Ch 12, Page 54, Table 12-22)
- meanwhile, everyone will suffer excess noise from kerbing and drainage works. In Alexandria, the excess above normal will be 43 dB; 45 receivers will be affected and 13 will be highly noise affected (Vol 1B, Ch12, Page 55, Table 12-22).

westCONnex admits that the ‘New’ M5 won’t work.

SYDNEY Motorway Corporation (SMC) has admitted that the westCONnex New M5 will cause incalculable traffic congestion unless other unplanned and largely unfunded toll road projects – including the westCONnex M4-M5 link, the Sydney Gateway and southern extension – are built as well.

In an email sent to Ben Aveling of Alexandria Residents Action Group (ARAG), Louise Bonny of the SMC admitted only 80% of the “significant increase” in traffic they expect the New M5 will generate around the St Peters Interchange could be accommodated by the existing road network. Ms Bonny went on to explain they were relying on the other toll road projects, saying:

“...the construction of the additional road network components proposed as part of the westCONnex M4-M5 Link, Sydney Gateway and Southern extension projects provide the additional road space and increases the ability to distribute and accommodate the predicted increase in traffic.”

In the same email, Ms Bonny said that the model the SMC is using to forecast traffic flows was unable to predict what would happen if these additional toll roads are not built, because *“the model does not function properly and presents results that can be misleading.”*

This is quite an amazing and damning admission. It acknowledges that they cannot model the New M5 without these extra road components – the numbers are so far off the scale that the model cannot begin to predict how bad congestion will be. Even with the extra road components, the model shows that this is a tunnel to a traffic jam.

Roads Minister Duncan Gay has admitted (on radio station 2GB) that streets in this area are ‘already gridlocked’. So why is the government deliberately planning to send thousands more cars a day into this area? The government is trying to force a scenario where more and more toll roads have to be built.

westCONnex Action Group (WAG) has stated that “It’s astonishing that even the people who want to build westCONnex now admit they’re relying on building more costly toll roads to try and make the New M5 work”.

Even if the funding for all these additional toll roads comes through – and it’s a very big ‘if’ – the New M5 will be open for years before the M4-M5 Link and Sydney Gateway are built. And the government hasn’t even set dates for funding or building the southern extension.

What is truly staggering is that the SMC has admitted it can’t even model the traffic impacts of the New M5 without these other toll roads – yet it’s now seeking planning approval for the New M5 as a standalone project.

This latest damning admission proves what ARAG has said all along: westCONnex will choke Sydney’s streets with cars, and see drivers from western Sydney pay huge tolls to drive straight into inner-city traffic jams.

In conclusion, the Alexandria Residents’ ActionGroup (ARAG) registers its most strenuous objection to the M5 westCONnex project.

The failure by the government to deliver a business case that it is openly prepared to own, and to deliver an EIS that is truthful and consistent with its claims, is reprehensible and an affront to the taxpayers of NSW.

This process fails all the tests of probity, transparency, accountability, accuracy, fiscal responsibility, evidence-based decision-making and good government.

Governments talk of receiving a ‘mandate’ from the voters.

There is one, and only one ‘mandate’ that matters – delivering honest, open unbiased, evidence-based governance of the affairs of the State of New South Wales.

There is no place for hubris, or slavish adherence to out-dated ideologies such as roads, roads, roads.

With westCONnex, this government has failed miserably to honour the gift of the mandate from the citizens of New South Wales.

ARAG makes this submission on the understanding that you will publish a list of submitters including our details, our suburb and our submission. Indeed, we DEMAND that these details be published.



Vanessa Knight
Co-Convenor



Ben Aveling
Co-Convenor