4866

[redacted]

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Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: Yes

Name: Wendy Bacon

[redacted]

Newtown, NSW
2042

Content:
Like many thousands of others from the NSW community, I am strongly opposed to the Westconnex series of tollways. I opposed to the project because the evidence provided by those who want to build it at huge public expense is weak and not accepted by expert and independent consultants. I believe the project will embed car dependency and not solve traffic problems. One only has to consider the traffic evidence and see that so many intersections are at level E or F and the tunnels would be at capacity to by 2031 to know that there must be a better use of $15.5 billion.

I would prefer to see a mix of alternatives including much better public transport across the West of Sydney. For as long as I can remember there have been complaints about under investment in public transport in Sydney, particularly in the West. The alternatives section is very superficial and does not consider in any serious way at all alternatives involving demand management as well as public transport.

I am also deeply offended by the process that has been used to push this project through.

I am strongly opposed to planning proceeding without any transparent business case. I am opposed to contracts being let before the planning process is complete. I am opposed to the fact that we d-on't know the terms of those contracts and what clauses allow for the project not to go ahead. In response to a question, the Minister for Planning Rob Stokes said that he would treat the decision about Westconnex projects in the same way as other decisions. I am told by the Department of Planning that all issues raised will be subject to rigorous assessment. I remain to be convinced - however as a journalist and a citizen I want to belief that our processes are open to evidence and decision making in the public interest. I will follow this process through and report on it.

For much of this year, I have researched the project. While I will never be an expert on transport and traffic, I have learned however that there are very serious debates about traffic modelling,and transport policy. What I do know is that this EIS does not engage this those debates or the evidence provided in already published critiques of traffic modelling.

I object to the fact that AECOM has prepared this EIS. I have spoken to AECOM people at EIS sessions for the M5 tunnel. It is quite clear that they seem themselves as proponents of the project. They lack the necessary independence to produce a study of this kind. This company has been involved in developing a business case for the Westconnex since 2013 and have long promoted it on their website. I know there are many excellent engineers working for AECOM but given their commercial interests in the project and their history of poor traffic modelling, their role in the overall management of this EIS is unacceptable.

I object to the short period that has been allowed for consultation. It has not been possible for the public to raise funds for independent consultants. I have noticed that Ashfield Council and transport Planner have pointed out many ways that the EIS has not met the SEARS - and wonder why the Department of Planning even accepted it without requiring more work. My correspondence on this has been included in the People's M4 EIS.

I have noticed that the 'build case' depends on Parramatta Rd bus lanes that are not in the scope of this project. How is that possible? These bus lanes are not even planned for the end of this project. Indeed at a recent Urban Growth proposal session at the Ashfield Bowling Club, they were presented as one of a range of possibilities for Parramatta Rd.

I am also confused about why the Build scenario included the Southern Extension. This motorway is not yet at a serious proposal stage and is deeply opposed by many residents in the Southern suburbs of Sydney. Why does the build scenario for 2031 need to include this motorway? What benefit has it been calculated to offer? I could not find that in the EIS.

I could also find no modelling of what the cumulative impacts of BOTH the M4 and M5 would be on traffic throughout the Inner West. Residents are extremely concerned that the tunnels could be build and the management of the impacts on surrounding roads would be left to the RMS. The regional and local impacts should be modelled across the Inner West for 2021.

I am concerned at the number of issues that have been left to the design phase. Friends at Beverly Hills have found that noise walls have come down for months longer than originally predicted while residents on the M4 widening at Granville are very disturbed about the noise and contamination issues that have accompanied construction works. The latter issues were raised during the consultation period for the M4 widening but were effectively ignored by the Department of Planning. (See submission from Granville on M4 widening EIS site signed by 66 residents.)

I am very concerned about serious problems being fobbed off to the 'condition' phase. One only has to be aware of how the new M5 proposal is remove protective policies that were part of the old M 5 to know how unreliable 'conditions' can be.

I have interviewed a number of residents along the M4. There have been consistent and continual complaints by people that they are being pushed out of their homes - there is a feeling along the corridor that WDA and construction companies behave as though they already have approval. The Social Impact study fails to grasp the extent of the social disruption through flawed and superficial methodology
As time has run out I must post this submissin

[redacted]

From: Wendy Bacon [redacted]>
Sent: Monday, 2 November 2015 11:56 PM
To: information-Planning
Subject: Project ref: SSI 6307, WestConnex M4 East submission

Attn: Secretary

Dept of Planning & Environment

I am writing to express my strong objection to the SSI 6307 WestConnex M4 East EIS and to formally request a response to my concerns.

I strongly object to the entire WestConnex for a number of reasons. Global experience and research has shown conclusively that these kinds of toll road mega-projects are hugely expensive and counterproductive. WestConnex will increase air pollution and traffic, and expose NSW taxpayers to unacceptably high levels of financial risk. It is not a long-term solution to Sydney's congestion problem.

The fact that the State Government has already signed multi-billion dollar contracts for WestConnex before this EIS was even placed on public exhibition undermines community confidence that this is a genuine consultation process.

Failure to abide by the Major Projects Assurance Framework and employ best practice governance from project inception has also greatly reduced community confidence in WestConnex, including the M4 East EIS. The Community is being asked to comment on an EIS that is deficient in analysis of project justification.

A condition of consent for the M4 East should include adherence to the NSW Government's Major Projects Assurance Framework. Vital gateway reviews which should have been undertaken before the preparation of the EIS (and certainly before awarding construction contracts) should be commissioned, completed and made publicly available before any further approvals are issued.

In regards to this WestConnex M4 East proposal, I strongly object to the following points, and I ask you to respond to each in your reply:

• I strongly object to the lack of transparency in the entire WestConnex process. Billions of dollars of contracts have been let without a full business case having been released or the project being subjected to independent Gateway reviews.

• I strongly object to the short 55-day timeframe in which members of the community have been given to respond to the EIS for the M4 East. This document runs to nearly 5,000 pages, but the public was only given 55 days to respond – despite hundreds of people calling and emailing the Minister for Planning to explain why this was not enough time.

• I strongly object to AECOM being paid millions of dollars of public funds to play the key role in the EIS for the M4 East. AECOM has been awarded other WestConnex contracts that give it a huge vested interest in the project going ahead, and this is demonstrated by the lack of independence and superficial analyses that characterise this EIS. In addition, AECOM has been sued for being negligent in relation to its past traffic studies, and has already paid more than $250m in settlement costs.

• I strongly object to having each section of the WestConnex assessed separately. Vague rationales for the whole project are used to justify the serious negative impacts of each stage. Projects such as the Southern motorway F8, which are not even at a planning stage, are included in the argument for the project without explanation.

• I strongly object to the failure to consider total negative impacts against the total claimed positive aspects. While the M4 East EIS repeatedly makes references to the positive impact of the entire WestConnex when arguing for the project, it fails to consider the negative impacts of the whole project – such as loss of housing, heritage and biodiversity.

• I strongly object to the failure to provide enough data to allow independent experts to verify the M4 East EIS's traffic analysis. For example, a detailed study undertaken by SGS Economics & Planning for the City of Sydney concluded that WestConnex would make traffic worse on Parramatta Rd, Victoria St and many local roads. The M4 East EIS claims it will improve traffic, but offers very little data that would allow experts to objectively assess this analysis.

• I strongly object to spending $15.4 billion for small savings that will not benefit most commuters. Instead of spending this amount of money to benefit a very small percentage of drivers in Sydney, and cut just one minute off overall road network traffic speeds, the NSW Government should be investing in public transport, traffic management solutions, and regional city centres to address traffic congestion and boost NSW's economic prosperity in the long term.

• I strongly object to the poor analysis of alternatives undertaken in the M4 East EIS. This section of the EIS is superficial and amounts to nothing more than a roundabout way of saying that the M4East tunnel project is preferred by WestConnex.

• I strongly object to the huge impact that the flow of cars and trucks out of tunnel exits. This will gridlock local roads throughout the Inner West.

• I strongly object to hundreds of residents being forced from their homes and businesses for the M4 East, and the failure of the EIS to assess the social impacts of this. Forcibly acquiring and destroying over 200 homes and businesses will result in massive social disruption in communities. There have been numerous reports of homeowners and tenants being inadequately compensated for the loss of their properties. These acquisitions were in motion before the EIS was even completed. Yet the EIS Social Impact study failed to do any direct research on the impact of forced acquisitions on residents.

• I strongly object to the health risk and air quality analysis, which fails to assess the true impact of the M4 East. The claim is even made that WestConnex will improve local air quality – which will surely make it the first motorway in history to do so!

• I strongly object to the total inadequacy of the M4 East biodiversity assessment. This 'analysis' is based on insufficient studies. No attempt is made to assess cumulative impacts of the entire WestConnex project on loss of open space, gardens and other vegetation.

• I strongly object to the wholesale destruction of heritage homes and precincts. This is not acceptable, particularly for a project that will not resolve but add to Sydney's traffic congestion.

• I strongly object to the failure of WestConnex consultants to directly consult with business owners. Local business owners were not approached by WestConnex about the impact the M4 East would have on their livelihoods, despite the fact that many stand to see their businesses destroyed as thriving streets precincts are drowned in traffic.

I therefore call on the Minister for Planning to reject this proposal on the grounds that:

• Even the M4 East's inadequate traffic analysis shows that WestConnex will be at capacity by 2031.

• AECOM has not even met the basic Planning Secretary's requirements in its assessment.

• This is an outdated project that is not consistent with current trends in thinking about public transport, urban planning and livability of cities.

I recognise there is pressure on several NSW Departments, including Planning and Environment, to approve this project. I remind public servants of their obligation to the public and to the potential social, health and economic costs of spending $15.4 billion on WestConnex when it provides no solution to Sydney's transport needs.

[redacted]

Political Donations Disclosure Statement to Minister or the Director-General

If you are required under section 147(3) of the Environmental Planning and Assessment Act 1979 to disclose any political donations (see Page 1 for details), please fill in this form and sign below.

Disclosure statement details

Name of person making this disclosure	Planning application reference (e.g. DA number, planning application title or reference, property address or other description)
WENDY BACON.	SSI 6307 M4 East.

Your interest in the planning application (circle relevant option below)

You are the APPLICANT **YES** / (NO) OR You are a PERSON MAKING A SUBMISSION IN RELATION TO AN APPLICATION (YES) / **NO**

Reportable political donations made by person making this declaration or by other relevant persons

** State below any reportable political donations you **have made** over the 'relevant period' (see glossary on page 2). If the donation was made by an entity (and not by you as an individual) include the Australian Business Number (ABN).*

** If you are the **applicant** of a relevant planning application state below any reportable political donations that you know, or ought reasonably to know, were made by any persons with a financial interest in the planning application, OR*

** If you are a **person making a submission** in relation to an application, state below any reportable political donations that you know, or ought reasonably to know, were made by an associate.*

Name of donor (or ABN if an entity)	Donor's residential address or entity's registered address or other official office of the donor	Name of party or person for whose benefit the donation was made	Date donation made	Amount/ value of donation
Wendy Bacon.	64 Gowrie St Newtown 2042	MAU Greens.	3/7/14	100
"	"	"	29/9/2014	"
"	"	"	29/10/2014	"
"	"	"	29/1/2015	"

Please list all reportable political donations—additional space is provided overleaf if required.

By signing below, I/we hereby declare that all information contained within this statement is accurate at the time of signing.

Signature(s) and Date Wendy Bacon. 27/1/2016.

Name(s) WENDY BACON

Cont

Political Donations Disclosure Statement to Minister or the Director-General

Name of donor (or ABN if an entity)	Donor's residential address or entity's registered address or other official office of the donor	Name of party or person for whose benefit the donation was made	Date donation made	Amount/ value of donation
Meryl Bacon.	64 Gourlie St. Newtown.	NSW Greens.	8/12/2014	130
"	"	"	28/2/2015	100
"	"	"	29/3/2015	100
"	"	"	24/3/2015	500
"	"	"	17/2/2015	100
"	"	"	8/1/2015	50
"	"	"	29/12/2015	100

A People's M4 EIS

A People's M4 EIS

This website exists to help people take back some control over the planning process. It is independent of any other organisation and is entirely volunteer run and funded.

Our aim is to help people access information needed to understand how the NSW Baird government's 33 kilometre Westconnex tollway project would affect not just transport options but also the future environment and health of Sydney. The People's M4 EIS is part of a broader community attempt to open up public debate about the Westconnex and counter the lack of transparency in decision making surrounding it.

The Westconnex is a single project, to be delivered in five separate stages. This means that while supposed broad benefits of the whole project are constantly proclaimed by the NSW government and Sydney Motorway Corporation, the negative impacts of the whole project are never assessed.

The EIS for the Westconnex M4 East was published by the NSW Department of Planning as a large PDF document – over 1GB, and nearly 5000 thousands of pages – on September 9, 2015. The community was given only 45 days to submit responses, although this was extended by ten days to November 2 because of a failure by the Westconnex Delivery Authority to file all the required documents.

Before waiting for the results of the EIS and planning process, the Westconnex Delivery Authority has already awarded the contract to build the M4 East to a consortium led by CIMIC (previously Leightons) and Samsung.

The way that NSW Planning Department and the Westconnex Delivery Authority have designed and published the EIS does not make it accessible. We've made it a little easier to find the bits you want (http://m4eis.org/category/table-of-contents/) in the PDFs.

We have published several parts of the EIS in a format that is easier to read (http://m4eis.org/category/selected-sections/) and enables you to cut and paste text more easily to build your own submission.

We have solicited and shared some 'plain English' commentaries to help you to make your own informed assessment of the Westconnex M4 tunnel. One of the problems with the EIS is that it fails to engage with contemporary developments in transport planning and critiques of its approach. This is a serious problem when the decisions to be made will have a huge impact.

We will be publishing some sample submissions, so that you can see what other people do or don't like about the M4 East project.

You can comment on any page or reply to anyone else's comments. If you have made a submission you would like us to share, please let us know. If you have ideas for how we can develop the People's EIS, leave a comment on this page.

In this way we hope together to break through the daunting amount of data and help the community to build strong individual and group responses.

Your contributions will help build an independent source of information for the community about the project.

Here's how you make a submission to the official planning process :

http://m4eis.org/2015/09/11/how-to-object/ (http://m4eis.org/2015/09/11/how-to-object/)

Additional Note on November 2

Parts of the People's M4 EIS has been submitted to the NSW Department of Planning to be considered as part of the assessment process.

We will continue provide updates on the rest of the planning process.

People: Many people have contributed to this project including Ben Aveling, Wendy Bacon, Luke Bacon, Henare Degan, Nicole Gooch, Miska Mandic and others.

7 thoughts on "**A People's M4 EIS**"

1. **Kerry** says:
   27/09/2015 at 11:10 am Edit

   Fantastic! Thank you to those who have worked so hard to get this site up-and-running. It will assist us residents to share our concerns and share what we have learned in interactions with the WDA "team".

Reply (http://m4eis.org/?replytocom=45#respond)

2. **Kathryn Calman** says:
   27/09/2015 at 3:14 pm Edit

   This is an amazing piece of work that you have put together. Thank you!!!

   Reply (http://m4eis.org/?replytocom=46#respond)
3. **Anthony johns** says:
   30/09/2015 at 9:44 pm Edit

   I think the project would be more worthwhile if it were less obviously partisan. As it stands, it's hard to believe anything you solicit written in "plain English" won't just be polemic

   Reply (http://m4eis.org/?replytocom=47#respond)
   - **wendybaconblog** says:
     01/10/2015 at 3:34 pm Edit

     The EIS is written entirely from the perspective of the 'proponent' which is Westconnex. Aecom that managed and prepared much of the EIS has involvement in many aspects of this project – from concept design to 'traffic director'. So it is reasonable to warn people to treat official EIS data and its presentation with scepticism. Likewise claims of critics should also be tested. One of the ideas behind the project is to subject the empirical claims to scrutiny so if you see any factual claims by critics you think are false Anthony Johns please be sure to comment.

     Reply (http://m4eis.org/?replytocom=48#respond)
4. **Michael Luis** says:
   06/10/2015 at 8:30 pm Edit

   Keep up the good work.
   Big thanks to all the contributors.

   Reply (http://m4eis.org/?replytocom=76#respond)
5. **Janet Dandy-Ward** says:
   26/10/2015 at 10:22 pm Edit

   Thank you so much for putting this together, this is really great information!

   Reply (http://m4eis.org/?replytocom=233#respond)
6. **Phil Siefert** says:
   31/10/2015 at 5:43 pm Edit

   Given the steps that have been taken by the NSW Government to privatise Westconnex Delivery Authority and NSW Planning department in the name of "fast tracking": such as construction awards before planning approval, lack of independent review, and no obvious review of public transport options – I have never felt more sceptical and disillusioned by a government.

   Thank you for the clarity of your submission —

   Reply (http://m4eis.org/?replytocom=302#respond)

Blog at WordPress.com (https://wordpress.com/?ref=footer_blog). The Big Brother Theme (https://wordpress.com/themes/big-brother/).

A People's M4 EIS

Does Westconnex meet its core objectives ?

17/10/201525/10/2015 wendybaconblog Commentaries & Objections Alexandria Landfill, Asbestos, Badgery's Creek, Global economic corridor, Haberfield, King Georges Interchange, Liverpool Rd, M4 Widening, Parramatta Rd., Traffic congestion, traffic modelling, Urban Growth, Victoria Rd, Westconnex M4 East objectives

Some contributors have drawn the attention of the People's EIS to the core objectives of the Westconnex M4 East project. They argue that we should assess the project against them rather than on a topic by topic basis. This is another approach which seems worthwhile.

The objectives are set out in the Executive Summary (http://m4eis.org/2015/09/18/executive-summary-westconnex-m4-east-environmental-impact-statement/) which we have already published.

We will focus on some of these in detail later but in the meantime, here's an overview with some residents' comments.

Do you have anything to add to this section? If so contribute a comment or supply your details for contact at the end of this post.

Objectives

Support Sydney's long-term economic growth through improved motorway access and connections linking Sydney's international gateways (Sydney Airport and Port Botany), Western Sydney and places of business across the city

Sydney traffic congestions costs the economy billions of dollars each year. The question is: How far will Westconnex go to solving that traffic congestion? One analysis has already raised serious questions about traffic modelling (http://m4eis.org/2015/10/17/major-flaws-in-westconnex-eis-traffic-report/).

Another says that that there will be more congestion along the Parramatta Rd corridor (http://m4eis.org/2015/10/15/eis-admits-deterioration-in-parramatta-road-traffic-after-m4-east/). If the Westconnex leads to more traffic congestion in the Inner West and routes into the CBD, it will not improve access to businesses. It may depend which businesses you are considering but thousands of small businesses in Haberfield, Newtown and St Peters have not been consulted and fear that their livelihoods will be damaged not enhanced.

Why doesn't this objective mention Badgery's Creek airport which would be another international gate way, improving connections for Western Sydney, especially if there is a railway to the airport? Some are even asking whether the Westconnex was not partly driven by a desire by private interests to embed Sydney Airport's commercial advantage as the key international gateway.

Relieve road congestion so as to improve the speed, reliability and safety of travel in the M4 corridor, including parallel arterial roads. Cater for the diverse travel demands along these corridors that are best met by road infrastructure

Contributions to the People's EIS analysis (http://m4eis.org/2015/10/15/eis-admits-deterioration-in-parramatta-road-traffic-after-m4-east/) appear to show that Westconnex will not solve congestion on arterial roads such as Parramatta Rd, Victoria Rd or Liverpool Rd. Many intersections will remain at the lowest Level of Service which is F. There is also concern about congestions building up in roads beyond the portals and this causing traffic to slow including in the tunnel.

The second sentence seems to assume rather than demonstrate that this objective is met by stating that diverse travel needs are 'best met by road infrastructure.'

Claims by Westconnex that the project will improve speed and reliability depend on the reliability of its approach to traffic modelling which experts argue are flawed (see bibliography in contribution on flaws in modelling (http://m4eis.org/2015/10/17/major-flaws-in-westconnex-eis-traffic-report/)).

Create opportunities for urban revitalisation, improved liveability, and public and active transport (walking and cycling) improvements along and around Parramatta Road

This is a reference to Urban Growth's plans for major redevelopment (http://www.urbangrowthnsw.com.au/work/urban-transformation-projects/parramatta-road-urban-transformation-program.aspx) including high rise buildings along Parramatta Rd. There is no doubt that some opportunities for cycling and walking will be retained or developed but many argue that the overall impact of the project will be to increase car dependency (http://m4eis.org/category/commentaries-

objections/page/2/) which will have negative health impacts. The project could improve liveability for some but serious downgrade liveability for many thousands of others. The question is: are there alternative ways of achieving liveability goals without the destructive impacts of this project?

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

This is a reference to faster travel times that should enhance the productivity and attractiveness for businesses along the Westconnex route. It also relies on traffic modelling predictions being accurate. Modelling has failed for some past projects leading to business failure. It's also not clear exactly what this is referring to and in the absence of a transparent business case, it's not possible to evaluate the positive impact of land uses.

Enhance movements across the Parramatta Road corridor which are currently restricted

It's hard to see how this objective will be achieved when there will be more traffic on some sections of Parramatta Rd (http://m4eis.org/2015/10/15/eis-admits-deterioration-in-parramatta-road-traffic-after-m4-east/) than there is now. Some intersections across Parramatta Rd west of Homebush will also be slower according to the M4 Widening EIS. Traffic flow might flow more easily in the M4 tunnel but some argue that it will hit congested spots not long after it emerges from the tunnel. Past experience would suggest that this congestion could bank up in tunnels. Also by 2031, the tunnels will reach full capacity.

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

It is simply not possible to assess this objective because there is no public business case. Billions of dollars of public money are being paid to private companies.The public not the private sector carry the risk on this project. Currently, banks are being recruited to offer loans that will be repaid over many years by the toll paying public. News that the Westconnex Delivery Authority functions have been transferred to a private (but publicly owned) corporation, the Sydney Motorway Corporation (http://www.smh.com.au/nsw/westconnex-shielded-from-scrutiny-after-control-handed-to-private-corporation-20151016-gkapzx.html) will only add to the lack of transparency around the project. The only business case that was ever produced was found by the NSW Auditor General to be inadequate (http://www.smh.com.au/nsw/damning-report-into-westconnex-motorway-released-by-nsw-auditorgeneral-20141218-129r7t.html). Currently we do know that the Westconnex will absorb billions of Federal and State funds that could be spent on alternative projects.

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

This is a reference to tolls. Some commuters who chose to use the Westconnex M4 to travel to and from the Sydney airport would spend hundreds of dollars a week on tolls (http://www.mehreenfaruqi.org.au/westconnextolls/). While some agree with a user pays approach to roads, other argue that tolls shouldn't be applied unless there is affordable public transport alternatives or alternative free viable routes.

Integrate with the preceding and proposed future stages of WestConnex, without creating significant impacts on the surrounding environment or duplicating any potential issues across the construction periods

This is very hard to accept given the 3 year long construction period for the M4 tunnel and the 24/7 construction plan. Even the EIS acknowledges there are significant impacts in relation to noise, loss of housing and destruction of heritage. Already on the M4 widening, there are issues with asbestos waste (https://newmatilda.com/2015/10/02/westconnexs-asbestos-problem/) while at Beverly Hills noise walls have been stripped away from the M5 and will stay down for about 4 more months than originally predicted.

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, would be demolished. Communities are being decimated. It is hard to see that overall, this objective to protect natural and cultural resources is being met.

How does the EIS say Westconnex will achieve these objectives?

(People's EIS comments are in italics.)

Once completed, the project would provide immediate operational benefits along the M4 and Parramatta Road, including a reduction in travel times and improvements in the level of road safety.

- Whether the predicted improved travel times of 6-8 minutes by 2021 (http://m4eis.org/2015/10/15/eis-admits-deterioration-in-parramatta-road-traffic-after-m4-east/) is worth the additional traffic congestion on Parramatta Rd from Parramatta Rd to Homebush and the Inner West is up to you. Traffic is predicted to flow more smoothly on Parramatta Road between Homebush and Haberfield but even that depends on traffic modelling that some argue could be flawed.*

The project is being developed as part of the first stage of WestConnex which also includes the M4 Widening project. Completion of both projects would provide a full motorway connection between the Blue Mountains in the west and Haberfield in the east. Future stages of WestConnex would link the project with Sydney's south-west, as well as integral freight centres at Sydney Airport and the Port Botany precinct.

As such, the project would support NSW's key economic generators and provide a strategic response to currently inadequate and highly congested transport routes. Critically, this includes providing the missing link in the motorway network which supports Sydney's global economic corridor.

This statement is a little confusing because what is known as Sydney's 'global economic corridor' runs from Ryde, Macquarie Park towards the CBD and Sydney airport. In any case, even if the chosen M4 route was the global economic corridor, this objective suggests that entrenching development towards Sydney's CBD, which is on its eastern edge, 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 decentralisation with an emphasis on enhancing the centres of Liverpool and Parramatta which are nearer the geographic centre of the city.

Integrated land use and transport planning initiatives are key factors in developing a future in which Sydney's growing population can reliably access jobs and services. To fulfil this need, the integrated package of transport improvements delivered by WestConnex would include complementary enhancements to the existing road network, a redesign of bus services and facilities, improved access to rail stations, and upgrades to cyclist and pedestrian facilities.

The public needs to be wary of phrases like "complementary enhancements" as it is not clear who is responsible for these or if they will happen. Indeed, you cannot assume they are 'enhancements' at all, given that AECOM, the authors of EIS, have long been promoting the positives of the controversial Westconnex while at the same time being paid with public funds to investigate the environmental impacts of the project.

There is a reference to improved bus services but bus lanes promised on Parramatta Rd are only options being considered by Transport NSW. Some bus routes across Parramatta Rd running N and S are predicted in the M4 widening to take longer after the completion of works.

The project complements a number of other transport and freight-based infrastructure initiatives identified in the Transport Master Plan. Ultimately, it is the combination of these initiatives that will best address Sydney's needs.

If this is true, the question becomes what are these? are the initiatives being done in the right order and how will then mitigate the negative impacts including traffic congestions generated by the Westconnex.

To protect natural and cultural resources and enhance the environment, design, construction and operation of the project would be undertaken in accordance with environmental management commitments identified in this environmental impact statement (EIS), as well as any additional measures identified in conditions of approval for the project.

This promise covers many things. The EIS defers consideration of mitigation of many impacts off to the post approval 'conditions of approval' phase. It is not clear what access the public has to monitoring these. Residents would do well to take advice on this issue from residents dealing with noise impacts at Beverly Hills where Westconnex has begun the King Georges Interchange project and to Granville residents dealing with asbestos issues on the M4 widening project. At St Peters residents are having continual problems with safety breaches such as a contractor not washing wheels when carting contaminated waste from the Alexandria Landfill site. A resident at Haberfield has also written a strong submission about concerns about construction and operational impacts (http://m4eis.org/2015/10/06/a-response-to-westconnex-m4-east-proposal-an-objection-from-a-haberfield-resident/), concerns shared by the Mayor of Ashfield Lucille McKenna (http://m4eis.org/2015/10/07/ashfield-mayor-lucille-mckenna-m4e-proposal-totally-unacceptable/). There are also concerns about cracking by underground Northconnex tunnelling (http://www.dailytelegraph.com.au/newslocal/the-hills/vibrations-from-northconnex-works-like-an-earthquake/story-fngr8i1f-1227558401617).

Conclusion

There are a huge number of questions hanging over the Westconnex project. Evidence is mounting that Westconnex would not meet its objectives and so should not be approved. The biggest concern that many residents, business owners, workers, planners and commuters have is that there will be no independent scrutiny by the NSW Planning Department of Westconnex's claims. The People's EIS is one small way of opening up the process to scrutiny and providing alternative ideas for consideration. We welcome contributions. Make sure the Planning Department knows about your concerns in one or more submissions. Submissions online can be made on the Department of Planning website http://majorprojects.planning.nsw.gov.au (http://majorprojects.planning.nsw.gov.au) or sent to:
SSI 6307
NSW Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

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A People's M4 EIS

Major flaws in Westconnex EIS Traffic report

17/10/201525/10/2015 wendybaconblog Commentaries & Objections "Black Box" model, AECOM, City of Sydney, Cross City Tunnel, Induced traffic, Lane Cove Tunnel, Peak car, public transport, SGS consulting Westconnex report, traffic modelling

(Ed: These comments about Westconnex Traffic Modelling are relevant to the Westconnex M4 EIS traffic chapter that is already published on the People's EIS (http://m4eis.org/2015/09/27/traffic-and-transport-westconnex-m4-east-environmental-impact-statement/).Traffic modelling can be daunting but we hope that this contribution, along with other contributions on traffic, can help you prepare your own submission.)

By Anthony McCosker*

Traffic Modelling Flaws

Chapter 8 Traffic and transport (http://m4eis.org/2015/09/27/traffic-and-transport-westconnex-m4-east-environmental-impact-statement/) and the associated appendix (Appendix G (http://m4eis.org/category/table-of-contents/traffic-transport/)) are based on traffic modelling based on a three-stage system (see Appendix G, pp. 4-2 to 4-15):

(1) traffic demand management;

(2) rebase future year traffic demand; and

(3) operational traffic modelling.

This summary examines the limitations of relying solely on traffic modelling findings, before assessing the assumptions made by WestConnex traffic modelling, examining a parallel report completed by SGS and concluding with a brief case of other traffic modelling for similar projects.

Limitations of traffic modelling

Traffic Modelling has many limitations and therefore it is dangerous to rely solely on its findings.

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 used in the modelling means that the figures produced are just one possible outcome of many.

So to rely solely on these findings can lead to misguided conclusions or outcomes, adding unnecessary risk to a project (Evans, Burke, & Dodson, 2007). This can be seen in recent Australian examples such as AECOM facing litigation over the traffic modelling of the CLEM7 tunnel in Brisbane, litigation over the traffic modelling for the Lane Cove Tunnel, and the Cross City Tunnel struggling to reach 20,000 cars per day after modelling suggested that 90,000 cars a day would use it (see http://www.smh.com.au/federal-politics/political-opinion/the-forecast-was-not-good–or-even-accurate-20120929-26rzb.html (http://www.smh.com.au/federal-politics/political-opinion/the-forecast-was-not-good–or-even-accurate-20120929-26rzb.html)).

Indeed a reliance on traffic modelling as a justification for projects (as commonly happens in Australia) has seen '…investments in Melbourne's urban road network [result] in **more time being used by Melbourne's motorists rather than less time'** (Odgers, n.d., pp. 14-15), finding that from 2000-1 to 2006-7 overall speeds per hour on Melbourne freeways stayed generally the same, at around 78km/hour. Thus it is important to consider that 'Transport models are useful planning tools, but travel demand forecasting is not a precise science, and there are numerous outside factors which are difficult to predict or quantify' SGS (2015). Professor Michiel Bliemer and Dr Matthew Beck (both from the University of Sydney's Institute of Transport and Logistics) (Bliemer & Beck, 2015) state that models do not factor in future trends, preferences or behaviour (even trends that are known to be happening, such as 'millennials' driving less).

Some limitations of traffic modelling

Traffic modelling overlooks future trends

Because 'a linear relationship is assumed between population, concentrations of land use and long-term transport demand' (Evans et al., 2007, p. 6), traffic modelling fails to consider future trends including (but not limited to):

- Changes in fuel prices and shortage (or perceived shortage) of fuel ('Most technical

assessments of transport systems are naïve to the issue of petroleum risk' (Evans et al., 2007)):

- Changes in government policy (including transport and planning policy)
- The effect that emerging transport trends including decentralised and disruptive transport provision (such as Uber), car share (eg GoGet) and autonomous vehicles will have on car use
- Changes in generational travel preferences (such as 'Millennials' preferring technological connections over private vehicle connections; 'Boomers' driving less as this cohort ages)
- Changes in sociocultural trends (such as preference for particular destination types or avoidance of areas due to issues such as crime)

Traffic modelling inadequately address effects of 'induced traffic'

Traffic models also struggle to accurately address induced traffic, which 'weakens their capacity to inform policy makers about the broader economic value and environmental impact of major transport projects' (Evans et al., 2007, p. 6). Induced traffic can include:

- Mode change (such as switching from public transport to car use due to reduced travel time upon immediate opening of the road, known as the Downs-Thompson Paradox—see for example http://io9.com/how-the-downs-thomson-paradox-will-ruin-your-commute-1152573927 (http://io9.com/how-the-downs-thomson-paradox-will-ruin-your-commute-1152573927))
- New trip
- Change of route
- Shift of times at which people travel
- As travel times are initially shortened by increased road capacity, people have more time in their travel budget (generally around one hour—see the Marchetti Constant for more on this) so may choose to make longer trips
- Changes in land use due to changes in accessibility to transport modes
- Reduced public transport services further increasing automobility of a city

'The biggest force still driving the Auto City to build large freeways and accommodate the automobile rather than providing other options is the standard "black box" transportation/land use model…These are based on how a new or widened road will save time, reduce fuel, and lower emissions and road accidents…these benefits are illusory due primarily to "induced traffic."' (Newman & Kenworthy, 1999)

Traffic modelling oversimplifies trip types

Travel is ‘grossly simplified’ with minimal trip types considered (Evans et al., 2007, p. 4), for instance ‘trip-chaining’ (combining a number of destinations in one journey, such as dropping children at school before going to work, then picking the child up and going shopping) is ignored in modelling due to its complexity

Traffic modelling oversimplifies or limits considerations that lead people to choose trip or mode types

Residential density, land use mix and non-motorised accessibility all influence travel behaviour but are rarely accounted for (list adapted from Evans et al., 2007):

- ‘Australian metropolitan strategies…generally seek to reduce land use separation and distance, to promote walking, cycling, and public transport, and to reduce the use of the private motor vehicles. The use of models is unable to assess land use/transport interactions in order to determine and prioritise transport project investments within these strategies is therefore questionable.
- Trip zones considered are generally large, limiting consideration of walking or cycling
- Modal assignment is limited and overlooks many qualitative considerations of public transport services (such as youth preference to engage technology while travelling)
- Limited consideration of non-motorised trips and other travel options (such as carpooling)
- There is a focus on interchange and waiting times over quality of nodes or destinations (which affects the modes of transport people will take)

Traffic modelling focusses predominantly on travel times at the expense of other considerations

Models give limited consideration to effects such as pollution, noise or carbon emissions, while route/traffic assignment (Evans et al., 2007) assigns traffic flows to an equilibrium where no traveller can switch routes and reduce their costs which is not how the ‘real world’ works; capacities are generally over-simplified (for example heavy vehicle movements and highway geometry are often overlooked).

Traffic modelling is generally ‘expert’-led and ‘technocentric’, with little community input or justification of assumptions and inputs

Due to their technical nature,'knowledge of how the models work and their capacities, and in turn their biases and inadequacies, is often restricted to a small number of professional experts' (Evans et al., 2007, p. 2). **This can give traffic modelling reports the impression of 'objectivity' and 'universality', whereas the policy context and the political surroundings certainly play a role in the assumptions and inputs into such models, and when this is added to 'the inherent inadequacies of transport modelling, this technical complexity may be seen to create a form of institutional risk for transport planning assessment'** (Evans et al., 2007, p. 2).

Traffic modelling generally favours one mode—the car (Evans et al., 2007)

M4 East traffic modelling—what are the assumptions?

'Do nothing' baseline is assumed

A 'Do nothing' approach is used as the baseline for any time-saving benefits of the M4 East and wider WestConnex project, however a more viable comparison might have been an incremental improvement of multiple modes of transport infrastructure (including for cars, buses, trains, light rail, walking and cycling) using the funding amounts for the M4 East and wides WestConnex project ($15.4 billion). This could present an opportunity for increased viability of the traffic modelling, as previous suggestions by independent experts (see http://www.reportageonline.com/2014/06/westconnex-motorway-not-actually-going-to-help-sydneys-traffic-congestion/ (http://www.reportageonline.com/2014/06/westconnex-motorway-not-actually-going-to-help-sydneys-traffic-congestion/)) for sustainable public transport as an alternative have been 'overruled by WestConnex', and the speed of a city's roads are directly related to the speed of its public transport (known as the 'Mogridge Conjecture').

An auto-dependent study area is assumed

The study area—defined as the Local Government Areas in the project—is assumed in the report to be auto-dependent and reliant predominantly on cars for transport. However Newman and Kenworthy (2015) outline the fact that a suitable aspirational target for total trips taken by car might be 75% in an 'automobile fabric' area. Table 5.7 (Appendix G, p. 5-8) however shows that the average weekday travel for all local government areas within the project area is 57%, far lower than both the Greater Metropolitan Area of Sydney (67%) and the threshold for Newman and Kenworthy's 'automobile fabric'. It is a figure that is closer to a 'transit fabric' of 50% overall car use (see also Figure 5.4 from Appendix G, below). Along with

the fact that 90% of western Sydney commuters to the CBD travel every day by public transport (SGS, 2015), this brings into question the modelling assumptions that cars are the preferred form of transport and that they will remain so to the modelling horizon (2031).

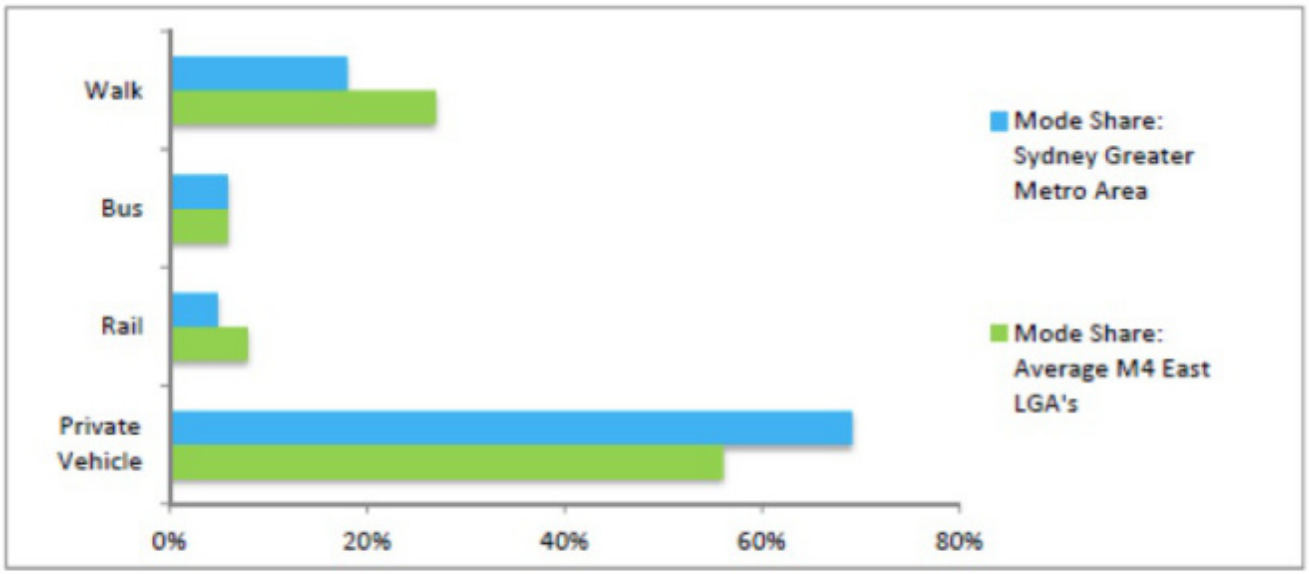

Figure 5.4 **Travel mode share comparison between study area average and Sydney GMA (Source: NSW Bureau of Transport Statistics, Household Travel Survey Report: Sydney 2012/13, November 2014 release)**

(https://m4eis.files.wordpress.com/2015/10/pt-tiff.jpg)

(Appendix G (p. 5-8) itself states: 'Findings from the HTS [household travel surveys] shows that on average, 57 per cent of trips on a typical weekday in the project area are car based compared to 69 per cent in the Sydney GMA. The lower proportion of residents who are dependent on car travel can be partly attributed to good public transport options in the project area and also to the proximity of activities with a high proportion of travel utilising the walk mode share in comparison to LGAs with a more dispersed land use.')

Current trends such as 'peak car' are ignored; outdated status quo is assumed

As outlined above, traffic models struggle to deal with future trends and patterns. However even current trends such as peak car (Newman & Kenworthy, 2015), which began in 2004 and is the decrease in the growth in overall car use, are ignored in the modelling. Ignoring trends towards peak car and shifts away from automobile dependence, as well as societal changes (such as an ageing population in Sydney and reduced reliance on cars by younger generations) and potential future technological developments (such as car share systems and autonomous vehicles), adds risk to the modelling assumptions and significantly reduces their reliability.

A certain level (2-7%) of induced traffic is assumed

'At the extremes of the project a slight increase in volumes is shown on Parramatta Road, Concord Road and City West Link. This is indicative of the induced traffic demand attracted to the corridor as a result of the project…To the west, Concord Road and Parramatta Road continue to show an increase in expected daily volumes reflecting the induced demand resulting from the attraction to drivers of the WestConnex scheme.' (Appendix G, p. 8-2)

'Induced travel demand increases 2031 future year traffic volumes using WestConnex between two per cent and seven per cent, with the specific value varying across different sections of the project.' (Appendix G, p. 4-6)

Yet the uncertainty regarding the actual amount of induced traffic and its effects on project aims (such as 'Relieve road congestion' and 'Create opportunities for urban revitalisation… along Parramatta Road'), its impact on the local study area and its implications in the context of Greater Metropolitan Sydney area are not addressed.

The effect of induced traffic demand on public transport usage is not acknowledged

Despite claims that improved public transport (such as bus) travel times will improve patronage (Chapter 8, p. 32), the effects of induced traffic (such as switches away from public transport to cars) on alternative modes are ignored. Concerns regarding increasing the demand for automobile use when the majority of developed cities around the world and most strategic directions and plans for Sydney point towards reducing automobile demand are also overlooked.

SGS traffic modelling report is ignored

A traffic modelling report conducted by SGS Economics and Planning (SGS, 2015) relating to the entire WestConnex project produces numerous counterpoints to the modelling conducted for the M4 East project and given in the EIS. This report is ignored throughout the M4 East report, despite the opportunity to strengthen both models by comparing and contrasting outcomes, and identifying differences in assumptions that led to any disparities (some select findings from the report are outlined below).

Brief findings from the SGS traffic modelling report

As a counterpoint to the modelling used for the EIS, this section will briefly outline the main points made by the SGS report that was conducted into the wider WestConnex project (available at http://www.sydney.org.au/sgs-economics-and-planning-westconnex-transport-modelling-summary-report/ (http://www.sydney.org.au/sgs-economics-and-planning-westconnex-transport-modelling-summary-report/)).

At best the disparity in the two projections proves the difficulty in accurately predicting future transport movements across a complex network in a city such as Sydney and confirms the above points warning against sole reliance on traffic modelling for project justification. At worst they present a bleak view of the effectiveness the WestConnex project will have, and bring the validity of the modelling used and thus the justification for the entire project into question. Briefly, the SGS report found that:

'Sydney traffic congestion will worsen with or without WestConnex, with the project only making a minor difference to Sydney's overall traffic in the future…The net effect [of the entire WestConnex project] is similar to the status quo.' (SGS, 2015, p. 1) (see below)

A map showing which areas stand to win (green circles) and lose (red) according to the City of Sydney.

(https://m4eis.files.wordpress.com/2015/10/sgs-graphic.jpg)

(see http://www.smh.com.au/nsw/parramatta-road-traffic-will-increase-under-westconnex-study-shows-20150427-1mueqm.html (http://www.smh.com.au/nsw/parramatta-road-traffic-will-increase-under-westconnex-study-shows-20150427-1mueqm.html))

'The [SGS] modelling confirms that WestConnex will not improve access to the Sydney CBD… the CBD is already congested and has little available parking.' (SGS, 2015, p. 4)
'Traffic flows on Parramatta Road will increase by up to 22 per cent (between Homebush Bay Drive and Concord Road) as vehicles avoid paying the toll on the M4 and M4 eastern extension. This finding is consistent with the WestConnex Delivery Authority's own assessment presented in the M4 Widening Environmental Impact Statement and with the traffic flow impacts observed when the M4 toll was removed in 2010. As a result of WestConnex, Parramatta Road will take more traffic in the future, not less.' (SGS, 2015, p. 15)

'Traffic growth on Parramatta Road will clearly jeopardise the government's planned urban renewal and population growth along this corridor.' (SGS, 2015, p. 4)

Issues with modelling of other comparable projects

In recent years, traffic modelling of other similar projects has been called into question on a number of occasions, and serves as a warning against relying solely on traffic modelling as justification for road projects into the future. For instance:

- The Cross City Tunnel (Sydney) became insolvent in 2006 as a result of significant traffic modelling discrepancies—90,000 cars/day were predicted through the model, though just over 20,000 cars/day actually used the tunnel (see http://www.smh.com.au/federal-politics/political-opinion/the-forecast-was-not-good–or-even-accurate-20120929-26rzb.html (http://www.smh.com.au/federal-politics/political-opinion/the-forecast-was-not-good–or-even-accurate-20120929-26rzb.html))

- The two companies responsible for the Lane Cove Tunnel (Sydney) traffic modelling were subject to litigation after the tunnel became bankrupt directly following its 2009 completion due to actual use less than half that projected in the modelling (see http://www.smh.com.au/nsw/trial-to-start-on-144-million-lane-cove-tunnel-debacle-20140809-102c6d.html (http://www.smh.com.au/nsw/trial-to-start-on-144-million-lane-cove-tunnel-debacle-20140809-102c6d.html))

- AECOM (who conducted the M4-East traffic modelling) faced litigation over the modelling of the Clem7 tolled tunnel in Brisbane. Central to the claim was the fact that AECOM provided traffic models showing 100,000+ cars/day usage by 2011, despite having 18 months earlier estimated usage would be 57,000 cars/day. Actual traffic usage numbers in 2011 were under 24,000 cars/day (see http://www.smh.com.au/business/backers-sue-on-tollroad-forecast-use-20110414-1dfxd.html (http://www.smh.com.au/business/backers-sue-on-tollroad-forecast-use-20110414-1dfxd.html)).

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- Anthony McCosker is doing his doctorate at the Curtin University Sustainability Policy (CUSP) Institute

2 thoughts on "**Major flaws in Westconnex EIS Traffic report**"

1. **emendia** says:
   19/10/2015 at 11:23 am Edit

   Great summary of the issues with a transport modelling framework designed to justify increasing road capacity.
   Though my understanding of the Downs-Thompson Paradox is that the mode shift from public transport to cars results in reduced public transport patronage and therefore frequency, which in turn encourages further mode shift.

   Reply (http://m4eis.org/2015/10/17/major-flaws-in-westconnex-eis-traffic-report/?replytocom=152#respond)
2. **emendia** says:
   19/10/2015 at 11:32 am Edit

   The other component of induced demand overlooked in transport models is changes in residential/work location choice. New/expanded freeways encourage people to move further from work, knowing that they can do so and still keep their daily commute time withing their travel budget.

   The resulting sprawl has huge economic, environmental and social costs which are not included in a business case or EIS.
   The cumulative impact of urban-motorway induced sprawl over the last half century is that Australian cities now spend 13% of GDP on transport, compared to only 8% in European cities.

   Reply (http://m4eis.org/2015/10/17/major-flaws-in-westconnex-eis-traffic-report/?replytocom=153#respond)

Blog at WordPress.com (https://wordpress.com/?ref=footer_blog). The Big Brother Theme (https://wordpress.com/themes/big-brother/).

A People's M4 EIS

Chris Standen's Submission to Westconnex M4 East EIS : 49 issues with Traffic and Transport assessment

01/11/201502/11/2015 wendybaconblog Commentaries & Objections Chris Standen, Downs-Thomson Paradox, Freight, Parramatta Rd., tolls, Traffic and Transport Assessment, Travel Times Savings, VKT, Walking Cycling

(Ed: This submission is by transport planner Chris Standen, who is currently completing a doctorate in transport economics at the University of Sydney. For more on Chris, see below. Readers will note that Chris has many questions for the M4 East Traffic Modellers. The People's EIS are keen to hear the answers. We note that Chris Standen's submission to EIS may have been slightly updated before it was finally submitted and we will publish the final version later)

1.Summary

1) I strongly object to the M4 East project, and to the broader WestConnex scheme.

2) The EIS has failed to model the impacts of implementing the proposed project (M4 East) relative to not implementing the proposed project (the 'future do minimum' scenario). The 'future do something' scenarios, on which the traffic, air quality, health and greenhouse modelling is based, include the M4 East project plus another uncommitted project to convert kerbside general traffic lanes on Parramatta Road to bus priority. With these additional bus lanes, the capacity of Parramatta Road would be significantly reduced and traffic volumes would fall accordingly, with drivers opting to use the M4 East tunnel instead. As such, the traffic volumes for the M4 East tunnel have been dramatically overestimated, and the traffic volumes for Parramatta Road have been dramatically underestimated in the 'future do something' scenarios.
The impacts of the project as proposed by the proponent (and as defined in Section 5 of the EIS), that is, **the M4 East Tunnel with no new priority bus lanes on Parramatta Road, has not been presented in the EIS, as required by the SEARs.**

(3) The stated objectives for the project were contrived to fit the project after it had already been announced. In a democratic strategic planning process, objectives are set first based on the needs and desires of the community, and then alternative projects/policies are appraised against their ability to meet those objectives.

(4) The EIS has not modelled alternative policy scenarios that could meet the transport/accessibility needs of NSW's growing population, e.g.
a) Greater investment in public transport;
b) Road pricing reform;
c) Land use planning that places more homes closer to employment and services.

(5) It is no secret that the real purpose of the WestConnex scheme is to increase the road freight accessibility of Port Botany and Sydney Airport, and that private passenger vehicles have been included as a means of paying for it (through tolls). However, there are various policy alternatives for dealing with the growing freight task that do not appear to have been considered, e.g.:

a) Increase the capacity and reliability of rail freight
b) Increase rail freight subsidies to match/surpass those of road freight.
c) Divert container operations to other ports outside the city centre. Very few cities concentrate container operations in the city centre where road access is costly and has significant impacts on highly populated areas.

(6) The M4 East will be used by less than 1% of the NSW population each day. The costs will be borne by the whole population. It can hardly be argued that it is providing for the "greater good".

(7) The Traffic and Transport Assessment does not stand up to scrutiny. There is not enough information about the methodology, input data or assumptions for the forecasts to be independently verified.

(8) There is no sensitivity analysis in the Traffic and Transport Assessment. The effects of varying key assumptions (e.g., willingness to pay the M4 East toll) have not been disclosed.

(9) The Traffic and Transport Assessment has not modelled the travel time and accessibility impacts for non-motorised modes (walk and bicycle).

(10) The issue of induced demand has not been fully addressed in the Traffic and Transport Assessment.

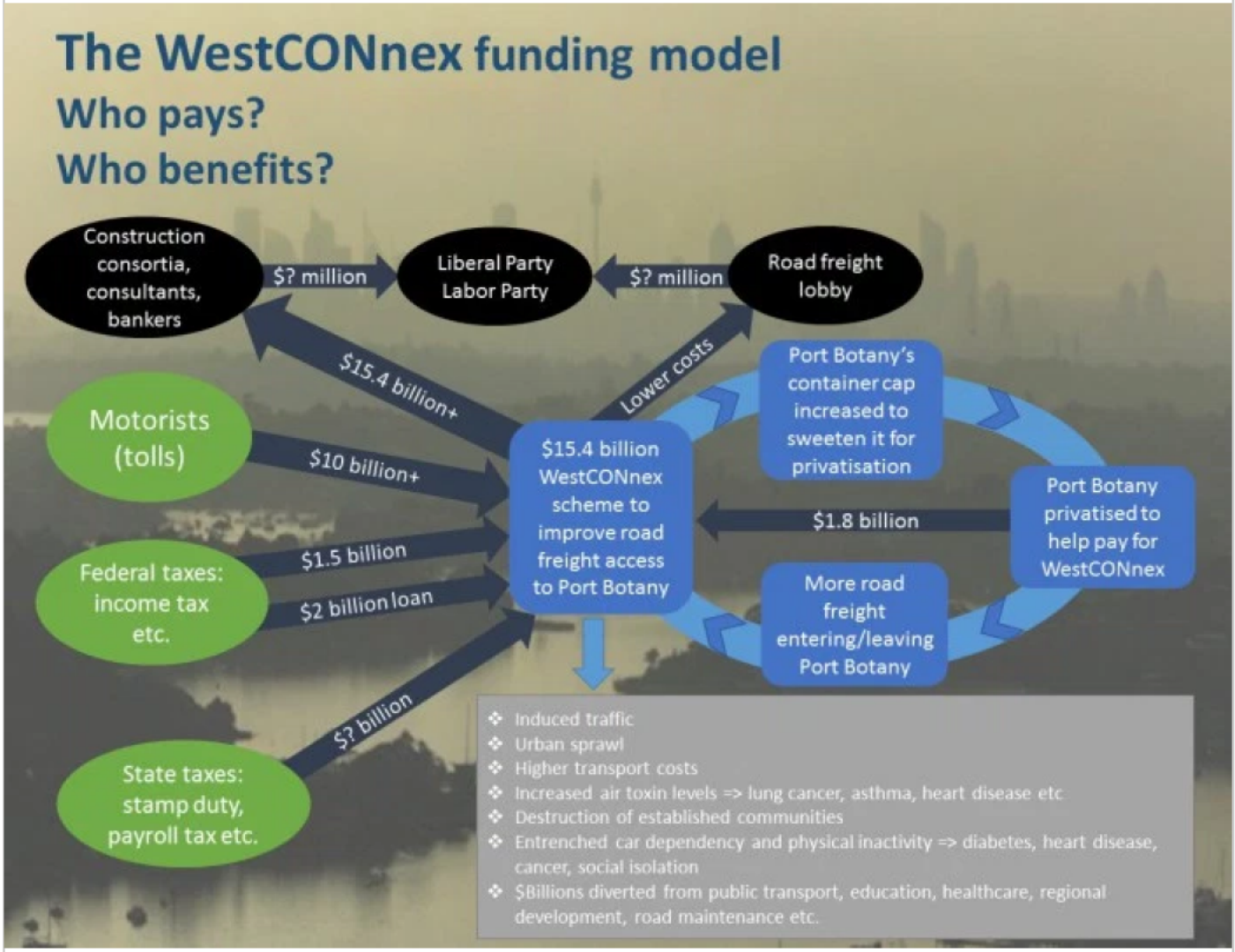
(11) Given the seriously flawed Traffic and Transport Assessment, there can be no confidence in the accuracy of the other impact analyses in the EIS that are dependent on the traffic forecasts, in particular:

a) Air quality,
b) Noise and vibration,
c) Human health,
d) Greenhouse gas emissions.

(12) The role of motorways in a multimodal urban transport network is to allow traffic to circulate around the edge of a city connecting low density suburbs, where the traffic does not directly impact highly populated areas. For radial transport into and out of employment/activity centres, mass transit (e.g., rail) is more quick/efficient, requires less space, and has fewer impacts on highly populated inner-urban areas.

(13) The EIS does not consider the cumulative costs of adding more urban motorways to those previously built through the heart of Sydney since the 1950s. Although the economic, social and environmental costs of each individual motorway (as reported in an EIS) may be considered by some stakeholders to be acceptable, the cumulative costs are considerable:
(a) Following decades of road expansion and consequential sprawl, Sydney now spends about 13% of its GDP on transport, while the average European or Asian city spends only between 5% and 8%.1 (1)
(b) Serious human health impacts due to petrochemical vehicle emissions/smog, including:
i) Lung cancer,
ii) Asthma,
iii) Heart disease,
iv) Impaired lung development in children living near motorways/exhaust stacks.

(c) Waterways contaminated with road runoff (heavy metals and carcinogens in brake and clutch dust, exhaust particulates etc.).
(d) High traffic crash costs (of deaths/traumatic injuries and material damage).
(e) Urban sprawl and increasing commuting distances.
(f) Social isolation for non-drivers living in car-dependent suburbs.
(g) Noise pollution from traffic and its impacts on sleep.
(h) Impacts on visual amenity (pollution stacks, concrete interchanges, concrete flyovers).
(i) Extreme summer temperatures (urban heat island effect).
(j) Community destruction and severance.
(k) Destruction of heritage.
(l) Less incidental physical activity from walking and cycling (including to/from public transport), resulting in higher rates of obesity, diabetes, cancer and heart disease.
(m) Increased chauffeuring burdens for parents and carers.n)
(n) Less independence for children.
(o) High per-capita greenhouse gas emissions.



(https://m4eis.files.wordpress.com/2015/11/wcfundingmodel5-11.jpg)

Designed by Chris Standen

2 Issues with the Traffic and Transport Assessment (Appendix G)

2.1 General Comments

(14) The Traffic and Transport Assessment does not stand up to scrutiny. There is not enough information about the methodology, input data or assumptions for the forecasts to be independently verified.

(15) There is no sensitivity analysis in the Traffic and Transport Assessment. The effects of varying key assumptions (e.g., willingness to pay the M4 East toll) have not been disclosed.

**(16) Travel time and accessibility impacts for non-motorised modes (walk and bicycle) have not been modelled.

(17) Impacts of disruptive technology on future driving demand have not been not considered (e.g.automated vehicles).

(18) Inter-generational changes in vehicle ownership, driver licensing and transport preferences have not been considered.

(19) Changes in aggregate transport measures have not been provided for the various scenarios.For example:

(a) Overall increase in VKT (Vehicle Kilometres Traveeled.)
(b) Change in average trip distance.

2.2 Comments on Specific Sections

2.2.1

(20 One of the stated purposes of the report is to "complete a holistic traffic and transport assessment including crash analysis, travel speeds and travel time analysis and opportunities to enhance public and active transport networks within the project area". However, the report does not provide any travel time forecasts for active transport.

(21) Another purpose is to "Recommend a suite of measures to mitigate and manage traffic and transport impacts of the project for construction and operational scenarios". The general consensus among transport experts is that the most effective way to manage traffic demand is through demand management, e.g., road pricing reform. However, the report does not recommend any demand measurement measures.

2.2.2 Section 3 – Strategic Context

(22) The stated justification for the project is based on the discredited 'predict and provide' approach to transport planning, whereby it is assumed that transport demand will continue to grow, and that capacity must be increased to accommodate it. In practice, transport demand in cities is limited by capacity: as capacity increases, so does demand (induced demand). It is geometrically impossible to provide enough roadway capacity to accommodate all the latent demand for driving (i.e., where everyone can live and work where they want, and make all the driving trips they want, when they want, to wherever they want in free-flow traffic) in a city of Sydney's population.

(23) Furthermore, the most efficient way to accommodate the transport and accessibility needs of a growing population is through mass transit and better land use-transport integration. Urban motorways are a very inefficient way of moving people around. A single traffic lane can transport a maximum of only 2000 people per hour (in ideal conditions); a single railway line can transport 20,000 people per hour.

(24) The statement "It is acknowledged that any investment in motorway infrastructure has to be aligned with supporting public and active transport initiatives to achieve an increase in capacity, while aiming to reduce the reliance and demand of private vehicles on the future road network" is contradictory: increasing motorway capacity will only serve to increase private vehicle demand.

2.2.3 Section 4:Assessment Methodology

(25) There is not enough information about the modelling methodology for it to be replicated and the outputs independently verified.

(26) The transport model (WRTM) has not been made available for independent verification.

(27) The model input data and assumptions have not been made available for independent verification.
What toll prices have been assumed?

(28) The model coverage area is too small to capture all the transport impacts of the project. The project will affect transport demand and behaviour across the whole metropolitan area.

(29) More detail on the Value of Travel Time Saving (VTTS)/Willingness to Pay (WTP) model is needed.
(a) The form and parameters of the model have not been given.
(b) If it was based on stated preference surveys, then how has the issue of hypothetical bias been addressed?
(c) Has the model been validated? Previous toll choice models in Australia have overestimated WTP for toll roads.
(d) Does it include the negative utility of the tunnel environment (monotony, no natural light, poor air quality)?

(30) The weekend period has not been modelled, despite current weekend traffic volumes being higher than weekday traffic volumes on many corridors.

(31) Insufficient information about the travel zone structure in the WRTM:
(a) What are the travel zones based on? How big are they?
(b) How are intra-zonal trips modelled?
(c) How are trips to/from external zones modelled?

(32) Induced demand has not been fully addressed:

a) The model ignores the impact of the project on the long-term transport decisions of individuals and firms, including:
(1) Residential location choice – the project will encourage more people to move further from work (sprawl), thereby increasing average travel distances/demand.
(2) Work location choice – the project will encourage more people to work further from home, thereby increasing average travel distances/demand.
(3) Car ownership choice – the project will encourage more car ownership.

(4) Firm location choice – the project will encourage firms to locate in locations further away from their labour supply/customers/suppliers than they otherwise would, thereby increasing travel distances/demand.

(b) To my knowledge, there has been no long-term evaluation/verification of the methodology used to forecast induced demand (New Zealand Transport Agency Economic Evaluation Manual (EEM)). Induced demand by its nature materialises over several years, as people gradually move home/work location etc. Without a long-term evaluation/verification of the methodology, there can be no confidence in the induced demand forecast produced.

(33) Insufficient detail on origin-destination demand matrix generation:
(a) What are the form and parameters of the generalised cost function?
(b) How were shortest paths calculated?

(34) Insufficient detail on trip generation:
(a) What are the form and parameters of the trip production function, and how was it estimated?
(b) What are the form and parameters of the trip attraction function, and how was it estimated?
(c) Were trips were balanced towards attractions, or towards productions?

(35) Insufficient detail on trip distribution/modal split:

(a) What are the form and parameters of the gravity model used?
(b) What are the form and parameters of the deterrence function used?
(c) How has modal split been estimated?

36 Insufficient detail on road traffic assignment:

(a) Is assignment stochastic or deterministic?
(b) What link loading/flow function was used?
(c) Were intersection delays included?

(37) Insufficient detail on public transport assignment:

(a) How were access and egress points determined?
(b) How were route strategies determined?

(38) Non-motorised trips have not been included in the WRTM or LinSig modelling.
(39) Impacts on accessibility have not been modelled. Most transport is not an end in itself – it is a means to access work, education, services etc. How does the project affect population accessibility?

(40) Equity and equality impacts not described.

(a) How many people are better off with the project?
(b) How many people are worse off with the project?
(c) Do benefits/impacts accrue to any population groups more than others, e.g., people with a disability or on low incomes?

(41) Downs-Thomson Paradox not considered.

The project will attract passengers away from public transport to road. As such, public transport patronage will be lower than it would be without the project. This could result in public transport service levels being cut, which will encourage further mode shift from public transport to road.

(42) No sensitivity analysis.

Given the numerous assumptions and approximations in the model, there needs to be some sensitivity analysis, e.g.: How will traffic volumes be affected if (when) the WTP for the toll turns out to be higher than the point estimate used?

2.2.4 Section 7 Assessment of construction impacts

(43) Impacts on walking/bicycle demand and travel times have not been modelled.
(44) Does the LinSig intersection modelling take into account the impact that changes in intersection LOS will have on travel demand?

2.2.5 Section 8 Future year traffic volumes and patterns

(45) Impacts on walking/bicycle demand and travel times have not been modelled.
(46) Does the LinSig intersection modelling take into account the impact that changes in intersection LOS will have on travel demand?

2.2.6 Section 8 Future conditions without the project

(47) Impacts on walking and bicycle demand and travel times have not been modelled.
(48) Does the LinSig intersection modelling take into account the impact that changes in intersection LOS will have on travel demand?

2.2.7 Section 9 Assessment of operational impacts

**(49) Impacts on walking and bicycle demand and travel times have not been provided.

3 References

1. Newman P, Kenworthy J. Costs of automobile dependence: global survey of cities. Transp. Res. Rec. J. Transp. Res. Board 1999;1670(1):17-26. doi:10.3141/1670-04.

(From The Conversation website (https://theconversation.com/profiles/chris-standen-106596): Chris is currently researching for a PhD in transport economics at the University of Sydney. He holds a BSc in Physics from Brunel University, where his honours research was on subatomic particle measurement at the Stanford Linear Accelerator, and a Master of Environmental Management from UNSW. He has previously worked as a transport planner in local government, as a policy advisor in the NSW Parliament, and as a systems architect designing telecommunications networks for operators in Europe and Asia.)

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A People's M4 EIS

Transport economist explains poor project selection behind Westconnex : Kennedy Submission, Part One

29/10/201530/10/2015 wendybaconblog Commentaries & Objections business case, Gateway Review, Gratten Institute, Lyall Kennedy, Major Projects Assurance Framework, NSW Auditor's General's Performance Audit of Westconnex, Submission to Select Committee into the Abbott Government's Budget Cuts

(Ed: Transport economist Lyall Kennedy's submission will be published in several parts. It has already been sent to the NSW Department of Planning. This first part includes a focus on the NSW Auditor General's 2014 report on Westconnex that has never been properly responded to by the Baird government. As some referencing as been lost in this publication, full PDF will be published later on this site)

Introduction

My name is Lyall Kennedy. I am a Transport Economist with over 38 years experience in transport delivery and planning. I have held senior executive roles in the State Government and the private sector.

I am currently Director of Kennedy Consulting Pty Limited providing transport management and planning advice to the private and public sectors.

I also spent four years on Ashfield Council including as Mayor in 2011 and 2012.

I am very concerned that the WestConnex project has been ill conceived and the weaknesses of the proposal have been amplified through poor governance.

My submission largely focuses on transport issues. Whilst I don't cover other aspects of the EIS, I am concerned about other aspects particularly the impact on air quality and the loss of houses within the Haberfield Conservation Area.

A People's M4 EIS

Narrow interests plus public transport failure behind Westconnex M4 East – Lyall Kennedy Submission Part 2

29/10/201530/10/2015 wendybaconblog Commentaries & Objections 2031, Infrastructure NSW, M4 East, Max Moore-Wilton, Parramatta Rd., Sydney Airport, Time saving spin

(Ed: This is Part 2 of Transport Economist Lyall Kennedy's submission to the EIS. Kennedy is a transport economist and ex Mayor of Ashfield Council. Part One is here (http://m4eis.org/2015/10/29/transport-economist-explains-poor-project-selection-behind-westconnex-part-1-lyall-kennedy/))

What came first – WestConnex or the Strategic Plans

There is a requirement for the EIS that the proponent's proposal is consistent with all Sydney's strategic planning instruments. Requiring this project to be consistent with all strategic planning instruments sounds reasonable until you realise that **all the plans were rewritten in 2012/2013 to place WestConnex at the centre of their transport strategies**.

Up until 2012, metro strategy development in NSW was based on developing the broad strategy planning objectives and then discussing options to meet these strategic objectives before proposing individual projects/actions. Linking the M4 with the M5, as proposed by WestConnex, was never included as a project to realise previous Metropolitan Strategies.

Once WestConnex became the number one infrastructure project proposed by Infrastructure NSW, all strategic planning documents were rewritten to include WestConnex. In fact, it became the centrepiece of the transport strategy. This was after extensive community consultation was undertaken in February 2012 for the Long Term Transport Master Plan which did not include Westconnex.

At the time, Les Walinga, the then Director General of Transport, was on the Board of Infrastructure NSW and at the same time was developing the Long Term Transport Master Plan. When Infrastructure NSW proposed WestConnex as the major infrastructure project of its plan, **Les Walinga resigned from the Board citing conflict of interest as he was proposing public transport solutions in the Long Term Master Plan and was not supporting WestConnex**. Even within Infrastructure NSW there was doubt about the appropriateness of WestConnex.

Even allowing for the bastardisation of the planning process, this submission identifies areas where the **M4 East extension is inconsistent with the Metro Strategy**. These include:

- Does nothing to alleviate Western Sydney congestion
- Is an unsustainable solution as it will reach capacity by 2031
- Does not relieve traffic congestion on most downstream intersections

Who Benefits from the WestConnex Motorway?

Given that **WestConnex provides a direct link to Sydney Airport** but not to the city or Port Botany (which is eight kilometres from WestConnex) who is the big winner out of this project?

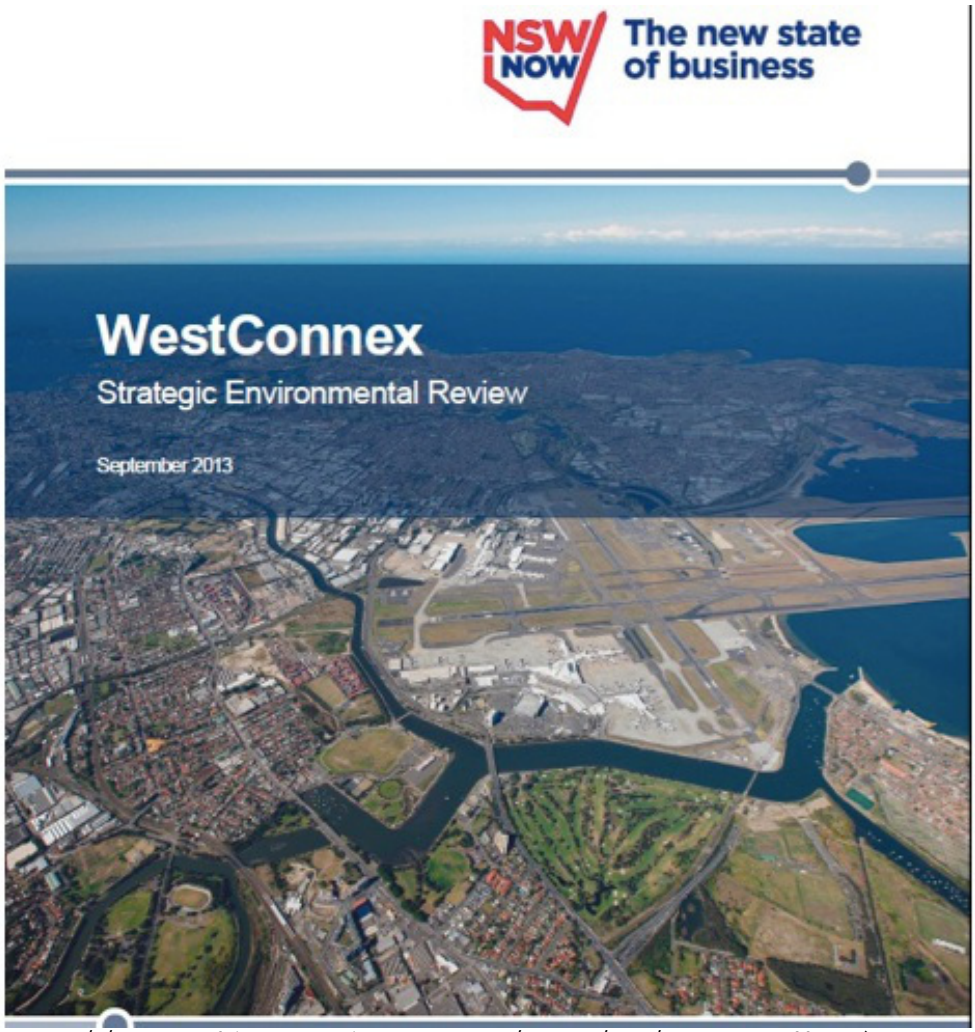
I would suggest that MAp Airports Limited the then owner of Sydney Airport (https://en.wikipedia.org/wiki/Sydney_Airport_Holdings) appears to be a major beneficiary. Since at least 2004, Sydney Airports has pushed in each of its Master Plans for improved links to the M4.

In 2011 the debate on a second Sydney airport was well advanced with the Federal Government considering a further proposal. If billions of taxpayers' money could be spent on improving road connections to the airport, this would cement Sydney Airport as the primary airport for Sydney for decades to come.

But how could an individual company influence the deliberations of Infrastructure NSW? One way may be to have the Chairman of Sydney Airport Holdings Max Moore-Wilton (http://www.infrastructure.nsw.gov.au/about-insw/our-board/max-moore-wilton-ac.aspx) as a Board member.

The only major attractor that is served by WestConnex is Sydney Airport. According to the WDA spin, among the benefits that WestConnex delivered included reducing the travel time from Parramatta to the airport by 40 minutes and bypassing up to 52 sets of traffic lights. They failed to say that you can now avoid the 52 traffic lights now in 2015 by catching the train which takes 45 minutes from Parramatta to the airport. According to google maps it takes between 39 and 54 minutes to drive between Parramatta and the airport. The claim of a 40 minute saving seems heroic.

The cover of the Strategic Environmental Review released by WDA in 2013 was a picture of the airport.



(https://m4eis.files.wordpress.com/2015/10/airporttiff.jpg)

Sydney has underinvested in public transport over the past 30 years

In 1998 the NSW government released Action for Transport 2010 an integrated transport plan for Sydney. The plan proposed to:

> "redress the [then] current imbalance in the road and public transport system."

(Action for Transport 2010 an integrated transport plan for Sydney, 1998, NSW Government p.2)

The plan included a 10 Point Action Plan for Sydney:

1. Getting the best out of the Sydney system
2. Improving Sydney's air quality
3. Reducing car dependency
4. Meeting the needs of our growing suburbs
5. Getting more people on public transport

6. Safeguarding our environment
7. Making space for cyclists and walkers
8. Preventing accidents and saving lives
9. Making freight more competitive
10. Giving the community value for money

(p. 3)

The plan listed (at page 5) 21 projects to be completed or started by 2010 these were:

Rapid Bus Only Transitways

1. Liverpool to Parramatta (2003)
2. Parramatta to Strathfield (2002)
3. St Marys to Penrith (Stage 1 2003) (Stage 2 2008)
4. Parramatta to Blacktown (2004)
5. Blacktown to Castle Hill (2009)
6. Blacktown to Wetherill Park (2006)
7. Parramatta to Mungerie Park (2010)

Heavy Rail

1. Airport Line (2000)
2. Bondi Beach Railway (2002)
3. Parramatta Rail Link to Epping and Chatswood (2006)
4. Hornsby to Newcastle High Speed Rail (Stage 1 to Warnervale 2007) (Stage 2 to Newcastle work to start by 2010)

North West Rail Link Epping to Castle Hill (2010)

1. North West Rail Link Epping to Castle Hill (2010)
2. Sutherland to Wollongong High Speed Rail (2010)
3. Hurstville to Strathfield Railway (To start by 2010 and be completed by 2014)
4. Liverpool Y Link (Work to start by 2010

Light Rail
16. To Lilyfield (2001)

Road Improvements
17. Eastern Distributor (2000)
18. M5 East (2002)
19. Cross City Tunnel (2004)
20. M2 to Gore Hill (2004)
21. Western Sydney Orbital (2007)

All the projects in bold were built. It can be seen from the list that every road project was delivered. Of the 16 public transport projects only four were completed.

The inability for successive governments to deliver public transport projects has made Sydney (particularly western Sydney) more car dependent. Building more roads has not had any lasting impact on road congestion. The traffic projections in the current M4 East EIS show the

tunnel at capacity by 2031.

> "2031 AM peak and PM peak operational performances (in comparison to the 'do minimum' results) are detailed in Table 10.7 and Table 10.8 respectively.
> High traffic densities are now recorded in the project's mainline tunnel east of Concord Road, particularly westbound during the AM peak and eastbound in the PM peak where capacity is reached."

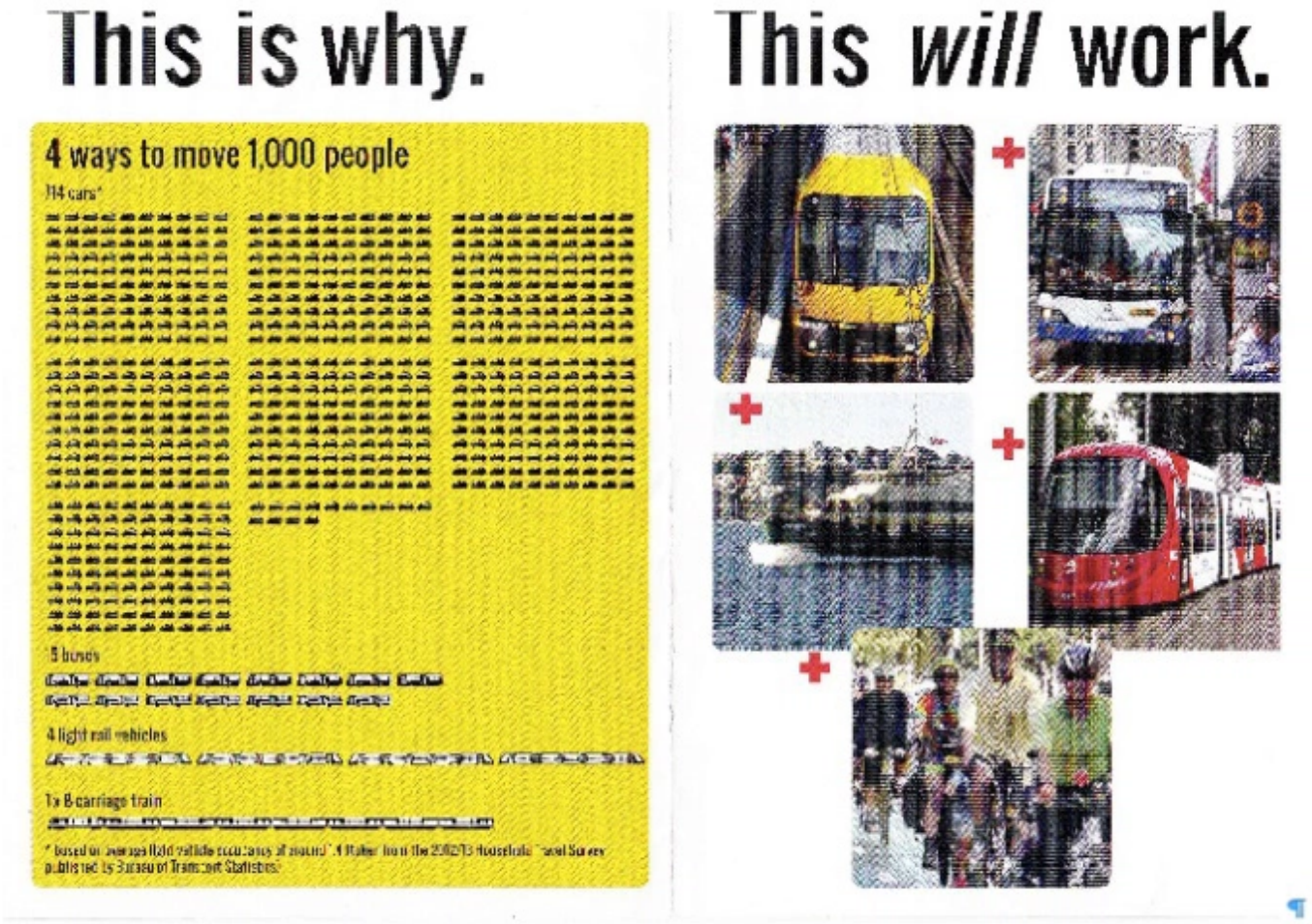
(M4 EIS M4 East EIS Volume 2A Appendix A-G, page 10-6)

What is the plan post 2031? Building more roads will not solve traffic congestion in Sydney.

WestConnex clearly fails to:

- Reduce car dependency
- Meet the needs of our growing suburbs
- Get more people on public transport

The Benefit-Cost analysis of WestConnex is evaluated over a 40 year period. Relieving traffic congestion on the corridor appears to be a major objective of the project. The project reaches capacity in the M4 East tunnel within eight years after project completion. This does not seem to be an effective means of relieving congestion. The Cost-Benefit analysis should include costs of additional measures required over the remaining 32 years of the project life to maintain the claimed congestion and travel time savings. If included, it is likely that the project costs will significantly outweigh any benefits.



(https://m4eis.files.wordpress.com/2015/10/this-is-why-this-will-work-tiff.jpg)

M4 East Past and Present

The M4 East was previously proposed in 2003/2004. The Sydney Motorways Project Office prepared a strategic environmental review of the WestConnex project in 2013. Chapter 4 of the review outlined the WestConnex scheme development and alternatives.

It is worth noting that this section covering alternatives to the then $10.5 billion project was only four pages long out of a 127page document. The review gave a brief history of the M4 East proposal.

> "The M4 Motorway between Emu Plains and Concord has been progressively developed over a 40 year period. The section between Parramatta and Concord was opened in 1992. An eastern extension of the M4 Motorway to the Sydney CBD was subsequently planned and a scheme was publicly exhibited in 2003 to 2004 which proposed extending the motorway to the City West Link and widening the existing motorway. This scheme did not proceed due to concerns over economic viability and environmental impacts." (p.25)

In the current M4 East EIS the following explanation is given:

> "Between 2003 and 2004 a preferred option for an eastern extension of the M4 to the Sydney central business district (CBD) was developed and publicly exhibited. This option, referred to as the M4 East, proposed extending the M4 to the City West Link and Parramatta Road at Ashfield as well as widening the existing motorway between Homebush Bay Drive and Concord Road. This scheme was put on hold indefinitely by the then NSW Government. The 2003 preferred option formed the basis of the concept design for the M4 East project, which forms part of WestConnex."
> WestConnex M4 East Environmental Impact Statement, Volume 1A, WestConnex Delivery Authority, September 2015, Page 4-1

The two reports appear to contradict each other. It is quite a different proposition to a project being abandoned "due to concerns over economic viability and environmental impacts" and simply putting the project "on hold". There is no analysis in the current EIS as to the reasons why the original proposal did not proceed. The comments in the Strategic Environmental Review should have been addressed in the EIS. What has changed since 2004 that now makes the M4 East economically viable with positive environmental impacts? The failure to release the business case further exacerbates the situation.

The project should not be approved without a full appraisal of the economic and environmental impacts of the proposal with particular reference to how the current proposal overcomes the previous concerns raised in 2004 that led to its abandonment.

The two reports appear to contradict each other. It is quite a different proposition to a project being abandoned "due to concerns over economic viability and environmental impacts" and simply putting the project "on hold". There is no analysis in the current EIS as to the reasons why the original proposal did not proceed. The comments in the Strategic Environmental Review should have been addressed in the EIS. What has changed since 2004 that now makes the M4 East economically viable with positive environmental impacts? The failure to release the business case further exacerbates the situation.
The project should not be approved without a full appraisal of the economic and environmental impacts of the proposal with particular reference to how the current proposal overcomes the previous concerns raised in 2004 that led to its abandonment.

Reasons given for Westconnex M4 East don't stack up

> "Parramatta Road is now one of the six most congested transport corridors in Sydney, with high travel demand and average travel speeds of private vehicles during the morning peak of about 30 kilometers an hour."
> WestConnex M4 East EIS, Vol 1A, Page ii

The EIS does not say where Parramatta Road sits in the top six most congested roads in Sydney. Is it the worst or is it the sixth worst? If it is the sixth worst why is $15.5 billion being spent on this corridor while the other five more congested corridors are not being given

priority? There is no discussion in the EIS on the comparative advantages of spending the money on WestConnex as opposed to the other congested corridors.

> "The Parramatta Road corridor is also one of Sydney's busiest corridors for public transport. It has one of the highest number of bus passengers during the morning peak of any major bus route in Metropolitan Sydney." M4 EIS vol 1A p.ii

Buses from the inner west carry around 10,000 passengers in the busiest hour into the city (as measured at Broadway). This includes the routes along Parramatta Road and King Street Newtown. However, in the study area, in particular Parramatta Road between Concord Road and Burwood Road there are no existing bus services. Between Burwood Road and Wattle Street, there is only one bus route the 461. This route has a peak frequency of 4 buses per hour. This gives a capacity of less than 250 passengers per hour. It is not a strong bus route due in part to its proximity to the main western rail line which accounts for most of the peak public transport demand on the corridor.

The EIS paints a false picture of public transport in the corridor. It suggests that there is already high public transport service and use on the corridor and that WestConnex will free up lanes on Parramatta Road for more and faster bus services. The implementation of bus lanes is stated to be the main public transport initiative of WestConnex. However, the project does not deliver bus lanes along the length of the Parramatta Road until after 2031.

WestConnex will have a net negative impact on public transport use. Refer to Part 3 on Congestion pricing for more information on why expansion of urban motorways has a negative impact on public transport.

Part One of Kennedy Submission can be found here (http://m4eis.org/2015/10/29/transport-economist-explains-poor-project-selection-behind-westconnex-part-1-lyall-kennedy/)

Submissions to the Westconnex EIS process close on November 2, 2015. Here's how you can make a submission: http://m4eis.org/2015/09/11/how-to-object/ (http://m4eis.org/2015/09/11/how-to-object/)

3 thoughts on "**Narrow interests plus public transport failure behind Westconnex M4 East – Lyall Kennedy Submission Part 2**"

1. **Kathryn** says:
   29/10/2015 at 11:15 pm Edit

   2 WestConnex fails the objectives of the NSW Transport Master Plan
   WestConnex is an anomaly to the NSW Transport Master Plan 2012
   The WestConnex EIS claims that it was a legitimate part of the long term transport planning for NSW for which it is very obvious that it was retrofitted after the event.

The NSW Master Transport Plan December 2012 was written from the perspective of improving the mobility for residents and visitors to Sydney through the modernising and connectivity of Public Transport.
The focus mentioned frequently throughout the document was to reduce car dependency and thus congestion by investing further in the various modes public transport. The main initiatives were to address the lack of rail connectivity, by enhancing the current radial mode to be a more networked and connected system. It also included complementary improvements with other modes, such as increase dedicated bus lanes plus BRT, increased cycle-ways and encouraging walkability. The livability of communities and protection of the environment was a key outcome of the Plan.
"Most of Sydney's rail network was built more than 100 years ago and is primarily centred on servicing the CBD. There has been little recent expansion of the network, with 39 kilometres of the total CityRail system of 1,050 kilometres built in the past 33 years (as at 2012).. As Sydney has grown and evolved to a multi-centred city, its needs have changed and our rail system needs to evolve to keep up with these changes."
"Businesses often cite the lack of public transport connectivity as an inhibitor to establishing a presence in the three regional cities of Parramatta, Penrith and Liverpool, as well as precincts like Macquarie Park, Sydney Olympic Park and Port Botany".

"By enabling industries to set up in the regions, in transport terms, this would reduce the impacts of dispersed employment in Greater Sydney, alleviate car dependency and long commutes, and promote more liveable communities".

The below comments – lifted from the Master Plan – succinctly encapsulate the rationale of this Plan:
"Regular physical activity is important to our health and wellbeing. Recent research shows that many people get an additional eight to 10 minutes of exercise each day when they use public transport. Importantly, being active for part of our journey to work or school incorporates exercise into our daily routines. The NSW Centre for Population Health has observed that public transport use, walking and cycling are associated with a number of health benefits, including a reduced incidence of obesity, higher levels of exercise and improved mental health.
Building social and community goals into our transport planning will strengthen communities, reduce disadvantage and open up opportunities. To meet our objective of reducing social disadvantage, we will require new ways of thinking about how to distribute transport services more evenly across the State. We will need to give people healthier travel options, such as making it easier and safer to cycle to work or walk to the nearest train station. We will also need to integrate our transport system more closely with land use planning, creating well-designed cities and suburban centres that reduce our reliance on cars, encourage us to be more active and produce safe, attractive and well-used urban spaces".

The inclusion of the WestConnex project at various points throughout the document is an anomaly to the key rationale of the original document.

NSW Master Transport Plan Vision
"The city will become more liveable by improving the design of buildings and public areas, developing mixed-use spaces where people work and live, and creating more opportunities for people to walk and cycle to work and major service centres. Protecting our natural

environment, improving access to green spaces and improving air quality will be critical. The Metropolitan Strategy for Sydney underpins this land use and planning vision for Metropolitan Sydney to 2031.
Central to these outcomes will be an integrated and efficient transport system that is closely aligned with land use planning. Sydney's transport infrastructure and services will cater to the customer, providing diverse transport options and reduced travel times, while being readily accessible across all parts of the city. Improved public transport networks will increase productivity and global competitiveness."
"Improve sustainability – by maintaining and optimising the use of the transport network, easing congestion, growing the proportion of travel by sustainable modes such as public transport, walking and cycling, and becoming more energy efficient"
"For public transport – If Under a 'do nothing' scenario, most travel in Sydney would continue to be by motor vehicle, with roughly the same percentage of trips still made by car in 2031.
"Transport has an important role in supporting Sydney as a global city. Strong connectivity across the city, quality public transport networks and opportunities for walking and cycling can all contribute to maintaining Sydney's role as a centre of economic and social activity".
"The city will become more liveable by improving the design of buildings and public areas, developing mixed-use spaces where people work and live, and creating more opportunities for people to walk and cycle to work and major service centres. Protecting our natural environment, improving access to green spaces and improving air quality will be critical.
"Central to these outcomes will be an integrated and efficient transport system that is closely aligned with land use planning. Sydney's transport infrastructure and services will cater to the customer, providing diverse transport options and reduced travel times, while being readily accessible across all parts of the city. Improved public transport networks will increase productivity and global competitiveness"
The Master Plan also goes on with the rationale "Currently, around 14 percent of greenhouse gas (GHG) emissions produced in NSW come from the transport sector, making it the State's second highest source of emissions. In the context of population growth and increasing travel demand, mitigating GHG emissions is a major challenge for the future".
"Providing people with opportunities to use public transport instead of private vehicles will help to reduce the environmental impact of transport in NSW. Increased walking and cycling, particularly for short, local trips, will also contribute to improved environmental outcomes."
" The cost and availability of oil and the rising cost of electricity will also have a direct influence on the choices we make in procuring the most environmentally sustainable and energy efficient technologies to power our transport fleets".
"The growing travel task is also a challenge for preserving the amenity of many of our communities. The movement of freight is rarely silent and the generation of noise on a shared network in proximity to residential areas is a recognised issue".
The WestConnex project and its horrible impact on communities, vulnerable species and the environment is a complete juxtaposition to the vision for Sydney's mobility by Gladys Berejiklian (previous Minister for Transport)
I strongly object to the WestConnex project, as it fails to match any of the required core outcomes of the NSW Travel Master Plan.
I strongly object to the WestConnex project as it represents a lost opportunity to "Get Sydney moving". The funds required to fully implement the exciting public transport

projects that will significantly improve connectivity of rail, bus, cycle and walking opportunities as proposed by Ms Berejilian will not be available. Instead, funds are redirected to a road project that is a space hungry, low volume mode of transport. It eschews Ms Berejiklian's rational plan for Sydney, instead resulting in the perpetuation of car dependency, more pollution, more traffic noise, more congestion, and more GHG emissions. It reduces the livability and amenity of our suburbs. It removes important greenspace and vegetation that is critical for the survival of vulnerable species and for the health and wellbeing of residents.
I strongly object to the misrepresentation contained in the EIS that WestConnex was part of the NSW Transport Master Plan 2012. It is reasonable to conclude that WestConnex was retrofitted later, rather than being a legitimate part of the long term plan scope.

Reply (http://m4eis.org/2015/10/29/narrow-interests-plus-public-transport-failure-behind-westconnex-m4-east-lyall-kennedy-submission-part-2/?replytocom=272#respond)

2. **Transport economist explains poor project selection behind Westconnex : Kennedy Submission, Part One | A People's M4 EIS** says:
30/10/2015 at 4:18 pm Edit

   […] Part 2 of Lyall Kennedy's submission can be found here […]

   Reply (http://m4eis.org/2015/10/29/narrow-interests-plus-public-transport-failure-behind-westconnex-m4-east-lyall-kennedy-submission-part-2/?replytocom=282#respond)

3. **Peter Galvin** says:
31/10/2015 at 9:01 pm Edit

   Good work Lyall

   Reply (http://m4eis.org/2015/10/29/narrow-interests-plus-public-transport-failure-behind-westconnex-m4-east-lyall-kennedy-submission-part-2/?replytocom=310#respond)

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The Big Brother Theme (https://wordpress.com/themes/big-brother/).

I strongly urge the Department of Planning & Environment to reject the M4 East EIS. Some of the reasons I call for this are elaborated below.

I would welcome the opportunity to expand on my concerns at any public hearings that may be held as part of your deliberations.*(This is an important point. The Westconnex project desperately needs open and transparent inquiry including hearings but the NSW government has no plans for these.)*

Lack of Transparency and Proper Process in Project Selection

The Federal and NSW governments have called WestConnex the largest road infrastructure project in Australia's history. For such a major piece of infrastructure it has had a relatively short period of review. It appears to have been 'fast-tracked' bypassing important evaluation steps aimed at providing assurance to government and the taxpayers that the project is the best solution.

The Productivity Commission in its recent inquiry into public infrastructure found, "an urgent need to comprehensively overhaul processes for assessing and developing public infrastructure projects."

It pointed to "numerous examples of poor value for money arising from inadequate project selection, potentially costing Australia billions of dollars". It argued that further spending under the status quo will simply increase the cost to users, taxpayers and the community, and lead to more wasteful infrastructure.(1)

At the request of the Senate Select Committee into the Abbott Government's Budget Cuts, the Grattan Institute recently prepared a paper on infrastructure financing and expenditure with a focus on transport infrastructure.(2)

To get a better return from infrastructure spending, governments should focus on selecting the right projects, and on making the business cases and their underlying assumptions more transparent. Governments can also get a better return through use of new technologies to get more value out of existing infrastructure; through minor augmentation and relief of pinch points; and through more systematic maintenance.

"The capacity to waste money is a serious risk for infrastructure, given the very large amounts of money involved." (p.1)

Infrastructure investment over the past five years has been about one per cent of GDP higher than a decade earlier. Such a significant increase would have been expected to have some visible effect on GDP growth. There is no evidence it has done so, with GDP growth still well below three per cent per annum and below historic growth rates.

"The wrong projects can destroy value and divert funds from projects that would be more valuable to the economy and community." (p.4-5)

"Australia could get better value from public infrastructure by making better project selections. Unreliable or non-existent cost-benefit analyses have been an obstacle to optimal project selection. Recent large infrastructure projects in Australia have typically suffered from cost overruns of about 15 per cent, while patronage has been 15 per cent lower than projected, on average. As a result, real cost-benefit multiples are expected to be about 25 per cent lower than projected on average. All other things being equal, this consistent overestimation of benefit-cost ratios is making uneconomic projects look viable at the approval stage." (p.5)

Unfortunately, the WestConnex project does not appears to be an example of industry best practice in project selection and transparency (see NSW Auditor General's comments below). Calls for the release of the business case have been opposed by both the Federal and NSW governments. If there is such a compelling business case, then why isn't it being shared with the Australian taxpayers who are bearing the risks associated with this project.

The NSW Auditor General's Performance Audit of WestConnex (http://www.audit.nsw.gov.au/news/westconnex-assurance-to-the-government) conducted in 2014 highlighted the importance of proper evaluation and identified some serious deficiencies in the development of the WestConnex project.

The Executive Summary of the Auditor General's audit concluded:

"In the period covered by this audit, the processes applied to WestConnex to provide independent assurance to Government did not meet best practice standards…

"The preliminary business case submitted for Gateway review had many deficiencies and fell well short of the standard required for such a document. Further, on our analysis, the business case put to the Government still included some deficiencies that independent Gateway reviews and external assurance arrangements, if they had occurred, should have identified…

"The post-business case governance arrangements did not clearly separate board-level responsibilities for commissioning from responsibilities for delivering the WestConnex project. After not separating the roles, they also failed to provide mechanisms to effectively manage the conflict between these roles.

"The WestConnex project offers several lessons. While good internal controls are critical, they are not a substitute for externally managed Gateway reviews. Steering committees and boards cannot be responsible for both project delivery and independent assurance and reporting to the Government. Responsibility for commissioning should be clearly differentiated from the responsibility for project delivery. Challenging deadlines heighten the need for good assurance but, paradoxically, also the risk of departure from best practice." (p.3-4)

"The Government approved a new Major Projects Assurance Framework in December 2011…
"The objective of the Framework is to increase the Government's confidence and assurance in planning and implementation of major projects through their entire lifecycle, specifically:

– prevent projects failing or not realising their stated objectives/benefits
– improve clarity in the feasibility phase of projects
– drive better governance
– inform Cabinet Infrastructure Committee intervention

"A key component of the Major Projects Assurance Framework is the Gateway review system. The Gateway system is a series of structured reviews at key decision points (gates) in a project's lifecycle.

Gateway gives the Government a level of independent assurance on:
• whether an investment in a project is warranted
• the strategic options considered
• the agency's capacity to manage and deliver the project on time, on budget and achieve desired project outcomes
• whether a project is on track and ready to move to the next phase."(p.10-11)

WestConnex Concept

"Based on the Major Projects Assurance Framework, we expected a Gateway review (or similar arm's length, independent review) either during the concept phase or early in the development of the business case.

"The Major Projects Assurance Framework introduced a Gate Zero to provide assurance that projects are well justified after considering a wide range of options. A Gateway review or similar should therefore be conducted early in a project's life cycle to provide assurance around whether:
• the need for a project is properly defined
• there is justification for addressing that need
• the best value means of servicing that need are being proposed after considering a broad range of alternatives and their associated costs and benefits.

"We also expected that Infrastructure NSW or some other body would have recognised the need for a Gateway review during the concept phase, or early in the development of the business case and taken steps to ensure this occurred, including reporting to the Cabinet Infrastructure Committee.

"There was no independent Gateway review or equivalent undertaken at the concept stage. Infrastructure NSW has indicated that the concept paper it prepared to advise Government before WestConnex was publicly announced was not subjected to any independent assurance reviews. The first gateway review was of the preliminary business case late in the business case development phase.

"We saw no evidence that:
• the Government specifically exempted WestConnex from the Major Projects Assurance Framework Gate Zero
• provided an explanation or justification for the variation from the Major Projects Assurance Framework
• the alternative approach adopted was assessed as being equivalent to, or better than, the Major Projects Assurance Framework.

"…we believe that a Gate Zero Gateway review should have been conducted. It would have provided independent assurance that the project was justified…

"Infrastructure NSW's roles at this stage of the WestConnex project were in conflict. It was responsible for developing the WestConnex concept and at the same time it was the key agency responsible for providing assurance to Government over major capital projects including WestConnex. A fundamental principle is separation between those providing independent assurance and those developing and delivering a project." (p. 16-17)

Developing the business case

"Given no Gate Zero Gateway review was conducted during the concept phase, we expected one (or an equivalent arm's length, independent expert review) at the beginning of this phase.

"In line with the Transport for NSW Investment and Gating System we also expected to see the following Gateway reviews (or equivalent arm's length, independent expert reviews)
- *a strategic business case review (Gate One)*
- *a preliminary business case review (Gate Two)*
- *a final business case review (Gate Three).*

"We expected there would be acquittals of each of these reviews, and that the review reports and acquittals would be provided formally to Infrastructure NSW and followed up in each subsequent Gateway review or equivalent. We also expected regular progress reports to, and monitoring by, Infrastructure NSW." (p.21)

"We expected to see outputs from the other peer reviewers but detailed reports were limited to infrastructure solutions, capital costs and traffic analysis. Even here, timing was a concern. The peer reviewer engaged to review the traffic analysis produced a report, but not until November 2013 after the business case went to the Government. The reviewer's report indicated that the review was supposed to be continuous throughout the process of modelling, but the traffic modellers were too pressed for time to consult on a continuous basis with the peer reviewer. The reviewer described the exercise as more an audit than a peer review. The reviewer concluded that the traffic data he received in early August 2013 'raises questions about the underlying quality of the modelling'.

"The agencies concerned advised us that significant analysis and review of traffic numbers was undertaken by the specialist work streams established within the Project Office. However, we have seen no evidence of an independent, arm's length review of the traffic analysis used for the final business case, by someone technically qualified to do so, before the business case was presented to the Government. "We did not find peer review outputs for land use, urban planning or transport planning."(p.26)

Gateway review of preliminary business case

"One formal, independent Gateway review was conducted during the development of the business case. This was of a preliminary business case.

"In its report to the Sydney Motorways Project Office (dated 14 June 2013), the Gateway Review Panel concluded that:

"due to lack of key information presented for the review, the Gateway Review Panel was not able to form a view on whether the project is a worthwhile and prudent investment (both economically and financially viable) for the NSW Government".

"Further, the Gateway Review Panel stated that:
"A number of key documents were delivered later than anticipated and the Review Panel had very limited time to review the Silver business case.

"Relevant documentation relating to a number of critical areas of the business case was not available for review – these included the Governance Section, Financial Plan and Communications Plan. The absence of these documents did impact on the ability to review related sections.

"The Review Panel did not have access to a number of Stakeholders or documents that were considered essential in order to satisfactorily complete the review.

"The Review Panel noted that not all key benefits nor all key risks were adequately documented, and that the business case would benefit from these and other inclusions". (p.28)

"The Gateway Review Panel also found the preliminary business case should have been more advanced than it was and would have benefited from previous iterations and review processes which had not occurred.

"The Gateway Review Panel's 'traffic light' risk ratings against the Gateway criteria were all red and yellow, with no greens." (p.29)

Red: critical and urgent – project strategy to address the shortcomings/recommendations is to be established before project is further progressed.

Yellow: Important and urgent – project should go forward with action on recommendations. Source: WestConnex preliminary business case Gateway review 2013.

Matters a Gateway review may have identified

"We reviewed the final business case and identified some issues with the underlying analysis which we believe a full Gateway review should have identified.

"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." (p.31)

Purpose of the business case

"Roads and Maritime Services say that the assurance provided to the Government on the WestConnex business case was appropriate for its purpose.

"It says the overall objective outlined in the Business Case Implementation Plan was to "produce a business case that demonstrates the overall technical and financial viability of the WestConnex scheme, consistent with the State's Fiscal Strategy".

"Roads and Maritime Services advised that at the conclusion of the business case in July 2013, Stage 1 was regarded as being sufficiently developed to proceed to procurement and environmental planning phases. For the other stages, the business case outlined a pathway for their further development and planning. It says that it was always envisaged that there would be additional Gateway reviews conducted on the component parts of the scheme.

"Roads and Maritime Services' arguments do not justify the lower level of independent assurance provided on WestConnex than that offered by the Major Projects Assurance Framework. The objective was to "produce a business case that demonstrates the overall technical and financial viability of the WestConnex scheme, consistent with the State's Fiscal Strategy." Approval of the business case was the key decision point so far for this project, and arguably the stage at which independent assurance was most critical."(p.31)

(Ed:This is end of quotes from NSW Auditor General's report)

Conclusion to Part one of Kennedy Submission

Failure to abide by the Major Projects Assurance Framework and employ best practice governance from project inception has greatly reduced community confidence. The Community is being asked to comment on an EIS that is deficient in analysis of project justification.

A condition of consent for the M4 East should include adherence to the NSW Government's Major Projects Assurance Framework. Vital gateway reviews which should have been undertaken before the preparation of the EIS (and certainly before awarding construction contracts) should be commissioned, completed and made publicly available before any further approvals are issued.

Footnotes

1. Inquiry into Public Infrastructure, Productivity Commission (2014)
2. Submission to Select Committee into the Abbott Government's Budget Cuts, Marion Terrill, Transport Program Director, Grattan Institute (August 2015)

Part 2 of Lyall Kennedy's submission can be found here (http://m4eis.org/2015/10/29/narrow-interests-plus-public-transport-failure-behind-westconnex-m4-east-lyall-kennedy-submission-part-2/)

You have only three more days to lodge a submission to the M4 East EIS .. here's how you can do it
http://m4eis.org/2015/09/11/how-to-object/ (http://m4eis.org/2015/09/11/how-to-object/)

(https://m4eis.files.wordpress.com/2015/10/img_3611.jpg)

EIS submission Pub Night – Newtown Social Club October 28, 2015

Create a free website or blog at WordPress.com (https://wordpress.com/?ref=footer_website).
The Big Brother Theme (https://wordpress.com/themes/big-brother/).

A People's M4 EIS

Tackling Congestion with congestion pricing; Important questions but no answers from Westconnex – Lyall Kennedy Submission Part 3

30/10/201531/10/2015 wendybaconblog Commentaries & Objections City West Link, Congestion Pricing, Freight, Gratten Institute, Ian McCarthy, Queuing, tolls, transport infrastructure spending

Given that congestion levels are only likely to be reduced for a maximum ten years, at which point we would be back to where we are in 2015, there needs to be consideration of alternative ways to manage and reduce congestion.

Infrastructure NSW commissioned a discussion paper on congestion pricing. The paper *Pricing Congestion in Sydney* was published by ICIL Tasman in April 2012. The paper reviews alternative ways to manage congestion:

Almost everywhere, not just in New South Wales, governments have persisted in excluding congestion pricing from their changing mixes of anti-congestion measures, despite increasing urging from economists over the past 60 years to apply this policy instrument. These changing policy mixes have typically failed to stop congestion from worsening in medium-sized and large cities around the world. So, failed anti-congestion strategies are the norm.

Until the late-1970s, governments typically saw road building as the solution to congestion. However, high costs and assumed futility because of traffic attraction by new capacity ("induced traffic" or "induced demand") led to changes to anti-congestion strategies. Governments increasingly switched resources from roads to public transport, cycling and walking facilities, and operating subsidies for public transport. In some cases, governments re-allocated some pre-existing road lanes from general purpose use to access by buses and other multi-passenger vehicles, which effectively added to public transport subsidies. Many governments buttressed these policy changes with measures such as higher on-street and off-street parking charges, information programs regarding public transport services, and promotion of car-pooling arrangements.

All of these policy instruments were meant to reduce demand for road space and increase demand for alternatives to road-use by single occupancy vehicles. Transport planners typically described some or all of these policy instruments as 'demand management measures'.They considered them to be substitutes for congestion pricing.

These "demand management measures" failed to stop the inexorable worsening of congestion, even though the major measure, subsidised public transport, involved 100 per cent capital subsidies and operating subsidies in excess of 75 per cent of operating costs. Indeed, costs of all of these "demand management measures" have been found to be high relative to numbers of passengers attracted from single-occupancy vehicles. An important oversight by proponents of these measures is that they are just as likely as increases in road capacity to be undermined by "induced traffic". Another neglected problem is that public transport subsidies have facilitated inefficient operating arrangements.
"Public transport, cycling and walking have often been described as "sustainable transport", because use of these modes by commuters reduces congestion and emissions caused by cars. However, the fiscal unsustainability of an ineffective strategy of trying to reduce congestion to acceptable levels through heavy subsidies has been overlooked.

Many governments also took steps to change urban land regulation policies to try to increase urban densities, at least in and around major activity centres and major public transport hubs and routes. They hoped that this would encourage greater use of transport modes other than cars, and improve the viability of public transport. However, these actions have not reduced congestion and may have increased it. They have overridden consumer preferences and distorted relative prices of land and capital, inducing substitution of capital for land. The result has been resource misallocation.

Because massive public transport subsidies, other "demand management" policies, and regulated increases in urban density have made little impact on congestion, some governments, notably those in New South Wales, Victoria and Queensland re-considered their policies of restraint on provision of general purpose arterial road capacity, particularly in the case of by-pass or orbital roads. Toll roads (typically involving public private partnerships) were often preferred to provision of free-access arterials, because of the high costs of urban arterial road provision in the context of fiscal stress associated with high costs of maintaining public transport subsidies.

While governments have claimed that toll roads would help alleviate congestion, these roads typically have been priced simply to recover full costs (including a reasonable rate of return on capital). Such pricing is incompatible with congestion-alleviation, because full cost recovery is possible only if tolls are set to toll-off sufficient potential users to ensure a wide difference in quality of service between tolled and free-access facilities. Pricing of new roads to alleviate congestion would require low and possibly negative prices.
(Pages.vii -viii)

The paper then goes on to argue the benefits of congestion pricing:

Current anti-congestion policy-mixes for Sydney, as for most other major metropolitan areas, are ineffective and economically inefficient. Economically sensible reform would substitute congestion pricing for heavy public transport subsidies, parking levies/supply restraints, and tolling of new roads.

Ideally, prices under a congestion pricing regime would reflect marginal external costs of congestion — the difference between congestion costs caused and borne by each road-user. Prices would vary over time, across the network, and between vehicle-types. Prices would be highest in the busiest periods and locations, and for the largest vehicles. Zero prices would apply in free-flow conditions.

This "internalisation" of marginal external costs of congestion would induce changes to travel modes, routes and times, reducing traffic at peak times and locations. Delays, stress, fuel and emissions would be cut and transport facilities would be better utilised.

Congestion pricing would ensure "induced traffic" effects did not undermine benefits of new road, public transport, cycling and walking facilities, and information programs on urban transport options. Therefore, it would increase benefits from these initiatives. Meanwhile, these infrastructure and "demand management measures" would help pricing to induce changes in peak-period travel behaviour.

Congestion pricing is primarily a policy instrument for alleviation of congestion in an efficient way. It is very different concept to applying tolls to new roads to recover their full costs or to existing roads to raise money for further investments in urban transport infrastructure or some other purpose. "Unlike cost-recovery tolling of new road segments in dispersed locations, or tolling of existing roads to raise money, congestion pricing would improve efficiency of use of metropolitan road and public transport networks.

Of course, congestion pricing yields revenue as a by-product of its primary function. Moreover, there is reasonable evidence to suggest that under plausible assumptions, a well-designed congestion and road damage pricing system could provide enough revenue to cover full costs of providing and maintaining a metropolitan urban arterial road network.

Parking levies and supply restrictions have sometimes been proposed as a simplified form of congestion pricing. However, these measures would not address the contribution to congestion of through-traffic, commercial vehicles, and the length, route and timing of trips. In contrast, a well- designed congestion pricing system would do so.

Pricing of crowded roads would improve bus fuel economy, trip times, and service reliability. It would increase demand for bus and rail services, allowing higher service-frequency and route-density, which would attract still more passengers. Induced increases in residential and commercial densities around public transport corridors and destinations would reinforce these trends. A cycle of increasing demand for services and declining unit social costs of public transport-use would occur.

Congestion pricing should be accompanied by a restructuring of public transport fares. Congestion pricing raises effective prices of using single-occupancy vehicles in peak times and locations relative to effective prices of travel at other times and routes, and by other transport modes, including public transport. Therefore, continuation of subsidies to public transport to change relative prices of car and public transport-use would be redundant. Moreover, the reduced cost structure of public transport would have to be factored into fares. They should also be adjusted to manage passenger congestion and allow for broader, flatter peak periods. The various effects of congestion pricing should improve public transport's viability, reducing subsidy requirements.

It is extremely important to note that congestion pricing is an essential element of an economically efficient anti-congestion package for Sydney, but it is not sufficient. It must be complemented by increases in road capacity – particularly debottlenecking and by-pass investments – and increases in public transport capacity, but not public transport subsidies. Capacity increases are required for efficient congestion alleviation beyond the short-term future.(Pages viiii-ix)

This conclusion is consistent with the findings of the Grattan Institute report on the return from transport infrastructure spending discussed in Part One (http://m4eis.org/2015/10/29/transport-economist-explains-poor-project-selection-behind-

westconnex-part-1-lyall-kennedy/) of this submission.

(https://m4eis.files.wordpress.com/2015/10/img_2988-2.jpg)

Questions asked at Canada Bay Information Session October 6. 2015

I attended an information session hosted by WDA on 6 October. I raised a number of questions with the WDA Traffic representative, Ian McCarthy. A summary of my questions and the answers provided are outlined below.

Question:
EIS Claims that it will reduce the numbers of long distance vehicles on Parramatta Rd. Where are the stats on travel distances along the corridor?
Answer:
Not included in the EIS. Estimate is that 40-45% of trips are <5km long.

Question:
What are the major origins and destinations for trips along the corridor?
Answer
Not yet done. O/d data to come later.

Question:
Where is the analysis of freight movements on Parramatta Rd?
Answer
Not included in EIS. Updated Business Case (due to be released in next 2 months) will include freight analysis.

Question
Where are the traffic counts of trucks on the corridor?
Answer
Not included in EIS.

Question
What volume of freight by type uses Parramatta Rd?
Answer
Not included in EIS. Possibly in the Air Quality section. Ian agreed to seek figures for me.

Questions
What proportion of freight could be transferred to rail?
Answer
Bureau of Transport Statistics (BTS) report on freight has been provided to WDA but not released. Ian agreed to ask for a copy.

Questions
How much freight (truck movements/tonnage) would be on the corridor if the Enfield and Moorebank intermodal terminals were operating?
Answer
Intermodel terminals have been taken into account in the modelling. (not sure how this has been done. I think it might be from BTS)

Questions
Why is the peak direction to the west in the morning and east in the pm?
Answer
Didn't have a defininative explaination. However, suggested that it may have been because of existing congestion which limits the flow in the peak direction.

Questions
Where is the analysis of LoS for North/South movement at intersections?
Answer

LoS for north/south movements has been done but not included in EIS. LoS at intersections includes all arms.

Questions
What is the likely impact on travel times if tunnel operating at capacity as predicted for 2031?
Answer
Does have impact on travel times, however, not significant. WDA will provide info on how travel times have been calculated.

Questions
Do the traffic figures include or take account of urban growth projections for future residential and employment along the corridor?
Answer
Forecast projections are included – using BTS projections. Urban growth projections have not been included as they were not available. In any case they are over a 30 year period.

Questions
How were the strategic routes for time saving analysis selected? Why was Penrith to Surry Hills identified as one of the routes?
Answer
Not sure why selected.

Questions
Potential queuing in tunnel from congestion on Wattle street?
Answer
Believe there is enough capacity on exit ramps to cater for queuing. There is about 1km from Timbrell Drive intersection and the exit ramp. The exit slip lane starts as one lane and becomes 2 lanes before exiting (I didn't get the actual length of the one and 2 lane sections). Queuing is based on 95 percentile. Challenge is to get the Timbrell Drive intersection below capacity. Think it is currently at about 1.2 [need to check EIS]. It is critical that this intersection is below capacity, due to its impact on traffic exiting the tunnel. Likely to be a condition of approval. Some options being actively considered are making the Mortley Ave to Timbrell drive movement restricted to buses only. Cutting away the "redundant" footpath on adjacent to the new pedestrian footbridge to provide 2 right turn lanes from Timbrell Drive. Extending the slip lane in Wattle street for the left turn into Timbrell Drive.

Ian McCarthy committed to providing me with more detailed responses by Friday 9 October via email. I forwarded the above table to Mr McCarthy on 7 October under the following email:

Hi Ian

It was good chatting with you on Tuesday. I ran into Matt at the Strathfield meeting last night. He told me that you were working on responses to my questions. Attached is what I took out from the discussion. Happy for you to add another column with any additional thoughts/clarifications.

I have also attached a paper prepared for Infrastructure NSW on Congestion Pricing which gives a good explanation of the past strategies to deal with congestion over the decades. Although it is marked "Confidential" I downloaded it from the website. I think you and Matt might be interested in this (if you haven't already read it).

Matt asked to be included in the email in case I have entered your email address incorrectly.

Kind Regards
Lyall Kennedy
Director
Kennedy Consulting Pty Limited
(Phone supplied)

Freight benefits are an integral part of the justification for WestConnex. It should be noted that when WestConnex was first reviewed by Infrastructure Australia it was classified as a freight project. However, there is no analysis of the current freight movements in the corridor or any discussion of alternative options for freight. This is a major weakness of the EIS. WestConnex should not be approved until the community has had an opportunity to see and review all the freight claims and impacts.

Managing Traffic to Stop Queuing in the M4 East Tunnel

Possibly the most concerning aspect of the M4 East proposal from a traffic perspective is the possible congestion on the city west link heading east going back into the M4 tunnel at Wattle Street.

The City West Link was deliberately designed with six sets of traffic lights between Haberfield and the city. This platoons traffic heading towards the Harbour Bridge and reduces congestion on the approach to the bridge.

I'm not an expert on queuing theory, however, my understanding is that every additional vehicle that joins a queue has an exponential impact on delay times.

When you look at what is happening on the north side of the Harbour Bridge, much, if not all, of the travel time savings gained through the Lane Cove tunnel are negated by the extended queue time to get to the bridge.

According to the EIS, by 2031, the M4 East tunnel is at capacity. The intersection at Timbrell Drive is also at capacity. This will result in periods when the queue on Wattle Street will extend into the tunnel. The EIS talks in vague terms about how this might be managed including ramp metering and variable speed limits in the tunnel.

Ramp metering will increase delays in the tunnel as it will restrict the flow of vehicles out of the tunnel onto Wattle Street. Variable speed limits in the tunnel will have a negligible impact on reducing congestion in the tunnel and will also increase the time vehicles spend in the tunnel.

How to lodge a submission http://m4eis.org/2015/09/11/how-to-object/ (http://m4eis.org/2015/09/11/how-to-object/)

A People's M4 EIS

Why Westconnex is not an integrated transport solution

02/11/201502/11/2015 wendybaconblog News & Updates

By Cameron White

Independent Researcher
[redacted]

This submission addresses the issue of whether the Westconnex project meets the goal of sustainability. It begins by setting out what the project and the EIS purports to do and then critiques those claims. It finds that Westconnex despite its claims is NOT an integrated transport solution.

The Environmental Impact Statement (EIS) for Westconnex East highlights the unsustainability of current transport infrastructure systems in western and inner-western Sydney. This issue of sustainability is defined in terms of congestion, amenity, health, safety and climate change. The 'Application Report' for the Westconnex East EIS shows **'transport emissions produced from the use of fuels are currently the third fastest growing component of NSW-generated greenhouse gases'.** Transport trends in Sydney and Australia are consistent with these issues. Per capita levels of car use have been in decline since 2004 and demand for public transport and active forms of transport are rapidly increasing (SGS, 2015).

Potentially, the Westconnex East EIS presents a nuanced response to these issues. Rather than a one size fits all, stand alone road project, it argues that the project seeks to target only essential forms of road-use related to freight, commercial and services tasks. Secondly, it describes the project as part of a broader integrated transport solution that includes numerous public transport initiatives designed to service commuters who might otherwise opt for road-transport.

Targeting essential forms of road-use?

- Firstly the EIS illustrates that the Westconnex East project seeks to target essential forms of road-use related to freight, commercial and services tasks. Sydney's freight, commercial and services tasks require distribution of goods and services across the Sydney basin, which relies on more diverse and dispersed point-to-point transport connections that can only be provided by the road network (4.2.3).
- The key customer markets identified for the project include highly dispersed and long distance passenger movements, as well as heavy and light freight and commercial services and businesses whose travel patterns are also greatly dispersed and diverse in nature (4.7)

An integrated transport solution?

Secondly, the Westconnex M4 East EIS highlights the need to view the project as part of a broader integrated transport solution, that includes numerous public transport initiatives. The Westconnex East EIS states:

- The project (as part of WestConnex) is considered to be a key driver for the introduction of a rapid transport solution (i.e. buses or light rail). The introduction of a rapid transit solution would result in more frequent and reliable public transport which would encourage higher patronage of public transport along the M4 and Parramatta Road corridor' (section 3.2).
- As part of a broader integrated transport solution, the project supports a coordinated approach to the management of… all modes of transport including road, rail, bus, ferries, light rail, cycling and walking (4.2.3).
- Demand management measures are [also] seen as complementary initiatives… to the project (4.2.4)

The EIS statement illustrates how Westconnex East relates to several key New South Wales Transport planning documents. These include:

- *Sydney's Rail Future: Modernising Sydney's Trains*(Transport for NSW 2012b) regarding the need to 'improve the Western Rail Line, which runs parallel to the project'.
- *Sydney's Bus Future: Simpler, faster, better bus services* (Transport for NSW 2013a). As the EIS describes it, this document states that investment in the bus network would occur in parallel with WestConnex. WestConnex would assist in introducing a bus rapid transit route along Parramatta Road in the long term, by providing an alternative route for longer distance trips (the project) along the M4 and Parramatta Road corridor. The project would be used generally by people who currently use Parramatta Road for through trips or longer distance trips. The project would include provision for a future bus rapid transit route in the design of the Parramatta Road interchange. Once in place, this bus rapid transit route could be upgraded to light rail, to respond to the increased transport demand associated with population growth along Parramatta Road (Transport for NSW 2013a).

- *Sydney's Light Rail Future: Expanding public transport, revitalising our city* (Transport for NSW 2012c). As the Westconnex East EIS describes it, *Sydney's Light Rail Future* states that in the longer term WestConnex may allow road space to be reallocated on City Road or Parramatta Road to allocate space to public transport in the University of Sydney corridor, the area that services the Universities to the west of Sydney CBD. At present, four light rail routes linking to Parramatta CBD are under investigation. One of these would connect the CBD to Sydney Olympic Park, running parallel to the existing M4 and the project to Burwood/Strathfield.

- *Sydney's Cycling Future* (Transport for NSW 2013b). Westconnex East will 'maintain and, where feasible, improving network connectivity'.

- *Sydney's Walking Future* (Transport for NSW 2013c) Westconnex East would 'improve urban amenity and road safety, contributing to an improved pedestrian environment'.

These two sets of initiatives related to, firstly, the targeting of essential forms of road-use and secondly the development of numerous integrated public transport opportunities, are both integral to the project's capacity to reduce environmental impact. As the EIS for Westconnex M4 East argues, the project will reduce greenhouse gas emissions generated by road users by around 56,800 tonnes of carbon dioxide equivalent in 2021 and around 45,400 tonnes of carbon dioxide equivalent in 2031. These reductions in greenhouse gas emissions are projected to take place in spite of the projected growth of Sydney's population. Western Sydney alone is expecting an increase in population of up to 900,000 people by 2031. An increase in transport demand from and to Western Sydney will continue to rise in parallel (Vol. 1a, p. ii).

Problems with the EIS

The problem with the Westconnex East EIS, and the reason that the project should be rejected at this time, is its inadequate capacity to explain and account for the impact of these initiatives related to, firstly, the targeting of essential forms of road-use and, secondly, the numerous public transport initiatives that form part of the broader, integrated character of the project. The inadequate capacity of the project to explain and account for the impact of these initiatives is especially apparent in relation to the public transport initiatives discussed. **These public transport initiatives are discussed only as future possibilities rather than as fundamental to the project.**

Thus, for example, while the EIS describes the project as a 'key driver' for the introduction of a rapid transport solution' and argues that it 'supports a coordinated approach to the management of freight and passenger movements, as well as all modes of transport including road, rail, bus, ferries, light rail, cycling and walking', **there is no attempt to explain what qualifiers such as 'key driver' and 'support' actually mean.**

Other attempts to explain the project as a 'broader integrated transport solution' rather than a stand-alone road project are similarly inadequate. The EIS argues that investment in the bus network would occur 'in parallel' with WestConnex; that 'once in place, this bus rapid transit

route could be upgraded to light rail'; WestConnex 'may' allow road space to be reallocated on City Road or Parramatta Road to allocate space to public transport in the University of Sydney corridor; four light rail routes linking to Parramatta CBD are 'under investigation', and so on.

Stand-alone Roads project not integrated solution

Rather than seeking to mitigate environmental impact, the Westconnex East project will proceed as a stand-alone roads project that will maximise environmental impact. Public transport alternatives will remain under-funded and under-developed and slower and less convenient than road transport. This in turn will lead to increased levels of car-traffic that will congest Westconnex east more rapidly than would otherwise be the case, increase emissions, reduce amenity create poor health outcomes and so on. These broader phenomena can be encapsulated using the term 'induced traffic'.

Likely overestimation of demand for road transport services

Secondly, the inadequate capacity of the Westconnex East EIS to explain and account for the impact of these initiatives means that the project will over-estimate demand for its road transport services. This is an important consideration. In Australia and globally, numerous recent large-scale road construction projects have been plagued by exaggerated expectations about demand. As a result, funding and resources have been allocated to unviable road construction projects. Both Sydney's Cross City Tunnel and Lane Cove Tunnel drove their initial operators into receivership. The developers of Brisbane's Clem Jones Tunnel Faired no better. The issue is not just limited to Australia. Of the 15.89 million journeys expected be taken between London and Paris during the Channel Tunnel's first year of operation, a mere 18% of those actually occurred.

(https://m4eis.files.wordpress.com/2015/11/img_3108-1.jpg)

Trucks on the existing M5

Problems with Australia's record in large-scale road construction

The credibility of Australia's ongoing investment in large-scale road construction projects has been challenged in recent years at the highest levels.
Recent Australian Productivity Commission and Treasury Inquiries suggest: 'Decisions are often based on inadequate and non-transparent information and assessment of the costs and

benefits of road projects'; 'Roads are the least reformed of all infrastructure sectors, with institutional arrangements around funding and provision remaining much the same as they were 20 years ago' (Harper et al 2015; Productivity Commission 2014).

An 'Australian Infrastructure Audit' by the independent federal advisory body Infrastructure Australia highlighted the inconsistent 'use and transparent reporting of cost benefit analyses'. It argued that, while 'market reforms have significantly improved the efficiency and competitiveness of the energy sector and more recently the telecommunications sector… [there is] a pressing need to commence the task of moving towards alternative institutional and governance arrangements in the roads sector' (Infrastructure Australia 2015).

Conclusion

The evidence provided by the EIS for Westconnex East regarding Environmental Impact management and minimisation is vague, and unsubstantiated. These inadequacies render the project vulnerable to issues related to induced traffic on the one hand and the exaggeration of demand on the other hand. These inadequacies reflect well-documented, widely recognised trends in the Australian roads sector over recent years. For these reasons the Westconnex East project needs to be fundamentally reconsidered with a view to explaining how and why the project functions as an integrated urban transport solution.

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Create a free website or blog at WordPress.com (https://wordpress.com/?ref=footer_website).
The Big Brother Theme (https://wordpress.com/themes/big-brother/).

A People's M4 EIS

EIS admits deterioration in Parramatta Road traffic after M4 East

15/10/201525/10/2015 wendybaconblog Commentaries & Objections Canterbury Rd, Ecotransit Sydney, Failed motorways, Level of Service F, Liverpool Rd, Parramatta Rd., Westconnex 2021, Westconnex 2031

Nearly all other claims in the EIS depend for their validity of the traffic analysis. For this reason, the analysis of the traffic section is crucial. This article by the public transport advocacy group Ecotransit Sydney (http://ecotransit-votes.info/?page_id=13) is republished with their permission.

Twenty years of failed promises

Twenty years ago the Greiner and Fahey Governments claimed construction of the M4 missing link and the M5 would significantly cut travel times and reduce congestion. Opponents said the motorways would only generate more traffic, eroding any short term improvements while pulling people off public transport and starving the rail and other pubic transport networks of funds for further development.

Today, Sydney's road traffic is worse than ever and in some inner urban areas where the motorways converge, motorists are beginning to experience **'super-jams'** — delays where people can get caught in traffic for hours.

M4 Widening

The EISs for the M4 widening and M4 East don't hide the fact that a similar future is waiting for everyone if these projects go ahead. A close look at the numbers shows that **congestion is anticipated to get worse in many areas and traffic volumes on some sections of Parramatta Road are anticipated to be higher than if WestConnex was not built**.

The spin used by the WestConnex Delivery Authority to justify the projects is that while the motorways won't generate any significant improvements, the next motorway that connects the M4 and M5, will. The predictions are that travel times will improve on most routes from around 6 to 8 minutes in the morning peak by 2021 to an earth shattering 10 to 12 by 2031 if the full $15.4 billion WestConnex scheme is built.

With about eight different motorway projects under discussion in Sydney and an embarrassing recent history of legal proceedings over traffic predictions for tollways, coupled with little in the way of public transport for western Sydney, the community can be easily forgiven for feeling this situation is getting ridiculous and out of control.

Let's start with the M4 Widening. The EIS states that by 2021 with minimal network changes at a point near Duck Creek, Parramatta Road will be carrying 43,990 vehicles on average per day, per year. With the M4 Widening it will carry 59,370 — that's 35 per cent more — because with a toll in place, some traffic will divert to using non-tolled roads. Victoria Road to the north is estimated to carry a daily average of 70,250 per day, per year with the M4 Widening instead of 60,440 — that's 16 per cent more — also because of toll diversion. By 2031 with the full WestConnex scheme in place, volumes will rise to 62,490 for Parramatta Road and 75,770 for Victoria Road. If WestConnex isn't built, the 2031 estimates are 52,030 for Parramatta Road and 68,250 for Victoria Road.

M4East

Moving on to the M4 East, at points along Parramatta, Liverpool, Punchbowl and Canterbury roads, the story is much the same. Traffic volumes on local roads are higher with the M4 East motorway and full WestConnex motorway scheme in place than they would be without them. By 2021, average weekday traffic on Parramatta Road would be just over 29,000 in the 'do minimum' case but 42,000 in the 'do something' case. For Liverpool, Punchbowl and Canterbury Roads, volumes stay pretty much where they are with no real improvements. For 2031, the estimated traffic volumes, are all higher or much the same , with the full WestConnex scheme in place with the exception of Liverpool Road which would see just 2,000 less vehicles on average on a weekday.

These results don't sit well with the claims from politicians that more motorway building will take traffic off local roads. One of the reasons why traffic volumes will remain high on many sections of Parramatta Road and other local arterial roads is because the motorway will unleash another round of induced traffic growth and significant sections of the network are needed to act as feeder routes to the M4. When taken as a whole — traffic on the motorways and local arterial roads — the volumes are always higher with the motorways in place. Results from the intersection analyses in the EISs aren't much better. Using a traffic engineering standard that measures congestion on a scale from A to F, where F represents a breakdown in the flow of traffic so that queuing and extensive delays result, of the 29 intersections covered in the EIS for the M4 Widening (Church Street, Granville to Shaftesbury Road, Burwood), 15 will be operating at Level of Service F or experience a drop in service levels during the morning

peak, 7 will be much the same, while Level of Service is estimated to improve on only 7. With the full WestConnex in place 16 intersections will be at Level of Service F or worse, 4 will be the same and 9 are anticipated to improve. The results are similar for the evening peak period.

Closer to the city, an inspection of the numbers in the EIS for the M4 East for 2021 tells a similar story. Of the 39 intersections analysed (Homebush Bay Drive to Crystal Street), 14 are anticipated to be operating at Level of Service F or experience worse congestion, 11 will be much the same, while 14 are estimated to improve during the morning peak period. Results for the evening peak are similar. **With the full WestConnex scheme in place by 2031, 16 are anticipated to be operating at Level of Service F or experience worse congestion**, 10 will be much the same and 15 are estimated to improve. Results are similar for the evening peak.

25 Parramatta Road intersections would continue with extremely poor level of service

Frighteningly, of the total 68 intersections investigated along the stretch of Parramatta Road, **25 are anticipated to be operating at Level of Service F**. Add the 40,000 additional apartments that Urban Growth wants to build in the Parramatta Road corridor that have not been included in the traffic model and this number will increase so that conditions become even worse than the forlorn outcomes reported in the EISs. Keep in mind these documents are meant to be sales-pitches for the motorway. If these underwhelming results are the best the WestConnex Delivery Authority has been able to produce amongst its general obfuscation of the truth, the reality is likely to be far worse and certainly not worth spending $15.4 billion on. This is undoubtedly why the government will not release the business case for the motorways.

Blog at WordPress.com (https://wordpress.com/?ref=footer_blog). The Big Brother Theme (https://wordpress.com/themes/big-brother/).

A People's M4 EIS

A People's M4 EIS

This website exists to help people take back some control over the planning process. It is independent of any other organisation and is entirely volunteer run and funded.

Our aim is to help people access information needed to understand how the NSW Baird government's 33 kilometre Westconnex tollway project would affect not just transport options but also the future environment and health of Sydney. The People's M4 EIS is part of a broader community attempt to open up public debate about the Westconnex and counter the lack of transparency in decision making surrounding it.

The Westconnex is a single project, to be delivered in five separate stages. This means that while supposed broad benefits of the whole project are constantly proclaimed by the NSW government and Sydney Motorway Corporation, the negative impacts of the whole project are never assessed.

The EIS for the Westconnex M4 East was published by the NSW Department of Planning as a large PDF document – over 1GB, and nearly 5000 thousands of pages – on September 9, 2015. The community was given only 45 days to submit responses, although this was extended by ten days to November 2 because of a failure by the Westconnex Delivery Authority to file all the required documents.

Before waiting for the results of the EIS and planning process, the Westconnex Delivery Authority has already awarded the contract to build the M4 East to a consortium led by CIMIC (previously Leightons) and Samsung.

The way that NSW Planning Department and the Westconnex Delivery Authority have designed and published the EIS does not make it accessible. We've made it a little easier to find the bits you want (http://m4eis.org/category/table-of-contents/) in the PDFs.

We have published several parts of the EIS in a format that is easier to read (http://m4eis.org/category/selected-sections/) and enables you to cut and paste text more easily to build your own submission.

We have solicited and shared some 'plain English' commentaries to help you to make your own informed assessment of the Westconnex M4 tunnel. One of the problems with the EIS is that it fails to engage with contemporary developments in transport planning and critiques of its approach. This is a serious problem when the decisions to be made will have a huge impact.

We will be publishing some sample submissions, so that you can see what other people do or don't like about the M4 East project.

You can comment on any page or reply to anyone else's comments. If you have made a submission you would like us to share, please let us know. If you have ideas for how we can develop the People's EIS, leave a comment on this page.

In this way we hope together to break through the daunting amount of data and help the community to build strong individual and group responses.

Your contributions will help build an independent source of information for the community about the project.

Here's how you make a submission to the official planning process :

http://m4eis.org/2015/09/11/how-to-object/ (http://m4eis.org/2015/09/11/how-to-object/)

Additional Note on November 2

Parts of the People's M4 EIS has been submitted to the NSW Department of Planning to be considered as part of the assessment process.

We will continue provide updates on the rest of the planning process.

People: Many people have contributed to this project including Ben Aveling, Wendy Bacon, Luke Bacon, Henare Degan, Nicole Gooch, Miska Mandic and others.

8 thoughts on "**A People's M4 EIS**"

1. **Kerry** says:
   27/09/2015 at 11:10 am Edit

   Fantastic! Thank you to those who have worked so hard to get this site up-and-running. It will assist us residents to share our concerns and share what we have learned in interactions with the WDA "team".

Reply (http://m4eis.org/?replytocom=45#respond)

2. **Kathryn Calman** says:
27/09/2015 at 3:14 pm Edit

   This is an amazing piece of work that you have put together. Thank you!!!

   Reply (http://m4eis.org/?replytocom=46#respond)

3. **Anthony johns** says:
30/09/2015 at 9:44 pm Edit

   I think the project would be more worthwhile if it were less obviously partisan. As it stands, it's hard to believe anything you solicit written in "plain English" won't just be polemic

   Reply (http://m4eis.org/?replytocom=47#respond)

   - **wendybaconblog** says:
   01/10/2015 at 3:34 pm Edit

     The EIS is written entirely from the perspective of the 'proponent' which is Westconnex. Aecom that managed and prepared much of the EIS has involvement in many aspects of this project – from concept design to 'traffic director'. So it is reasonable to warn people to treat official EIS data and its presentation with scepticism. Likewise claims of critics should also be tested. One of the ideas behind the project is to subject the empirical claims to scrutiny so if you see any factual claims by critics you think are false Anthony Johns please be sure to comment.

     Reply (http://m4eis.org/?replytocom=48#respond)

4. **Michael Luis** says:
06/10/2015 at 8:30 pm Edit

   Keep up the good work.
   Big thanks to all the contributors.

   Reply (http://m4eis.org/?replytocom=76#respond)

5. **Janet Dandy-Ward** says:
26/10/2015 at 10:22 pm Edit

   Thank you so much for putting this together, this is really great information!

   Reply (http://m4eis.org/?replytocom=233#respond)

6. **Phil Siefert** says:
31/10/2015 at 5:43 pm Edit

   Given the steps that have been taken by the NSW Government to privatise Westconnex Delivery Authority and NSW Planning department in the name of "fast tracking": such as construction awards before planning approval, lack of independent review, and no obvious review of public transport options – I have never felt more sceptical and disillusioned by a government.

   Thank you for the clarity of your submission —

   Reply (http://m4eis.org/?replytocom=302#respond)

7. **Matt Mushalik** says:
02/11/2015 at 9:08 pm Edit

   The full listing of all chapters was very useful when writing my submission which is in the downloads section of my website

http://crudeoilpeak.info/downloads (http://crudeoilpeak.info/downloads)

Reply (http://m4eis.org/?replytocom=354#respond)

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A People's M4 EIS

AECOM poor choice for EIS given conflicts of interest

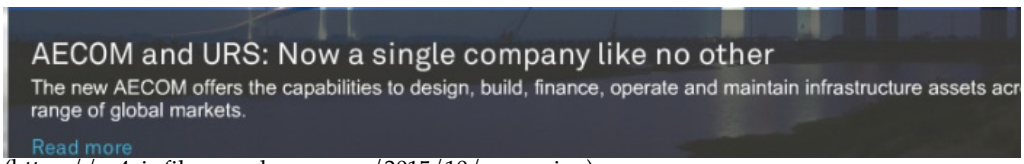
25/10/201528/10/2015 wendybaconblog Commentaries & Objections AECOM, Ashfield Council submission, Clem7, Leightons Contractors, Nimbus Consulting, RiverCity Class Action, Tishman Constructions, Traffic Predictions
By Wendy Bacon

Those who have submitted contributions to People's EIS have pointed out serious flaws in Westconnex EIS reports. On Friday, Ashfield Council published its submission (http://www.ashfield.nsw.gov.au/page/our_submission.html), which includes further critical reports from independent consultants.

It is therefore relevant to look more closely at the company that prepared the M4 EIS.

If you look inside the volumes of the M4 EIS report, you will see that they have been signed off by AECOM. This is the company that has been commissioned by Westconnex to produce the 5000 page EIS for the M4 East. It will also be responsible for the EIS M5 tunnel report that will be lodged with the Department of Planning before the end of this year.

Although not known to many Australians, AECOM is a huge global engineering company which has 100,000 employees involved in everything from oil and gas (http://www.aecom.com/What+We+Do/Oil+and+Gas/_projectsList/Firebag+Oil+Sands) to military contracting (http://www.aecom.com/What+We+Do/Government/Logistics,+Operations+and+Maintenance/Vehicle+and+Equipment+Maintanence) in 150 countries. If you imagined that the NSW Baird government would insist that Westconnex hire a company with a key focus on environmental science and social impact assessments to do an independent evaluation of a project of this significance, you would be wrong. Visit AECOM's website and you will see that it features tall buildings, US tanks and a huge ferris wheel. Look at its recent releases and you will see that a couple of months ago, AECOM was awarded a contract to provide engineering and technical support services to the Naval Surface Warfare Center (NSWC) Dahlgren Division. Just a few weeks later it announced had won a $95 million contract to support the Corpus Christi Army Depot (CCAD) in Texas. It owns Tishman Constructions that has been contracted to build new headquarters for Citi bank (http://www.marketwatch.com/story/aecoms-tishman-construction-to-manage-construction-of-leading-financial-firms-global-headquarters-in-lower-manhattan-2015-06-09) in Lower Manhattan in New York.



(https://m4eis.files.wordpress.com/2015/10/aecom.jpg)

Over the past 12 months, AECOM has more than doubled its revenue to $20 billion via several acquisitions, the biggest of which was URS Corp. It claims to have "dramatically accelerated its strategy to create an integrated-delivery platform with superior capabilities to design, build, finance and operate infrastructure assets around the world." In February this year, AECOM was the first big company to sign a covenant with the UK defence forces pledging that by 2017 it would like to see "75% of the companies in its supply chain demonstrate their support for the Armed Forces through their recruitment, charitable work or other initiatives." In Australia the company announced that it would become more involved in maintenance, construction (http://www.smh.com.au/business/construction/aecom-uses-76b-urs-takeover-to-expand-into-construction-20150325-1m7drz.html) and military contracts. It is also moving into the area of real estate financing which is another shift away from its more traditional Australian focus on engineering and design.

One might like to think that a company of this size would have the clout to produce a study with the independence that the public has a right to expect for a project that will affect the lives of millions and cost the public $15 5 billion. AECOM undoubtedly employs highly skilled environmental scientists and engineers, many of whom would prefer to be working on more socially constructive projects. But the company in Australia is under a lot of pressure. Last year the SMH reported (http://www.smh.com.au/business/construction/aecom-uses-76b-urs-takeover-to-expand-into-construction-20150325-1m7drz.html):

> "Its (AECOM's) Australian business also needs to find new sources of income to counter falling revenues. Its Australian revenues dropped by around $US150 million (A$190 million) in the 12 months to September 2014, halving a $US300 million (A$381 million) drop in revenues over the previous 12 months as demand for mining-related services weakened, according to AECOM's annual report."

The Australian arm is only a small part of the global company and is totally dependent for its survival on turning around a solid flow of contracts to satisfy the company directors and managers in New York, who in turn must keep profits flowing through to the managers of the hedge and retirement funds that are its major shareholders on the New York Stock Exchange. Government contracts are crucial in providing a solid flow of funds and jobs, which are dependent on healthy margins on contracts. This may explain why there appears to be many gaps in the EIS which gives the impression of being hastily thrown together to meet the tight deadlines set by the Westconnex Delivery Authority, NSW Roads and Maritime Services and the project's biggest fan the Minister for Roads Duncan Gay.

(https://m4eis.files.wordpress.com/2015/10/11011815_1910095755881272_916482937727738566_n.jpg)

Stop Westconnex campaigners were out and about in NY this week – AECOM's headquarters are in New York

But apart from its interest in ongoing contracts in the competitive global world of infrastructure provision, there are other reasons why when it comes to Westconnex, AECOM is far from independent,

For a start AECOM is deeply involved in a number of other aspects of Westconnex. It has been paid for a range of other services including project concept development, tunnel design and for communication services. The apparent conflict of interest between its involvement in the construction process and its management of the EIS was raised earlier in the year by New Matilda in an article by the author and Luke Bacon (https://newmatilda.com/2015/06/04/westconnex-mike-bairds-tunnel-big-corporate-love/).

AECOM has also been working with Urban Growth NSW to develop proposals for redevelopment along Parramatta Road. Urban Growth NSW works in close partnership with Westconnex.

It is not clear how AECOM manages these apparent conflicts of interest internally because questions from the media and the public to AECOM about its relationship to Westconnex and its role in the planning process are steered back to the communications branch of Westconnex.

According to searches of the NSW tender database and freedom of information searches by online publication New Matilda, the NSW government has already paid AECOM more than $33 million to work on the Westconnex. Of this amount, AECOM has be paid nearly $5 8 million for the M4 EIS.

AECOM has also been paid nearly $25 million to work on the Stage 2 M5 tunnel, including:

- nearly $13 million to be the 'technical and environmental' advisor for the M5 tunnel
- $1 3 million for 'industry partner design' which presumably meant working closely with the construction companies and sub-contractors who were interested in constructing the Westconnex M5 tunnel. These industry partners would have included Leightons Contractors with which AECOM has an ongoing business relationship including through the Kempsey by pass (https://www.leightoncontractors.com.au/projects/kempsey-bypass/) project on the Pacific Highway, the construction of a command headquarters for the Australian Defence Forces and a major road project in Western Australia.
- nearly $2 million to develop a 'close-down' plan for the Alexandria Landfill site (no information on this contract is publicly available although the waste facility on the site closed down 10 months ago). There have been repeated complaints to the NSW EPA, local Councils and in the parliament that work to remove asbestos waste from the site involves environmental breaches.

AECOM has even been paid for business services for Stage 3 which probably means that it has played a role in developing the still hidden business case for the whole Westconnex project. So a company that is already profiting out of the existing Westconnex contracts is involved in the business case for the project.

You can track Westconnex and other company contracts on http://whywestconnex.herokuapp.com/ (http://whywestconnex.herokuapp.com/) which tracks all Westconnex contracts that are above $150,000, apart from the large road construction contracts worth billions of dollars. The M4 widening, M4 East and M5 contracts have all been awarded to consortiums that include Leightons Contractors. After a series of takeovers, Leightons are now owned by the Spanish construction giant CIMIC (http://www.cimic.com.au/).

AECOM pays $280 million to settle negligent traffic modelling case

While AECOM has used the work of other companies for its air quality, heritage and other studies, it is directly responsibility for the crucial traffic studies. Indeed from as early as January 2013, the then O'Farrell government appointed AECOM to develop traffic modelling which would be used for the development of Westconnex & toll revenue forecasts for its business case.

It's on AECOM's traffic modeling that M4 East predictions for air quality and noise depend. From this point of view, AECOM's record in traffic modelling is crucial.

At the same time as AECOM was finalising its traffic study for Westconnex M4 East EIS, its lawyers were quietly mopping up the first tranche of law suits that followed its wrong traffic predictions for the failed Clem 7 RiverCity tunnel in Brisbane.

RiverCity company went into receivership in 2011 when traffic fell well below predictions. Class actions were launched against AECOM in May 2013.

By then AECOM was already involved in Westconnex. But instead of pulling back, the NSW government has granted AECOM more Westconnex contracts than any other company, apart from the winners of the big billion dollar construction contracts.

In September 2015, some the world's biggest banks, which claimed that AECOM's traffic predictions work had cost them more than $1 5 billion, settled their claim against the company for approximately $280 million. That still leaves 650 investors represented by legal firm Maurice Blackburn pursuing their claim for more than $150 million. Their case alleges that AECOM made forecasts without reasonable grounds, and left critical information out of its report published in RiverCity's Disclosure Statements. AECOM also allegedly failed to reveal that earlier traffic forecasts it had developed for Brisbane City Council showed traffic volumes substantially lower than those in the RiverCity Disclosure Statements. AECOM is defending the action and has made cross claims against directors of RiverCity.

Although its crucial role in Westconnex continues, an AECOM spokesperson told the Wall Street Journal that the company had decided to "no longer provide traffic and revenue forecasting for toll road operators or owners in Australia."

Surprisingly, the social impact study submitted by AECOM for this M4 East EIS even included a case study of the RiverCity project.

Ex-AECOM executive provides "interface" between companies and NSW government.

Last year AECOM Australia had a change of leadership when Managing Director Michael Batchelor left AECOM in May to set up his own consultancy Nimbus Consulting Pty Ltd, which Westconnex paid $445,000 between January and July this year to provide an "interface between industry and the government". (This contract has been removed by http://www.tenders.nsw.gov.au (http://www.tenders.nsw.gov.au) but can still be viewed at http://whywestconnex.herokuapp.com/ (http://whywestconnex.herokuapp.com/))

Batchelor describes his job on his LinkedIn profile as providing advice to NSW Roads and Maritime Services on its governance of, and interface with, WestConnex.

When contacted by New Matilda, Batchelor sent a message to say that as a "humble consultant to RMS", he was not authorised to speak on behalf of WDA and suggested we contact WestConnex.

There was no inference from New Matilda that Mr Batchelor is in any way involved in any corrupt conduct and the same applies to this website. But it further highlights the close relationships between AECOM, other consultants, Westconnex and the NSW government. Recently the delivery of the Westconnex was transferred to a private company, the Sydney Motorway Corporation which although publicly owned is likely to be even less transparent than the Westconnex Delivery Authority.

Independent experts concerned that assumptions underlying Westconnex traffic model are not available for testing

Experts and academics have been critical of the AECOM traffic studies for this project, one complaining that there is insufficient information about assumptions behind the Westconnex Traffic Model for other researchers to test it independently.

This can only add to community unease about the EIS and planning process, especially because AECOM has not used the opportunity of the EIS report to respond to or engage with independent consultants such as SGS Consulting that have questioned its traffic predictions for the Westconnex M4 (http://www.smh.com.au/nsw/nsw-state-election-2015/westconnex-the-wrong-project-for-sydney-report-says--invest-in-public-transport-instead-20150223-13m8f0.html).

The situation would not be so bad if the public could rely on government departments to seriously evaluate the project and engage with critiques. Unfortunately, the Planning Department will publish the responses to the EIS on its website. Westconnex and AECOM will then prepare a 'responses report'. Planners, health experts and others inside government say they will then be pressured to sign off on the EIS, although many know it is poor social policy.

Is it too much to hope that the Minister for Planning Rob Stokes and professional planners employed by the NSW government take time to seriously consider the substantial critiques of the project? From the public's point of view, it would be so much better to stop now rather than be stuck with another failed tollway project.

Here's how to make a submission (http://m4eis.org/2015/09/11/how-to-object/) to the EIS.

One thought on "**AECOM poor choice for EIS given conflicts of interest**"

1. **Police called as WestConnex protesters occupy Baird's office | Altmedia** says:
   29/10/2015 at 8:59 am Edit

   […] giant AECOM was paid millions to do the EIS, although it has strong commercial interests in the project and recently settled a damages case […]

   Reply (http://m4eis.org/2015/10/25/aecom-poor-choice-for-eis-given-conflicts-of-interest/?replytocom=262#respond)

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A People's M4 EIS

Alternatives to WestConnex

01/11/201502/11/2015 Ben Aveling Commentaries & Objections Alternatives, Costs Westconnex

At full capacity, based on similar infrastructure, the entire WestConnex tollway is estimated (http://www.smh.com.au/nsw/what-you-need-to-know-about-westconnex-the-biggest-road-weve-ever-seen-20150313-143ujn.html)to have a commercial value of perhaps five billion dollars – less than a third of its forecast cost.

In 2012, WestConnex was to cost $10 billion dollars, and the estimated benefits were $12 billion dollars. By 2013, it was to cost $11.5 billion dollars. At the end of 2014, it was forecast to cost $14.9 billion dollars. The latest (gu)estimated cost is $15.4 billion dollars. That's $15,400,000,000 – about $3,500 for every person in Sydney, whether they use it not.

The current forecast cost of WestConnex already exceeds the original estimate of benefits, and both estimates are likely to be optimistic.

All of this, to move perhaps an extra 100,000 drivers per day.

Surely, for that much money there have to be better options. And there are. There are a number of things that could be done that would, collectively, do more to relieve congestion, for less money, and without the pollution and all the other downsides.

Roads are an inefficient means of moving people. Estimates vary, but during morning peak hour under Sydney conditions, a motorway lane is typically considered to move between 2,000 cars per hour – with 1.1 to 1.2 people per car, that's somewhere between 2,200 and 2,400 people per hour. A single dedicated bus lane can move perhaps 3,500 people per hour. Depending on the configuration, a single light rail line can move around 10,000 people. Whereas a single line of heavy rail can move up to 20,000 people an hour, the approximate equivalent of 9 or 10 lanes of cars.

Ecotransit Sydney, a public transport advocacy group, has been investigating alternatives (https://www.youtube.com/user/EcoTransitSydney):

- **For less than $2 billion** the government could build a **light rail loop** that connects Balmain to Marrickville, Marrickville to Botany, continue to Randwick, enter the CBD, and go back to Balmain via Victoria Road and from Strathfield down Parramatta Road and into the CBD.

- **Light rail to Parramatta and up Victoria Road** might each cost another **$1.5 billion**. Either would move a good percentage of the capacity of the entire WestConnex project, and could be built for a fraction of the cost and time of WestConnex.
- **A new train station** could be added to the airport rail line at Doody St, midway between Mascot and Green Square, for perhaps **$75 million**.
- To take traffic off the M4, a **Bus/train/park-and-ride interchange** could provide an express service to the CBD from the former site of Pippita Station, on what was once the Abattoirs Branch line, now the Olympic Park line. A similar facility could be build at Kingsgrove, to do the same for the M5, and for less than **$100 million each**.
- Any number of existing roads in and out of the city could easily, quickly and cheaply have one lane converted to **bus only or to T2/T3 lanes**. Such measures will reduce the number of cars but increase the number of people carried.
- A more dramatic alternative would be to **use an additional two lanes of Sydney Harbour Bridge for rail**, which is how it was originally designed. The consequence would be 6000 fewer motorists per hour and up to 50,000 extra rail passengers – for a fraction of the cost and time that building WestConnex will take.

Public transport will not suit everyone. It doesn't have to. Many commuters are flexible, they switch between public and private transport as circumstances change. For example, when the M5 Cashback was introduced, congestion on the M5 increased significantly. Conversely, taking even small volumes of traffic off the road means that the remaining traffic moves far more quickly. Consider school holidays: reduction in the volume of traffic is small, the increase in the speed of traffic is significant. A nearly full road still moves quite quickly. A completely full road does not.

And have the team behind EIS considered these alternatives? You guessed it, they haven't, not properly. Or if they have, they haven't released the results in the EIS.

One thought on "**Alternatives to WestConnex**"

1. **achuter** says:
   01/11/2015 at 7:50 pm Edit

   Great post Ben. When I asked Terry Chapman why WestConnex wasn't compared against public transport alternatives, he basically said the purpose of it is to solve the problems of heavy/commercial vehicles.

   This logic is totally flawed as you have explained above. They know this though they don't care.

Reply (http://m4eis.org/2015/11/01/alternatives-to-westconnex/?replytocom=319#respond)

Create a free website or blog at WordPress.com (https://wordpress.com/?ref=footer_website).
The Big Brother Theme (https://wordpress.com/themes/big-brother/).

A People's M4 EIS

Comments on Air Quality Impact Statement

22/10/201531/10/2015 wendybaconblog Commentaries & Objections Air quality, Haberfield, Hot spots, No2, Parramatta Rd., PM10, PM2.5, pollution, Westconnex
By Kerry Barlow

The Air Quality Impact statement is in Appendix H (http://m4eis.org/category/table-of-contents/pollution/) (This will shortly be published on this site.)

Executive Summary:

- this Air Quality Impact Statement relies too heavily on the WestConnex Road Traffic Model (WRTM) forecast of reduced traffic on Parramatta Road for its claim that there will be negligible impact on the overall air quality in the vicinity of the WestConnex project; in what should have been an independent study, **the EIS needed to model a fuller range of traffic scenarios for the corridor, including possible "rat runs" used to avoid tolls and thus changing the air quality at those points.**
- the fact that the **Parramatta Road corridor has numerous traffic "hot spots", where levels of dangerous pollutants are already elevated, is glossed over,** and the dangers of adding to these "hot spots" and creating more of them is not taken into account by the overly conservative (ie optimistic) induced traffic forecasts
- there has been no modelling of estimates for any pollutants in a scenario where the traffic on Parramatta Road is more than the modelled forecast of a "53% reduction" (by 2021) along the Concord to Haberfield section.
- the new (to be endorsed) National Environment Protection (Ambient Air Quality) Measure (NEPM) standard (of 20ug/m3 for average 24-hours)should have been used, rather than the current standard (25ug/m3)
- there has been no comparison between the project and other cleaner forms of transport. In other words there has been no cost-benefit analysis.
- the EIS Statement makes no mention of the possibility of phasing out diesel fuel passenger vehicles as one way of assisting with the problem of elevated levels of PM2.5 and NO2 in the corridor

- the final length of 33kms of unfiltered tunnels could be dangerous for regular users of the full tunnel; this is especially true for motor cycle riders

Key findings from the EIS report

- the contribution of tunnel ventilation to pollutants is calculated as negligible for all receptors (ie locations where pollutants were measured)
- there will be general improvements in air quality along Parramatta Road as a result of the project, due to reduction in traffic along the road and improved dispersion of emissions from diverted traffic through tunnel ventilation outlets
- predicted concentrations of pollutants are dominated by existing background levels, both short-term readings and longer-term readings; with background concentrations particularly dominant for PM10 and PM2.5
- whilst exhaust emissions from some pollutants from road transport have decreased as legislation has tightened, over the longer term levels will start to rise again as increases in annual vehicle activity begin to offset reductions achieved by legislation and improved technology
- there are no controls or legislation for non-exhaust particles emissions, which are significant in Sydney and these will increase as vehicle activity increases
- the NSW Office of Environment and Heritage (OEH) Sydney Basin air quality monitoring stations are collecting data on PM2.5 from 3 out of 7 sites (Vol 2B, part 6, Appendix J, Table F2); the three sites show both annual mean PM2.5 concentrations and maximum 1-hr concentrations are above the advisory reporting standards of 25ug/m3 and 8ug/m3 (respectively)
- time-series for PM2.5 only available at Chullora and Earlwood; there are considerable uncertainties in measurement of PM2.5 (but has been more accurately measured since 2012 – using USEPA-equivalent monitoring)
- long-term mean nitrogen oxide concentrations at the RMS roadside sites (F1, M1 = Flat Rock Rd Kingsgrove, M5E tunnel portal) substantially higher than at the background sites at 106 and 107 ug/m3; "illustrates the ongoing contribution of NOx emissions from road transport" (Vol 2B, part 6, Appendix J, Table F2, p F-12)
- long-term trend in NO2 shows some background decreases at OEH sites, but increases or no change at several RMS urban background sites
- the ambient air quality in this part of Sydney has PM2.5 levels well above the advisory standard for both 24-hr (25ug/m3, moving to 20ug/m3) and annual (8ug/m3 moving to 7ug/m3) concentrations, judging by the readings at Edward Street Concord and the Bill Boyce Reserve Homebush and the levels at the 31 community receptors (Table K-47, p K-83). **The modelled data of forecasted PM2.5 increases and decreases shows one locality is traded against another. The top 10 ranked receptor readings, 2014 (Table K-47, pK-83) for annual mean concentrations show a range from 14.1 ug/m3 to 12.5ug/m3 (all well above the advisory standard of 8ug/m3), with the "do minimum" and "do something" scenarios still showing modelled data above the advisory standard. With the completion of all stages of the project by 2031, these modelled readings are still above the advisory standard and will be well above the recommended new standard of 7ug/m3 (to be adopted possibly by end of 2015)**

- the top 10 ranked receptor readings, 2014 (Table K-51, p K98) for maximum 24-hr concentrations show a range from 26.5ug/m3 to 24.3ug/m3 (all above the advisory standard of 25ug/m3) with the "do minimum" and "do something" scenarios still showing modelled data above the advisory standard. With the completion of all stages of the project by 2031, these modelled readings will still be above the new advisory standard (20ug/m3)
- data reported against the current standard of 25ug/m3 (24-hour average) does not give an accurate picture of the peak hour traffic emissions, which would be well above the standard; the fact that children are walking to school near several of these sites in the morning peak hour means they are being daily exposed to dangerous emission levels. If their classrooms are also located near the sites with elevated emissions, they are exposed for lengthy periods. Dobroyd Point and Haberfield Public Schools will be particularly affected, and Homebush Public School slightly less so.
- the thirty one community receptors used to indicate changes to emission levels at 2021 and 2031 already show levels of PM2.5 are above the new proposed NEPM standard of 20 ug/m3 (24 hour average), with most sitting just below the current standard (25ug/m3) (page K100). If the WestConnex project induces more traffic to the area by 2031 (or the population grows faster than planned or more diesel vehicles use the road or tunnel) then PM2.5 levels will be well over the current standard, let alone the new standard

Flaws in the methodology of the EIS report

- relies on the traffic modelling for its claim receptors will, generally, be improved – this traffic modelling did not include a scenario where traffic on Parramatta Road is greater than model estimates. Independent experts are predicting that this will be the case.
- the WRTM traffic forecasts rely on the Bureau of Transport Statistics (BTM) population model, which uses the main inputs from the Department of Planning and Environment's (DP&E) 2014 NSW population, household and dwelling projections and Australian Bureau of Statistics' (ABS) 2011 Census data on population and dwellings. The model makes adjustments to incorporate known major developments and future plans. Given that the EIS uses BTM data from 2013, before the Parramatta Road Renewal Plan was released, the model may not allow for an estimated additional 40,000 units (80,00 – 100,000 people) along the Parramatta Road corridor, most of whom will own at least one vehicle.
- the estimations for "induced demand" in traffic (claimed as between 2%-7% – Vol 2A, Traffic and Transport Assessment, p4-6) are very conservative, given they rely on population forecasts which may underestimate population growth along the corridor (collected prior to the Parramatta Road Renewal Plan)
- the planned height of the ventilation stacks is not modeled to show other scenarios, including effects of greater heights on dispersal of pollutants; there is a lot of international research that indicates a greater height of stack results in better dispersion
- the model claims the data from the OEH monitors and the WDA St Lukes Park Concord (M4E:05) is representative of the air quality of the project; the data from the other 4 WDA (road-side) monitoring sites is down-played, yet there are currently many residents living within 200-300 metres of these "hot spots"
- the statement seems to downplay the key findings from the Human Health Risk Assessment (Volume 2D, Appendices J-L) including:

by 2021, without the project, the maximum (residential and commercial) 1-hour concentration of NO2 estimated to be (in micrograms per cubic metre) 375ug/m3 and 360ug/m3 (respectively) – which is well above the guideline (of 246ug/m3); with the project completion, the levels estimated as 307ug/m3 and 286ug/m3 (respectively) – still well above the guideline

by 2021, without the project, the maximum (residential and commercial) 24-hr average concentration of PM2.5 estimated to be 29.3 ug/m3 and 30.5ug/m3 (respectively) – which is significantly above the guideline (25ug/m3); with the project completion, the levels estimated as 28.2ug/m3 and 26.6ug/m3 (respectively)-still above the guideline

by 2031,with the project, PM2.5 levels estimated as above the guideline

by 2021, without the project, the maximum (residential and commercial) 24-hr average PM10 concentration estimated as 54ug/m3 and 55.4ug/m3 (respectively) – above the current guideline (50ug/m3) and well above the recommended (from the 2014/15 review) of 40-50ug/m3

by 2021, with the project, the maximum (residential and commercial) 24-hr average PM10 concentration estimated as 52 ug/m3 and 50ug/m3 (respectively) – above both the current guideline and recommended (review) guideline

by 2031, both without and with the project, PM10 will be above both guidelines

- the claim there will be no emissions from portal sites is questionable, given that any congestion on the feeder road into a portal entrance or the exit point will produce concentrated sites of emissions
- Bureau of Metereology data from Canterbury Racecourse is used to model the atmospheric conditions for dispersion of the plume at Wattle Street Haberfield; this may not be appropriate, given the location of the very large Parramatta River to the East of the stack and thus different terrain compared to Canterbury; more suitable local data should have been collected for such a major project

Flaws in Model's Assumptions

- the benefits from the project, in terms of some reduced pollutant concentrations at particular points (as shown on contour maps (Fig K-98, K-99, K- 100), depend on completion of stage 3 of the project, which may not eventuate if tolling of stage 1 does not meet estimated revenue. **If stage 3 is not completed, the levels of PM2.5 throughout many parts of Haberfield, Ashfield and Leichhardt will exceed current advisory and new standards.**

- the overall benefits rely on the traffic on Parramatta Road being significantly reduced, as claimed in the EIS. The WRTM traffic model depends on the BTR population forecasts (which use ABS Census of Population & Housing data) and the toll-resistance modelling estimations. Traffic forecasting is a major issue in Australia, given the number of projects

with significantly incorrect forecasts of volume, including the Brisbane N-S By-Pass, Sydney Cross City Tunnel, Brisbane Connections, Lane Cove Tunnel and East-Link Melbourne. As the Australian Bureau of Transport and Communication Economics, Canberra states, traffic models are … "radical simplifications of real urban systems" (cited in Black, J (2014) Traffic Risk in the Australian Toll Road Sector, Public Infrastructure Bulletin, Vol 1, Issue 9, Art 3). **So all the claims of improvements in overall air quality, or at best negligible impacts on air quality, are reliant on the accuracy of the traffic modelling.** As Black (ib id, p5) shows, the eight most recently built toll-roads in Australia have all had significant underestimation of traffic volumes by an average ratio of .48 (total traffic from the 8 projects forecast as 945,286 vehicles, but actual volume was 455,939 vehicles). The WDA must be very optimistic that this project will be the first one in many years to get the traffic forecasts correct. The problem is that local residents lives are about to be severely interrupted and possibly have the air quality worsened if this project attracts more traffic than estimated onto the surface roads, particularly Parramatta Road. Following a review of local and international reports and data, the Australian Department of Infrastructure and Transport, Bureau of Transport and Regional Economics (BITRE) in its Review of Traffic Forecasting Performance Toll Roads (2011) sets out what it sees as the major sources of errors in toll road forecasting. These errors include both technical (inadequate models, data limitations, unrealistic model input assumptions and ramp-up risk) and non-technical (optimism bias and strategic misrepresentation) sources of errors. Given that the Project Manager of the WDA stated at an Ashfield Council Forum (23/09/2015) that a key element of the business case for the project is .."as an enabler for the Parramatta Road Renewal Plan", one would have to wonder whether the traffic forecast that the M4 will reduce surface traffic on Parramatta Road by 53% by 2021 is an error of misrepresentation (to cite the BITRE classification of errors). The robustness of the WRTM model is crucial to the claims that the air quality will not be adversely affected by the project, and this Air Quality Report should have included a worst-case scenario of more than projected traffic on Parramatta Road.

- this assessment ignores the fact that the air quality standards or guidelines used in the EIS may be superseded by stricter ones at the end of 2015 when the new National Environment Protection (Ambient Air Quality) Measure (NEPM) standards are passed
- this assessment appears to ignore some of the actions recommended in the new National Clean Air Act, including initiatives to reduce localised emissions. **This WestConnex project will not only increase levels of NO2 and PM2.5 at several community receptors, it also runs the risk (if estimated traffic flows are greater on Parramatta Road than predicted) of increasing these levels across the Corridor.**

- five air quality monitors have been collecting data for about eight months, yet the WDA has only very recently posted three months of data (June/July/Aug 2015) on the website. The data indicates there were exceedences of PM2.5 as follows:

  o 6 occurrences at Wattle Street (the maximum one on 7 June being 9.4ug/m3 above the average 24-hour standard of 25ug/m3); 2 occurrences at Concord Oval (maximum one 30 June, 11ug/m3 above standard)
  o 2 occurrences at Concord Oval (maximum one on 5 July 1.5ug/m3 above standard)
  o 1 occurrence at Wattle Street (21 Aug 12.9 ug/m3 above standard); 1 occurrence at Edward St (21 Aug 10.8ug/m3 above standard); 1 occurrence at Bill Boyce Res (21 Aug 11.9ug/m3 above standard); 1 occurrence at Concord Oval (21 Aug 14.8ug/m3 above

standard); 1 occurrence at St Lukes Pk (21 Aug 8.6ug/m3 above standard) – there was back-burning in national parks in Sydney on 21 Aug which would account for higher readings, but it shows that the air quality is readily affected in these parts of Sydney which have already elevated readings; **once the new NEPM is adopted (20ug/m3), there will be many more average 24-hour readings for the WestConnex corridor that will exceed the standard**

- This assessment appears to ignore some of the actions recommended in the new National Clean Air Act, including initiatives to reduce localised emissions. This WestConnex project will not only increase levels of NO2 and PM2.5 at several community receptors, it also runs the risk (if estimated traffic flows are greater on Parramatta Road than predicted) of increasing these levels across the Corridor. This project will not be future-proofing Sydney.

(Ed:This post was updated on October 31,2015)

For other posts relevant to Air Quality read Westconnex (http://m4eis.org/2015/10/15/environmental-justice-westconnex-and-air-pollution/) and Air Pollution from Environmental Justice and the Critique of the Health Risk assessment (http://m4eis.org/2015/10/11/critique-of-m4-east-tunnel-eis-human-risk-assessment/), also by Kerry Barlow

Blog at WordPress.com (https://wordpress.com/?ref=footer_blog). The Big Brother Theme (https://wordpress.com/themes/big-brother/).

A People's M4 EIS

Environmental Justice : Westconnex and Air Pollution

15/10/201525/10/2015 wendybaconblog Commentaries & Objections Air pollution, Environmental Justice. Air quality, Induced traffic, Particle Pollution, PM10, PM2.5

This submission from Environmental Justice Australia (https://envirojustice.org.au/) provides an important analysis of WestConnex and air pollution
It is based on an Analysis of Appendix H: Air quality impacts (http://m4eis.org/category/table-of-contents/pollution/air-quality/)

Context

Air pollution kills more Australians than car crashes. More than 3,000 people die prematurely each year from air pollution. Particle pollution is the largest contributor to this health toll, causing respiratory disease, hospital admissions, asthma attacks and premature death.

Diesel emissions are significant sources of fine particle emissions. Diesel-powered passenger cars and light commercial vehicles (LCVs) are rapidly increasing as a proportion of the NSW vehicle fleet. In coming years, they will represent a growing proportion of traffic in the WestConnex catchment.

The health costs of particle pollution in Sydney are estimated to be approximately $4.7 billion each year, with most of this health impact attributable to long-term exposure to PM2.5. Motor vehicles are a significant contributor to these fine particles, accounting for between 12-17% of total PM2.5 emissions.

New pollution standards and their application to WestConnex

Australia's nine environment ministers representing the states, territories and Commonwealth, are currently revising the national standards for particle pollution. The NSW Government is leading this process and released an Impact Statement for comment in August 2014, presenting the costs and benefits of various options for these new standards.

At their 14 July meeting this year, ministers agreed in principle to new standards for PM2.5. At their December meeting, ministers are expected to finalise new standards for both PM10 and PM2.5. The table below compares current Australian standards to the standards currently being considered, and to the standards that are referenced in the WestConnex EIS (Appendix H, p.48).

	$PM_{2.5}$ 24 hour average	$PM_{2.5}$ Annual average	PM_{10} 24 hour average	PM_{10} Annual average
Current standard	25µg/m³	8µg/m³	50µg/m³	n/a
Proposed NEPM standards	15, 20 or 25µg/m³	6, 8 or 10µg/m³	30, 40 or 50µg/m³	12, 16 or 20µg/m³
Standards referred to in WestConnex EIS	25µg/m³ (and a 'target' of 20µg/m³)	8µg/m³ (and a 'target' of 7µg/m³)	50µg/m³	30µg/m³

(https://m4eis.files.wordpress.com/2015/10/james-table1.jpg)

(This table will be enlarged soon. In the meantime, click on it to see a bigger image.)

The case for stricter standards outlined in the Impact Statement is compelling: "Decreasing short-term exposure to PM10 would reduce attributable hospital admissions for childhood respiratory disease and pneumonia/bronchitis in people aged 65 and above." Reducing PM10 concentrations to 40µg/m3 is predicted to reduce health impacts in Sydney by around 50%. Meeting the proposed PM2.5 standard of 6µg/m3 nationally would prevent approximately 530 deaths.

The WestConnex EIS (Appendix H, pages 36-37) reveals that the NSW EPA has sought the endorsement of the NSW Cabinet for an annual average PM10 standard of 25µg/m3. This would allow significantly higher pollution concentrations than any of the three options for the standard that are advocated in the Impact Statement prepared by the NSW EPA to guide the variation of these standards. It is important to note that the ministers will determine the new standard collectively. This is not a decision that will be made by the NSW minister alone. There is no reason to expect the standard proposed by the NSW EPA will be endorsed by other states or adopted nationally. It should not be used to assess the impacts and viability of this project.

The EIS (Appendix H p.48, Tables 7-5 and 7-6 on p.76. p.151 and elsewhere) interprets annual average PM10 levels in terms of a standard of 25µg/m3 and a 'target' (10-year objective) of 20µg/m3, ignoring the strong case for stricter standards and the fact that a decision has not yet been made regarding the new PM10 standards.

Similarly, the EIS assumes that the standard for 24-hour average PM10 concentrations will remain unchanged. On page 151, the EIS acknowledges that, "The maximum 24-hour mean PM10 concentrations at the 31 community receptors with the project in 2021 and 2031… At all receptor locations the maximum concentration was below – but close to – the NSW impact assessment criterion of 50µg/m3." If (as expected) a stricter national pollution standard or 30 or 40µg/m3 is adopted in December, it will already be significantly exceeded along the Westconnex route.

Recommendation: Assessment of the environmental and health impacts of the proposed motorway should be based on the strictest standards currently being considered by Australia's environment ministers, not on standards that are significantly less strict.

Existing air pollution levels and the need for action to improve air quality

Particle pollution levels along the proposed WestConnex route are at or above current standards, and well above proposed standards.

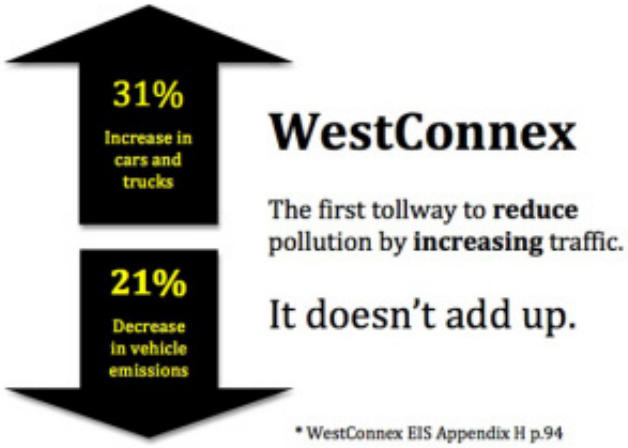
The EIS (p.66) states that annual PM2.5 concentrations measured in 2014 in the study area were "very close to or above" the current advisory reporting guideline (noting that the new national standards is expected to include a stricter target of 7μg/m3 to be achieved over 10 years). Current 24-hour average concentrations of PM2.5 are "close to or above" the current NSW reporting standard of 25μg/m3 and well above the likely national target of 7μg/m3.

This is also true of coarse particle (PM10) pollution levels. Figure 8-54 (p,149) identifies several locations along the WestConnex route where annual average PM10 concentrations are already above 20μg/m3 (in the range 20-24μg/m3). Similarly. Figure 8-62 (p.155) identifies large residential areas adjacent to the M4 Western Motorway and A6 (Olympic Drive) where PM10 concentrations are already above 20μg/m3.

Figure 8-56 (Appendix H p.151) forecasts the maximum 24-hour mean PM10 concentrations at 31 'community receptors' in 2021 and 2031. At all these receptor locations the maximum concentration was "below – but close to – the NSW impact assessment criterion of 50μg/m3".

Particle pollution levels near the motorway already exceed the current PM10 and PM2.5 standards. Construction and operation of WestConnex will increase pollution concentrations and adverse health impacts.

Recommendation: The NSW Government needs to prevent any additional sources of fine particle pollution and to actively manage existing polluters.



(https://m4eis.files.wordpress.com/2015/10/james-graphic.jpg)

The myth that building roads can improve air quality

The WestConnex proponents allege (Appendix H, Figure 5.2, page 50) that WestConnex will improve air quality. Building and expanding motorways increases air pollution.

Motorways induce traffic. The EIS assumes a 31% increase in vehicle kilometres travelled (vkt) in the WestConnex domain (p.94). Increasing road capacity will directly increase vkt. As a result, air pollution worsens.

The EIS predicts that PM2.5 emissions in the WestConnex domain will decrease by 21% while vkt increases by 31% (Table 8.6 p.94), from 234 tonnes per annum in 2014 to 182 tonnes in 2031. Similarly, the EIS predicts a reduction in PM10 and PM2.5 emissions from the M5 East tunnel stack.

Across Sydney, ambient concentrations of PM2.5 and PM10 are increasing. This compels the NSW Government to act to improve air quality and take all available measures to reduce particle emissions.

The prediction that constructing WestConnex can reduce emissions is based in part on the assumption that the motorway will ensure that traffic moves faster and more freely. In reality, many motorways become congested more rapidly than expected, due in part to induced traffic.

James Whelan
Researcher
Environmental Justice Australia
[redacted]

(https://m4eis.files.wordpress.com/2015/10/logo.jpg)

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Begg S, Vos T, Barker B, Stephenson, C., Stanley, L. & Lopez, A.D. The burden of disease and injury in Australia 2003, Australian Institute of Health and Welfare, Cat. no. PHE 82, Canberra (2007), p234. http://www.aihw.gov.au/WorkArea/DownloadAsset.aspx?id=6442459747 (http://www.aihw.gov.au/WorkArea/DownloadAsset.aspx?id=6442459747)

National Environment Protection Council, July 2014, 'Impact Statement: Draft Variation to the National Environment Protection (Ambient Air Quality) Measure', p.xi.

The WestConnex M4 EIS suggests that motor vehicles were responsible for 12% of PM2.5 emissions in Sydney in 2011. The Australian Motor Vehicle Emissions Inventory estimates that motor vehicles were responsible for 17% of PM2.5 emissions nationally in 2010.

NEPC, July 2014, 'Impact Statement: Draft Variation to the National Environment Protection (Ambient Air Quality) Measure'.

NEPM Impact Statement, p.xviii

NSW Chief Scientist, 2014, Advisory Committee on Tunnel Air Quality, p.6 http://www.chiefscientist.nsw.gov.au/__data/assets/pdf_file/0003/52986/Road-Tunnels_TP02_Air_Quality_Trends_in_Sydney.pdf (http://www.chiefscientist.nsw.gov.au/__data/assets/pdf_file/0003/52986/Road-Tunnels_TP02_Air_Quality_Trends_in_Sydney.pdf)

More commentary on Westconnex Health Risks to use in submissions here (http://m4eis.org/2015/10/11/critique-of-m4-east-tunnel-eis-human-risk-assessment/)

Support and submissions

Here's how you can support (https://envirojustice.org.au/blog/i-support-clean-air-laws) Environmental Justice Australia's work for stronger pollution laws

Would you like to make a submission to the M4 East EIS about air quality issues?

Remember you can make more than one submission.

Submissions can be sent to the Sec of DP&E, quoting project number (SSI 6307). Submissions received will be published on the DP&E website but only after the end of the exhibition period.

Written submissions can be made online via the Department Planning website http://majorprojects.planning.nsw.gov.au (http://majorprojects.planning.nsw.gov.au) or sent to:
SSI 6307
NSW Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Blog at WordPress.com (https://wordpress.com/?ref=footer_blog). The Big Brother Theme (https://wordpress.com/themes/big-brother/).

A People's M4 EIS

Environmental Scientist finds more work needed on noise and vibration EIS

30/10/201531/10/2015 wendybaconblog Commentaries & Objections noise, demolition, vibration, SLR Consulting, INCG, construction noise management levels, SEARS

Comments on Noise and Vibration Assessment

SLR Consulting was hired by Westconnex to conduct an assessment of the noise and vibration impacts of the Westconnex. Its report can be found in Chapter 10 of Volume 1A from 10.1 onwards (https://m4eis.files.wordpress.com/2015/09/m4_east_eis_volume_1a_part_5.pdf) continued at 10-3 -10-47 [here](10-3 -10-47) and also in Volume 2C, Appendix I (http://m4eis.org/category/table-of-contents/noise-and-vibration/).

Noise could have a long term impact on those who would live beside the proposed M4 East or in local streets and roads carrying extra traffic nearer tunnel exits and on 'rat runs'. Construction noise from demolition, thousands of truck movements a day and rock crushers would impact on local communities and businesses. In some situations this could occur for several years. In others, the impact would be over shorter periods. Research has shown that noise does have negative effects on health (http://www.noiseandhealth.org/article.asp?issn=1463-1741;year=2004;volume=6;issue=22;spage=5;epage=13;aulast=Ising). Vibration from construction including tunneling could cause cracked walls. Westconnex has already begun warning residents of this risk.

The SLR report does recommend noise mitigation for some buildings, although only up to the first story. It recommends noise walls and other strategies that would reduce the noise. Some buildings on Parramatta Rd that would under normal circumstances be offered noise protection would be left exposed so that the land between these buildings and the motorway can later be developed.

In the absence of that we asked an environmental scientist to review the material in Chapter 10 in the EIS . For personal reasons to do with her employment, we cannot publish the environmental scientist's name.

It's worrying that there are many gaps in the EIS and much is also left to future decision making during the final design phase. There are many issues here that need following up.

The EIS reports are presented in ways that even make it difficult for residents to see whether their neighbourhoods would be affected by excessive noise levels or not. While it's expected that technical data can be hard to understand, the summary chapter should be presented in a more accessible way. This is just one of the reasons why residents want more time for the consultation period so that they could hire their own independent consultants. We can safely say that the EIS shows that hundreds of homes and thousands of residents would be affected by noise either during the 3 year long construction period or after the opening of the tunnel should it be allowed to proceed.

If you are worried about this issue and cannot understand the EIS. we suggest asking your local Council to arrange for it to be fully explained.

Overall conclusion

Given the uncertainty raised in a range of areas of the noise and vibration assessment and the number of potentially impacted properties and people within the project area, further work needs to be done to ensure the local community and other affected stakeholders are provided with a fully informed assessment. This must occur **as part of the EIS consultation process** where further comment can be sought from the community, and not simply resolved through the Submissions Report which does not allow any further input from the community.

Gaps in Westconnex EIS analysis.

Deficiencies in reporting of noise monitoring results

Table 10.2 does not provide information on what times of day, evening or night the noise levels presented for the attended noise monitoring was undertaken. If the purpose of the attended monitoring was to support the data gathered through unattended monitoring, then attended noise monitoring results for each of these time periods should be provided.

Construction noise management levels

Table 10.3 states out that the noise management levels (NMLs) for construction works during standard hours should be the rating background level (RBL) +10dBA and the rating background level +5dBA for out of hours works (based on the Interim Construction Noise Guideline (http://www.epa.nsw.gov.au/resources/noise/09265cng.pdf) (INCG), however not all of the NMLS for the project have been accurately calculated in Table 10.4 when compared to the measured INCG RBLs in Table 10.2.

For example:
INCG RBLs for monitoring location L23 are 53dBA (day-time), 52dBA (evening) and 46dBA (night-time) which should make the out of hours NMLs for this location 58dBA (day-time), 57dBA (evening) and 51dBA (night-time), however the night-time NML in this table is shown as being 54dBA

INCG RBLs for monitoring location L22 are 53dBA (day-time), 53dBA (evening) and 49dBA (night-time) which should make the out of hours NMLs for this location 58dBA (day-time), 58dBA (evening) and 54dBA (night-time), however the NMLs shown in this table are 66dBA (day-time), 62dBA (evening) and 47dBA (night-time)

There are other inaccuracies in the calculations given and this whole section needs to be reviewed and amended as necessary. This would then need to be compared against the data predicting exceedences of the NMLs to ensure that these are based on accurate NMLs.

Given the significant predicted noise impacts discussed in later sections of the EIS, this is absolutely critical to get right so that the local community can make an informed decision about what the potential noise impacts are likely to be.

Sleep disturbance during construction

Page 10-11 states that a sleep disturbance NML of 55dBA LAFmax (internal) and 65DBA LAFmax (external) has been adopted, however Table 10.4 provides varying sleep disturbance NMLs for each noise catchment area and does not specify whether the sleep disturbance NML is internal or external.

** Page 10-29 summarises that Tables 10.14 to 10.19 show that sleep disturbance criteria are predicted to be exceeded during all construction scenarios that are proposed at night and notes that the INCG only requires consideration of maximum noise levels when more than two consecutive nights are proposed. More detail on how potential sleep disturbance would be managed must be included in the EIS given the proposal to conduct such extensive out of hours works as identified throughout this section of the EIS.**

Construction vibration

In s10.3.2 on page 10-15 there is discussion about the application of blast vibration criteria with a statement:

"For projects such as this, with a shorter duration of blasting of 12 months or less, a higher vibration criterion may be reasonable. For this project, the location of the blast moves along the alignment such that any one receiver is affected for only a short period of time."

With no detail given about how long 'a short period of time' is, there is no way to determine whether it is appropriate that a higher vibration criterion be permitted, irrespective of whether or not the referenced standard was developed for mining operations rather than road tunnel construction. Given the range of sensitivities to vibration within any one community, it would be more appropriate to apply a conservation measure in the first instance.**

In s10.3.2 the control of damage from air blast is discussed and there is a statement that:

"Nominating appropriate criteria for heritage buildings generally require site inspections; this would be confirmed during detailed design."

The SEARs state that the EIS must "include an environmental risk analysis to identify the potential environmental impacts associated with the infrastructure" and "where relevant… must include…measures to avoid, minimise and if necessary, offset the predicted impacts, including detailed contingency plans for managing any significant risks to the environment."

If nominating appropriate criteria for the control of damage from air blast requires further site inspection then this should be conducted as part of the EIS process in order to meet the requirements of the SEARs as referenced above. Delaying this until detailed design, the completion of which would realistically occur some time after the commencement of construction should the project be approved, is not adequate given the potential impacts to the heritage and the concerns about this in the community.

Table 10-23 shows a total of 203 residential and light commercial buildings, 238 typical buildings, 11 heritage listed and 13 structurally unsound buildings are within safe working distances of highest vibration plant for cosmetic damage. 493 buildings are within the human response criteria for vibration. Additionally, three more properties are within the safe working distance for human response due to proposed tunneling activities.

This is a large number of buildings that are going to be placed at risk of cosmetic damage and an even more significant number of buildings within which people would be at risk of experiencing adverse effects from vibration. The number of buildings predicted to be impacted by vibration is worrying, particularly for the human response criteria as this impacts on the health and wellbeing of residents.

Page 10-35 refers to a detailed analysis of the potential vibration impacts needing to be undertaken for locations where the predicted and/or measured vibration levels are greater than the nominated screening levels, but no timeframe is supplied for this. Similarly, s10.4.5

discusses the need for further investigation into predicted noise and vibration levels after confirmation of the scope of blasting to determine whether or not the cosmetic damage and human comfort criteria would be met.

Given the significant numbers that are predicted to experience vibration impacts, both of these analyses should be undertaken as part of the EIS process so that the local community and potentially impacted residents can make a fully informed opinion on the proposed project.

The proposed management measures in this EIS are also not adequate to mitigate the potential vibration impacts on such large numbers of receivers as they do not discuss ways to reduce or eliminate vibration impacts or provision of respite. More rigor should be applied to determining the exact extent of potential impact and what would be done in a practical sense to ensure that people and buildings are not exposed to potentially damaging levels of vibration.

Demolition of buildings

Table 10-13 shows that in 13 NCAs exceedences of the NMLss are predicted to be up to or more than 25dBA during day-time works. Given the RBLs are 10dBA less than the NMLs, then this means that over half of the NCAs would experience noise levels of up to or more than 35dBA above the existing background level during demolition. **The Transport for NSW Construction Noise Strategy referenced on page 10-5 of the EIS categorises this level of noise impact to be "highly intrusive" as it uses the rating background level as the starting point for determining exceedences.**

What is proposed to mitigate noise impacts associated with demolition? As a minimum, highly affected receivers should be offered respite (accommodation elsewhere paid for during construction period.)

Work area establishment

Table 10-14 shows exceedences of up to or more than 25dBA above the NMLs are predicted for work areas establishment in 14 NCAs during standard daytime hours, with exceedences of more than 25dBA predicted for all but two sets of receivers during out-of-hours works. **These exceedences are excessive and would have a significant impact on nearby receivers.**

Construction facilities

Table 10-16 shows that operation of construction facilities is predicted to significantly exceed NMLs during night-time operations, including exceedences of 50dBA or more in 4 NCAs and 11 NCAs that are predicted to exceed night-time NMLs by 30-50dBA. This represents a significantly intrusive impact to residents and night-time operations should not be considered reasonable for residents to have to endure in these locations.

Road construction

The opening paragraph on road construction states that new road works would be undertaken within the construction footprint, however out of hours works would be likely to minimise impacts to traffic and reduce safety risks for workers. If the works are being conducted entirely within the construction footprint, then why would there be potential impacts to traffic and workers safety? Does this actually mean that new road works would be undertaken within areas that are currently in use for road operations?

Table 10-17 shows that exceedences of over 25dBA above the NMLs are predicted for the majority of NCAs for all time periods during road construction works. Given the significance of this level of exceedence, more detail should be provided about exactly how much over 25dBA predicted exceedences are for each of these time periods. The information presented in the table indicates that the majority of the NCAs would experience high noise impacts (at the higher end of "moderately intrusive" as defined by the TfNSW CNS) for the duration of road works. This represents a significant burden on the local community, particularly during out of hours works when sleep disturbance is likely.

Tunnelling

Tunneling is proposed to be carried out 24 hours a day, seven days a week and some above ground tunnel construction ancillary facilities would also be in use 24 hours a day, seven days a week to support tunneling works. Page 10-28 states that:
"NMLs for residential properties located close to the tunnel construction ancillary facilities are predicted to be exceeded by more than 25dBA during the night-time periods. These exceedences would be restricted to residential properties directly adjacent to tunneling sites. Where exceedences are expected, properties would be considered for construction mitigation."

Even with the proposed installation of acoustic hoarding and the assumption that this would afford a 10dBA reduction in noise levels, there would still be residential receivers who would experience exceedences of more than 25dBA above the NML, as shown in Table 40 of Appendix I.

It is unacceptable to expect residents to be subjected to such potentially high noise levels 24 hours a day, seven days a week as this provides no respite from noise, light, dust and traffic impacts. It is also noted that the statement above gives no certainty about whether or not

mitigation would actually be implemented, merely considered.

(https://m4eis.files.wordpress.com/2015/10/img_3544-1.jpg)

Residents studying the EIS while questioning the legality of early drilling in Haberfield

Highly noise affected residential receivers

Table 10.21 shows more highly noise affected receivers after acoustic hoarding is installed in NCA 13 and NCA 21– why is this? Installation of acoustic hoarding should reduce the numbers of impacted receivers, not increase.

Ground-borne noise

Section 10.4.2 indicates that there are a number of locations within 40 metres of tunneling works where the criteria for ground-borne noise would be exceeded in both the evening and night-time. While it is mentioned that the duration of these impacts would be a relatively short period of time at each location, there is no discussion on what mitigation would be implemented to reduce the impacts on the directly impacted residents. Given exceedences are predicted for the time periods that people are more likely to be at home and trying to sleep, this is not adequate.

Construction traffic noise

Given that spoil removal and concrete delivery are proposed during the night in s10.4.3, with potential impacts at Short Street East, the fact that detailed assessment of potential maximum night-time noise events on local roads has not yet been undertaken is inadequate and does not allow affected residents in this area to be able to determine what the potential impacts on them are.
The reference to sleep disturbance in s10.4.3 is disingenuous as it only refers to light vehicles whereas sleep disturbance is more likely to be caused by heavier vehicles that would be undertaking night-time spoil removal and concrete delivery.

Operational noise and vibration impacts from ventilation facilities

Table 10-28 and the text below it shows that modelling has not been undertaken to predict potential operational impacts from the three proposed ventilation facilities. This does not allow potentially affected receivers to be able to make an informed opinion on what the impacts may be.
Is it known whether or not the proposed maximum allowable sound power level for these facilities is achievable? What is the process if it is not?

Operational noise impacts and mitigation

Page 10-37 states that:
"…the project is predicted to result in an overall reduction in the number of receivers where exceedences of the noise criteria are experienced….This reduction is a result of reductions in the numbers of vehicles using some surface roads…
Large reductions in noise levels (up to 8dBA) have been identified…due to a reduction in the number of vehicles using the surface M4…"

A reduction of up to 8dBA while noticeable, would not necessarily be clearly audible, and as such is better described as a moderate reduction rather than large. The predicted "increases in noise levels (up to 16dBA)" are however more accurately described as large when they are at the upper end of being clearly audible.

The predicted reductions are based on the traffic modelling for the project undertaken on behalf of a proponent with a vested interest in undertaking road projects and as has been seen in a number of other large road infrastructure projects in Sydney in recent years, inaccuracies in traffic modelling can have disastrous impacts on the viability of a project on completion and on the community who are left shouldering the burden of such infrastructure in their local environment. This, combined with the fact that predicted increases in operational noise impacts are significantly higher than the predicted reductions in other areas, does not provide ample evidence that the project is justified.

Seven new or increased height noise barriers are proposed as part of the project. Some of the new noise walls are proposed to be 5m or 6m high which has the potential to significantly impact on the amenity (visual impact and overshadowing) of residential properties that are immediately adjacent to the proposed noise walls. Even with construction of these noise walls and the installation of low noise pavement, a large number of receivers (310) would still need consideration of additional mitigation. At-property treatment for noise mitigation, while being able to help achieve operational noise goals, also means that people are restricted in being able to open their windows without experiencing noise impacts, so can have a significant impact on the amenity of their property. The number of receivers that may need further at-property treatment is very high and further work should be done on the design and/or alignment of the proposal to reduce this number to a more acceptable level.

Table 10.24 shows number of receivers still affected operational traffic noise with mitigation installed in a number of scenarios. As this table uses different terminology to that of the scenarios at the beginning of the noise and vibration assessment on page 10-6 of the EIS, a direct comparison is made more difficult and it can only be assumed that the four scenarios presented in Table 10.26 are meant to mirror those given on page 10-6. There is also confusion caused by the explanatory text above this table that refers to data about numbers of affected receivers in scenarios without mitigation that is not shown in the table. The EIS should clearly communicate what the predicted operational impacts are likely to be and it does not do that.

The assessment of maximum noise levels discussed on page 10-42 indicates that there are a number of locations where the maximum noise level would increase but that not all of these potentially affected receivers would be eligible for property treatments. As some of these receivers would also be in line of sight to elevated vehicle exhausts, this is not an adequate response to a potential increase in maximum noise levels and impacts to health, wellbeing, visual amenity and air quality.

Environmental management measures

A number of environmental management measures for noise and vibration are proposed in the EIS. Of particular concern are the following:

NV6

"Permanent noise barriers will be scheduled for completion as early as possible in order to minimise construction noise"

NV7

"Property treatments identified for the operational phase of the project will be considered for installation before or early in the construction period, where they would improve noise levels"

Given the number of areas where the EIS delays the detailed assessment of noise and vibration impacts, presumably until after project determination, it is most likely that construction would commence well before information is available to base noise barrier design on, let alone construct them. Detailed noise and vibration assessment should be included in the EIS rather than deferred to after the project has been assessed and determined so that a more accurate picture of what is proposed is presented to the community for consideration and so that management measures such as these can be realistically implemented.

NV10

"Night works will be programmed to minimise the number of consecutive nights that work affects the same receivers, where feasible. This would not apply to civil and tunnel sites."

The proposal to undertaken tunneling activities 24 hours a day, seven days a week is inconsistent with this management measure, particularly given the need for supporting tunneling facilities to be utilized at the same time. The exemption of civil and tunnel sites covers a significant portion of the project works, making this exemption almost universal.

Out of hours/night works should only be undertaken when it can be demonstrated that no other options are safe or the impacts to the surrounding receivers are absent or minimal. This is not the case being presented in this EIS and therefore more stringent limits on out of hours works should be applied, rather than more lenient as being proposed here.

NV11

"When working adjacent to schools, particularly noisy activities will be scheduled outside normal school hours, where practicable."
While this proposed management measure is positive for schools, it also has the potential to increase the need for out of hours works and therefore must be considered in conjunction with other proposed management measures that relate to out of hours works. Given there are areas within the project's influence that may be subjected to prolonged and/or noise out of hours works, a balance needs to be struck between impacts to schools and impacts to residential receivers.

NV24

"Respite periods (eg one hour respite for every three hours of continuous construction activity) will be scheduled for high noise impact works where appropriate"
The EIS does not state that respite periods will be used for properties impacted by 24 hour, seven day a week tunneling activities, however these are likely to be the most highly impacted due to predicted noise levels and duration of works.

NV27

"As far as practicable, construction vehicle movements along local roads at night will be restricted to light vehicles only, subject to further investigation of potential night-time maximum noise levels during detailed design."

NV29

"Spoil removal will be undertaken during the day as far as practicable"
These measures are inconsistent with information discussed above, and NV28 below, which states that spoil removal and concrete delivery will occur at night. Spoil removal and concrete delivery will be undertaken with heavy vehicles so statements about restricting night-time movements to light vehicles is

NV 28

"As far as practicable, heavy vehicle movements outside of standard construction hours associated with tunnel support works (spoil removal, concrete delivery and other heavy vehicle movements) will be limited to access and egress directly to and road network"

This needs further discussion on the numbers and location of potentially affected receivers within the EIS itself rather than this imprecise management measures.

NV31

"The safe working distances will be complied with where feasible and reasonable. This will include the consideration of smaller equipment when working close to existing structures."

As outlined above, it is already known that there is a large number of buildings that would fall within the safe working distances, making the commitment to comply where feasible and reasonable meaningless in these areas. Smaller equipment should be specified, not just considered.

NV 32

"If vibration intensive works are required within the safe working distances, vibration monitoring or attended vibration trials will be undertaken at the outset of these works to ensure that levels are within the relevant criteria."

This management measure gives no assurance that vibration intensive works would not be carried out within safe working distances. Vibration monitoring once vibration intensive works have commenced is not appropriate given this in itself could cause damage and/or human discomfort.

NV44

"Once plant items within the ventilation building are confirmed during detailed design, impacts will be assessed with consideration of the INP modifying factors. Where modifying factors are found to be applicable they will be added to the assessment, and compliance with the INP criteria checked at all receivers."

This management measure is specified as to be undertaken during pre-construction, however given it references detailed design, there is more likelihood that it would occur well after construction has commenced. As discussed above, there should be a specified process for how to manage non-compliances with the criteria prior to commencement of operation.

How to make an objection: http://m4eis.org/2015/09/11/how-to-object/ (http://m4eis.org/2015/09/11/how-to-object/)

Blog at WordPress.com (https://wordpress.com/?ref=footer_blog). The Big Brother Theme (https://wordpress.com/themes/big-brother/).

A People's M4 EIS

Major flaws in Westconnex EIS Biodiversity study

24/10/201525/10/2015 wendybaconblog Commentaries & Objections Biodiversity, Green space, Grey-headed Flying-foxes, Micro-bats, Open space, Parkland, Private gardens, Superb Blue Wren, Threatened fauna, Vegetation

Biodiversity effects are defined narrowly in focusing on potential impacts on Threatened Species.

By Debra Little

Methodology and EIS statements re “the highly modified nature of the project footprint” (20-14)

Typically an EIS downplays or dismisses the habitat value within a project footprint in order to remove or limit the biodiversity-promoting value that is there, and/or to understate the impacts of the project. This EIS is no exception.

The EIS field surveys (observations in the field) are very limited in duration and season (as usual in an EIS) – the “short duration of surveys” is acknowledged (20-3) as well as **“it is possible that seasonal species were not identified”**(20-3): for this EIS it was 1 day (12/2/15: no number of hours specified) and one night (27/2/15: also no duration specified) in one area (not specified where), with additional surveys on 12/3/15 and 26/6/15 “to investigate areas not covered by the previous surveys” (20-3). (It is not specified where if a physical location is referred to, nor whether it was day or night, and the duration).

Repeated sampling over some time period is really needed to develop anything representing a comprehensive survey. And if you are not (inclined to be) looking for it, you don't tend to find it, and if you are quite time limited as all EIS's are, you are falling well short of what is a satisfactory, let alone a rigorous survey process.

Threatened Fauna Species

The EIS acknowledges that **Grey-headed Flying-foxes (GHFF)** use the area when foraging for food. An evening field study, consisting of two evenings only, confirmed this.

The project footprint is well within the nightly foraging range of the Clyde/Duck River camp, as well as other urban Sydney GHFF camps.
Urban GHFF camps have become important to the survival of the species which is now classed as Vulnerable under Federal and State legislation.
Neither street trees nor private garden trees have been included in loss of area calculation (see more on this below). Trees in these "unaccounted for" areas can be and are very important food resources for GHFF feeding.

This foraging habitat should have been quantified in their assessment and their conclusion re GHFF foraging habitat impact. As a result the area and significance of foraging habitat has been understated.
On 20-16, the EIS states that "These planted trees do not constitute habitat critical to the survival of the Grey-headed Flying-fox."
As there is currently no declaration by either the NSW or Federal Government as to what constitutes critical habitat this statement is disingenuous.

Stating under the heading Cumulative Impacts (20-20) that the combined Westconnex projects would result in "the removal of mainly planted vegetation and associated fauna habitats" (20-20) is not an adequate assessment of the whole Westconnex's project impact on Grey-headed Flying fox foraging habitat.

(https://m4eis.files.wordpress.com/2015/10/2grey-headed_flying_fox_img0526.jpg)

Grey Headed Flying Fox by Andrew Meares

This species in its increasingly urban environment relies on much planted vegetation. Indeed the number of urban camps now in the Greater Sydney area is a result of the available food provided by such urban planted landscapes in proximity to camps – themselves also located in some cases amongst planted vegetation, especially as suitable habitat elsewhere in the species range has significantly contracted since European occupation (estimated at 50 % loss: Eby,P).

The whole Westconnex project – combined M4E and New M5 will impact on urban GHFF foraging habitat to a significant degree.

Micro – bats (Large-footed Myotis and Eastern Bentwing Bat)

Given the very limited field surveys undertaken and poor quality recording of calls during these, the EIS cannot substantiate claims about the extent of use of existing infrastructure as roosting sites, nor claims about breeding habitat. The EIS claims there is no breeding habitat in

the study area, but a breeding habitat can also include roof and wall cavities in the absence of tree hollows.

Nor is there substance to the claims about re-colonising new roosting sites eg. continuing to use culverts post construction disruption (20-16). There is no evidence quoted to indicate this will happen.

Vegetation

It's stated as being substantially planted vegetation – "Planted trees and gardens", including parkland, involving 15.7 hectares made up of 12.9 hectares of planted trees and screening vegetation (although inconsistently, the EIS also refers to 13.3 hectares on page 27-11), and 2.8 hectares of grassland with scattered trees (i.e. parkland).

The EIS has not quantified the loss in area and nature of vegetation from private gardens and street trees. This should have been done since they claim they are providing in this EIS "a detailed assessment of ecological issues including impacts on flora and fauna".

The EIS included these areas in the 83 species number cited (20-6); it also should have been straight-forward to map the coverage, and so approximate area covered by this private/street vegetation. This was not done. This downplays the role (and given the aforementioned, the extent) of vegetation of any sort. Irrespective of whether it is planted or remnant, it is potentially important and can play an ecological role (ref. Fly-fox info. above).

The EIS therefore makes no real assessment of the nature and quality of the planted vegetation which can stand in to some extent for remnant vegetation if well planned and maintained. Dismissing it (just) as planted eg on 20-13 "All the above creek lines only have planted vegetation within their riparian corridors …." fails to provide any further detailed (qualitative or quantitative) assessment as to ecological value as claimed.

All city vegetation is important in the context of preventing, and countering the urban heat island effect, a recognised phenomenon. For instance, see http://www.cityofsydney.nsw.gov.au/vision/towards-2030/sustainability/carbon-reduction/urban-heat-island (http://www.cityofsydney.nsw.gov.au/vision/towards-2030/sustainability/carbon-reduction/urban-heat-island) , and there are urban biodiversity benefits of both planted as well as remnant vegetation well acknowledged by others.
For instance see September 2015 (Vol. 16, No. 3) of *Ecological Management and Restoration (EMR)* (pp. 206-213). Trees and shrubs (although the latter is not mentioned in the EIS) certainly "have the potential to provide nesting and shelter habitat for common birds and possums" (20-12). Not mentioned is that they also provide food resources either directly, or indirectly. This is a sloppy omission, but again it downplays and limits the vegetation's role.

Statement that vegetation connectivity is limited

Some animal species manage quite well in small and fragmented patches, and providing that patch distance is not too great other species are able to move between and utilise such patches.

Suburban gardens are an example of this even where there is no direct house to house connectivity and there are roads and footpaths separating areas; an example animal species would be the once common Superb Blue Wren, a small bird species which moves between home gardens finding necessary resources (nesting sites, shelter, food) quite satisfactorily. Ditto Blue Tongue Lizards, also once common but now in decline in urban areas. Given the EIS has not quantified nor assessed the ecological role of private gardens and street plantings (see above), EIS comments about connectivity do not tell the whole story and so the potential connectivity (and 'stepping stones') that exist via this vegetation is ignored.

(https://m4eis.files.wordpress.com/2015/10/superb_wren.jpg)

(https://m4eis.files.wordpress.com/2015/10/img_3528-1.jpg)

Garden and house in Walker Avenue, Haberfield would be bulldozed

There is some acknowledgement that existing patches "may be used as 'stepping stones' for fauna movement". No "may" about it. And such stepping stones are especially important for fauna crossing and leaving cities. It is known this does happen, and is important for migratory species, such as annual migrations of Yellow-faced Honey eaters observed through Sydney. Lack of connectivity disadvantages some, but by no means all native species.

Cumulative Impacts

20.4.7 of the EIS says "These losses in biodiversity are likely to be restricted in area (note the "likely" – this is again unsubstantiated opinion), given their location in highly modified environments" (26-10).

Highly Modified environments are synonymous with cities – that's why we **especially need to preserve the green spaces and associated vegetation that are there. We can't afford to lose more 'havens' within highly modified areas.**

This is where cumulative impacts are more acutely felt, and to dismiss them leads to a death by a thousand cuts scenario.

It is fatuous to say (20-15) that "The removal of planted vegetation would result in minimal fragmentation (ie loss of connectivity between vegetation), given the already fragmented state".

There is no mention of any compensatory parkland or other green space creation. Why should Westconnex be permitted to simply demolish the 15.7 hectares described in the EIS without creating any alternative/s.

If anywhere, in large cities with inevitably limited green space, and in such a generally modified environment, there should be mandatory, compensatory creation of green-spaces.

This is not generally done – just increased pressure on existing, contracting green-space areas.

The conservation of urban biodiversity has profound benefits for human well-being – physical and psychological health – *(Turner et al 2004: Global Urbanisation and the separation of humans from nature, Bioscience **54 585-590)* yet this social value to people is not addressed at all.****

There is also no attempt to assess the loss to biodiversity across the whole Westconnex project M4 widening, King Georges Interchange, M5 duplicate and the linking M4/M5 project. A Southern Motorway (F8) is also referred to in the EIS which would threaten wetland. This is a serious deficiency in the EIS.

3 thoughts on "**Major flaws in Westconnex EIS Biodiversity study**"

1. **John McCarthy** says:
   25/10/2015 at 8:57 am Edit

   Hi, my name is John McCarthy and I work as an environmental lawyer in NSW. I just had a brief look at the summary of the EIS and it is apparent that the EIS flora and fauna surveys would not satisfy the requirements of the NSW Threatened Species Act NSW 1995 and therefore this project would seem to be open to challenge in the Land and Environment Court NSW. I have worked on quite a few Threatened Species cases, see Torquil Cameron

V Nambucca Shire Council regarding the seasonality of studies and the requirement of 12-month study periods for Flora and Fauna. At this stage, I would contact the NSW Environmental Defenders Office for advice if you have not already done so. Regards, John

Reply (http://m4eis.org/2015/10/24/major-flaws-in-westconnex-eis-biodiversity-study/?replytocom=206#respond)

- **wendybaconblog** says:
  25/10/2015 at 9:21 am Edit

  Thanks for the comment John and advice. I am sure that people will follow up on this.

  Reply (http://m4eis.org/2015/10/24/major-flaws-in-westconnex-eis-biodiversity-study/?replytocom=207#respond)

  - **John Mccarthy** says:
    25/10/2015 at 9:26 am Edit

    Thanks Wendy

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A People's M4 EIS

Critique of M4 East tunnel EIS Human Risk Assessment

11/10/201531/10/2015 wendybaconblog Commentaries & Objections Air quality, Asbestos, Asthma, Diesel fuel, filtration, health risk, Lane Cove Tunnel, Lung cancer, M5 ventilation stack, No2, Parramatta Rd., PM 10, PM2.5, Volume 2B Appendix H

(*Editor: These comments have been prepared to assist other citizens and groups who are responding to the EIS. They are published anonymously. The author has spent several months investigating these health related issues. We invite discussion, using the reply button below.*)

This is a critique of Appendix J The Human Risk Assessment (https://m4eis.files.wordpress.com/2015/09/m4_east_eis_volume_2d_app_j_human_health.pdf) which was prepared for Westconnex by Environmental Risk Sciences Pty Ltd (enRiskS).

Executive Summary

- This Human Health Risk Assessment is not accepted as a reliable study of the health risks of the WestConnex project
- This assessment has several serious flaws, but the key one is that it is not independent. It relies completely on the findings of the Air Quality Impact Assessment (Volume 2B, Appendix H), which in turn relies on the WRTM traffic forecast model. It does not question, in any way, the findings of the Air Quality Impact Assessment, thus does not assess the health risks of the very real potential for induced demand on Parramatta Road.
- A truly independent study would have noted the "hot spots" already existing in the corridor and suggested that NSW Health should be monitoring, via a longitudinal study, the health of residents living, schooling and working near those places a truly independent health risk assessment would have concluded that peoples' health was already being compromised in this corridor, and that further "hot spots" are going to be created by the project and that the relevant government authorities should be taking action about it, including by urgently implementing the National Clean Air Agreement

- Both NO2 and PM2.5 levels are already elevated and above guidelines in many of the localities within the project area, so any additional traffic due to induced demand (in tunnels or on surface roads) will add to this situation.
- This risk assessment does not point out that the air quality standards or guidelines used in the EIS may be superseded by stricter ones at the end of 2015 when the new National Environment Protection (Ambient Air Quality) Measure (NEPM) standards are passed
- Other cleaner forms of transport are required in this corridor.
- Diesel fuel vehicles need to be phased out quickly, as is happening in France and proposed in other parts of Europe.

The Westconnex/AECOM Human Health Risk Assessment reaches the following overall conclusions

- The tunnel doesn't need filtration as there will be negligible pollution at the portals and the ventilation stack will disperse pollutants across the air-shed with negligible effect on local residents
- A detailed assessment of two key pollutants (nitrogen dioxide – NO2 – and particulate matter measured in microns – PM10, PM2.5) is required, given their known associated health effects and the impacts of their co-exposure (common in urban environments) and the known main source of PM2.5 (and finer) in the urban environment being vehicle diesel exhaust
- Potential health impacts associated with changes in air quality (specifically NO2 and PM) within the local community was assessed as low and essentially negligible
- There are some residents who will have an increased exposure to PM as a result of the redistribution of emissions from surface roads
- There are some residents who will be exposed to less PM2.5 as a result of the project
- Summary of mortality data for three key factors (COPD, lung cancer, cardiovascular disease) indicates that Sydney Area Health Service has rates higher than the average NSW rate for all three indicators; summary of hospitalisation data for key factors (asthma, cardiovascular disease, COPD) shows asthma rates similar to NSW and cardiovascular disease and COPD less than NSW rates (possibly accounted for by high GP service level in Inner Sydney)
- Increases in population (and its distribution) of the suburbs within the project footprint will have no impact on the health outcomes
- The time spent exposed to pollutants within the tunnel is very short (minutes) and in the absence of published guidelines for NO2 and PM within tunnels, advises keeping vehicle windows up and air con on recirculation setting
- Potential for noise and vibration impacts during construction could result in adverse health effects so management and mitigation plan required for health effects

- After construction, some properties will have elevated road noise so mitigation measures are required
- In such a complex project, there are inherent uncertainties in each of the methods used to estimate emissions and concentrations, and there are limits to how accurately any impacts in future years can be predicted

Summary of key air quality issues accepted by the Health Risk Assessment

- By 2021, without the project, the maximum (residential and commercial) 1-hour concentration of NO2 estimated to be (in micrograms per cubic metre) 375ug/m3 and 360ug/m3 (respectively) – which is well above the guideline (of 246ug/m3); with the project completion, the levels estimated as 307ug/m3 and 286ug/m3 (respectively) – still well above the guideline.
- By 2021, with the project, the cumulative (maximum annual average, rather than acute) NO2 concentrations estimated to be below the guideline of 62ug/m3
- By 2031, with the project, cumulative NO2 concentrations estimated below the guideline of 62 ug/m3
- By 2021, without the project, the maximum (residential and commercial) 24-hr average concentration of PM2.5 estimated to be 29.3 ug/m3 and 30.5ug/m3 (respectively) – which is significantly above the guideline (25ug/m3); with the project completion, the levels estimated as 28.2ug/m3 and 26.6ug/m3 (respectively) – still above the guideline
- By 2031,with the project, PM2.5 levels estimated as above the guideline
- By 2021, without the project, the maximum (residential and commercial) 24-hr average PM10 concentration estimated as 54ug/m3 and 55.4ug/m3 (respectively) – above the current guideline (50ug/m3) and well above the recommended (from the 2014/15 review) of 40-50ug/m3
- By 2021, with the project, the maximum (residential and commercial) 24-hr average PM10 concentration estimated as 52 ug/m3 and 50ug/m3 (respectively) – above both the current guideline and recommended (review) guideline
- By 2031, both without and with the project, PM10 will be above both guidelines
- Community locations most at risk by 2031 of mortality, cardiovascular and respiratory illness from increases in PM2.5 concentrations are: **Homebush Boys High School, Ella Community Child Care Centre.St Joan Of Arc Catholic School, Dobroyd Point Public School, Woodfield Aged Care Centre**

Methodology of the Health Risk Assessment

The Risk Assessment relies on key aspects of the Air Quality Impact Assessment including:

- The tunnel design claim that there will be negligible impact at sites of portals and ventilation stacks
- The findings of the air quality report within this EIS, which relies heavily on the air quality data from the 3 OEH monitoring stations at Rozelle, Chullora and Earlwood, one of which, Rozelle, does not monitor PM2.5
- Traffic estimates within this EIS (which in turn rely on the population estimates).

For the health indicators, it relies on:

- data that is five (5) years old for the key health indicators
- hospitalisation data only for respiratory indicators,and *has not included any GP data relating to consultations*.

It does not include the demolition of buildings (houses and commercial) in the risks associated with the project, even though a high proportion of pre-1980's buildings could have some asbestos on the sites.

Flaws in the Health Risk Assessment Methodology

- It accepts the claim that the tunnel design is "state of the art", and doesn't canvass options to filter using actual "state of the art" like the Hong Kong Wanchai By-Pass tunnel and Madrid (Spain) M30 Ring-Road.

- It accepts a tunnel design that infers there will be no pollution at tunnel entry or exit ramps, with the speed into entrance ramps relying on the "piston effect" to pull vehicle emissions into the tunnel and into the ventilation stack. A close questioning of the "experts" (at a number of the WDA consultations) about tunnel exit ramps where they hit Parramatta Rd and West City Link, found they agreed that **there would be pollution in the vicinity of ramps if traffic hits congestion on exiting, and the same would be true for queuing traffic to enter tunnels. Thus their definition of "portals" is strictly that entry/exit area within the tunnel, not leading into or out-of the tunnels.** An independent risk assessment would have noted the possibility of build-up of pollution around these portal sites and the consequent health impacts.

- More real-time local air quality data should have also been used, particularly from near the sensitive receivers, given that the nearest two OEH monitors are some distance from these sensitive receivers. The OEH monitor at Chullora is closer to the Homebush/Nth Strathfield receivers, whilst the OEH Rozelle monitor is closer to the Haberfield/Ashfield receivers. However, both of the monitors are more than five (5) kilometres from these receivers and are not measuring real-time air quality in a 6kmx8km square area that has five of the heaviest-trafficked roads in Sydney. A very high proportion of residents in this 48 square km area live within 300metres of one of these main roads, so are exposed to much higher levels of NO2 and PM than are claimed in this report and based on the data from OEH Chullora and Rozelle monitoring stations. In fact, the OEH Rozelle station (located in the leafy grounds of the old

psychiatric hospital near the river) does not collect data on PM2.5. ** An AMA submission into air quality states that the current air quality monitoring system in Australia does not adequately capture data relating to the exposure of vulnerable groups; and information on the levels that specific communities are exposed to, and the subsequent risk, is often unknown; the AMA believes the current monitoring system is only capturing data that represents exposure of the broader population, not people at "hot spots" – these "hot spots" would include the large number of residential and commercial properties within 300 metres of major roads (Australian Medical Association (March 2013), Submission to the Senate Standing Committee on Community Affairs, Inquiry into the impacts on health of air quality in Australia, p7). The Human Health Risk Assessment itself indicates there are 10,000 residences and commercial units (which includes multiple apartment blocks) within the affected zone. A conservative estimation of this population would be 40,000 people who may already be living in "hot spots".

- the data collected at the four (4) roadside air quality monitoring stations can be supplemented by similar data from the Lane Cove study (Cowie et al, 2012) collected at Parramatta Road Camperdown in 2006-2008, which indicated highly elevated levels of NO2 and PM2.5. The traffic count (2005) at the Camperdown (control) site in that study was 65,000 vehicles/day, which is a little fewer than the City-West Link count of 69,000 vehicles/day and higher than Parramatta Road (at Dalhousie St Haberfield) of 54,000 vehicles/day (NSW RMS Average Daily Traffic 2012). All this data shows that levels are already higher than the guidelines, which themselves have been questioned by the AMA and several other groups in their submissions to the Senate Standing Committee On Community Affairs Inquiry Into The impacts On Health Of Air Quality In Australia.

- It should have noted that the new national air quality standards to be endorsed at the end of 2015, well before the project starts, may include higher standards for PM10 than are used in this EIS. The outcome could be many more "hot spots" than acknowledged in the Air Quality Impact Assessment.

- The study should have noted that several international studies have shown the adverse health effects of living less than 500 metres from major roads. In one longitudinal study of 2,300 children in Los Angeles, Guaderman et al found that improvements in the air quality (particularly PM2.5 and NO2) over several years had dramatically improved the lung function of children living less than 500 metres from major roads (Gauderman WJ, Urman R, Avol E, Berhane K, McConnell R, Rappaport E, Chang R, Lurmann F, Gilliland F.2015. Association of improved air quality with lung development in children. N Engl J Med. 372(10):905-913). A paper that calculates the medical costs of air pollution indicates that even the NEPM standards give a false sense of "safe" levels of pollution. This report states that as average levels of air pollution increase so do the average adverse health effects and that in fact there is no safe threshold. The paper claims that proper cost benefit analyses should be undertaken to accurately quantify adverse health effects due to both local and general increases in air pollution (Barnett, A, 2014 "It's safe to say there is no safe level of air pollution" Australian and New Zealand Journal of Public Health 2014 vol. 38 no. 5). The health risk assessment does not acknowledge any critique of what is considered a safe threshold because it completely accepts the assumptions of the Air Quality Impact Assessment. Available evidence doesn't indicate there is an exposure threshold for PM below which health effects do not occur; thus this risk assessment should have erred on the side of caution.

- The study should have noted the large number of people living, working and schooling less than 500 metres from Parramatta Road and thus at an already elevated risk of health damage; it also should have noted the increased risk if this corridor does not have the reduced traffic volume estimated by the WRTM, given the additional sources from the tunnel traffic.

- The study should have noted that the times when children and parents are walking to/from school in this polluted corridor coincide with the peak readings of pollution from commuter traffic; the same is true of park usage (the main large parks near portals – Cintra Park, Ashfield Park, Reg Coady Reserve and Robson Park all have multiple forms of use day and early evening) – there is no acknowledgement in the study's methodology of this type of real-time pollution health risk

- the traffic estimates are problematic for the surface use of Parramatta Road with project completion, as they rely on population forecast data calculated prior to the Parramatta Road Renewal Plan release. The population of the six (6) LGAs within the footprint of the project is forecast to grow by 40% between 2011 and 2031 (higher than the Sydney forecast of 33%); this is a volume of 132,844 people (Vol 2A, sect 5.2.1,p5-6). The Parramatta Road Renewal Plan allows for an additional 40,000 units in eight (8) "precincts" to be build between Auburn and Camperdown. These additional units could add an average of 100,000 people to the forecast figure in 2031 of 132,844 to give a truer forecast total of 232,844. A very high proportion of these new unit dwellers will own/purchase vehicles, thus adding to the pressures on the Parramatta Road corridor.

- A scenario including all risk factors for 2031 should have been discussed – that of increased traffic on the surface of Parramatta Road the full length of the project. The concept of 'induced traffic demand' is a real one and has not been taken into account by this health risk assessment. A meta-analysis of induced demand (Cervero, R, 2001, Induced Demand: An Urban and Metropolitan Perspective, Paper prepared for Policy Forum, US Environmental Protection Agency) concluded that, whilst there were a range of elasticities associated with increased demand with new road infrastructure, the phenomenon should not be trivialised

- The study ignores the possible contribution of the project to the estimated health costs of the Sydney region. In 2005 in Sydney motor vehicle pollution alone accounted for $1.5b in health costs (Australian Bureau of Transport and Regional Economics, 2005, cited in Senate Standing Committee On Community Affairs Inquiry Into The impacts On Health Of Air Quality In Australia, NSW Environment Protection Authority Submission, September 2013, p15). As this report states … "particle pollution is the driver for the high public health costs of air pollution" (ibid).

- The mortality data for three key factors (COPD, lung cancer, cardiovascular disease) shows that Sydney Area Health Service has rates higher than the average NSW rate for all three indicators, yet this risk assessment does not question whether exposure to already elevated levels of NO2 and PM2.5 may be a cause of these elevated rates.

- The reliance on five years old data for the key health indicators is problematic, given background sources of key pollutants (NO2 and PM2.5 and PM10) have increased in that five year period, as evidenced by vehicle fleet data. According to the Sydney Morning Herald (March 15-16 2014) the number of diesel vehicles on the road in Australia has more than doubled since 2005. ABS data shows that in 2015 there are 3.6 million diesel powered vehicles, accounting for 19.7% of the fleet; and over the five year period from 2010, the number of Passenger vehicles and Light Commercial vehicles registered with diesel fuel increased by

96.4% and 62.9% respectively (ABS, Motor Vehicle Census, Australia, cat no 9309.0). This increase in diesel fuel use would have had both short term and longer term impacts on health in the period since this health data was published and has not been captured by it, nor has this health risk assessment mentioned increased risks from the growing diesel fleet. The other concern with growth of the diesel fleet relates to car manufacturers using software called "defeat devices" that allows the masking of exhaust emissions in pollution control tests. Recent revelations (eg SMH, Sep 23 2015) of such corruption by what was thought of as a "good corporate citizen" – the Volkswagen company – indicates the distinct possibility that other manufacturers may be doing the same. If the environmental protection laws are being flouted by many diesel fuel vehicle makers, then the claim by this EIS that tougher laws are making the Australian vehicle fleet (and therefore the air) cleaner is questionable. The best option for any government keen to improve air quality in polluted parts of Sydney would be to quickly phase out diesel vehicles.

- Hospitalisation data for respiratory indicators should have been supplemented by GP survey data (given Medicare does not collect this level of data), collected by the relevant Local Health Districts.

- Sydney Area Health Service collects data on health risk factors, published for each Local Health District. The risk factor model is one that can be called a "personal behaviour" model. It includes risky alcohol drinking, smoking, consumption of fruit & vegetables, being overweight or obese, and adequate physical activity). It does not include external risk factors, like living within a few hundred metres of a busy road. The fact that the Area Health Services in NSW do not collect data for external risk factors, although they are known (e.g. exposure to coal dust (mainly PM10) and road pollution (notably NO2 and PM2.5) means that more meaningful data is not available to these types of Human Health Risk Assessments.

- The health impacts from noise and vibration seem to be underestimated by this health risk assessment. The writer should have conducted an independent analysis of that assessment, rather than relying on its findings. A independent review of the noise and vibration section of the EIS (which will be published by the People's EIS soon) raises uncertainty in a range of areas of the noise and vibration assessment. It states that, given the number of potentially impacted properties and people within the project area, further work needs to be done to ensure the local community and other affected stakeholders are provided with a fully informed assessment. This needs to occur as part of the EIS consultation process where further comment can be sought from the community, and not simply resolved through the Submissions Report (http://www.wendybacon.com/2015/short-guide-to-nsw-governments-westconnex-eis-process/) which does provide for any further input from the community.

- The health risk assessment should have included a risk assessment for asbestos and a management plan for mitigating risks, given serious community concern has been expressed over issues with asbestos removal and treatment at Granville (M4 widening stage) and at Alexandria (M5E stage).

- It is common practice in health research (including health risk assessments) to identify and analyse any related health studies to understand their the implications for the project being assessed-in this case the WestConnex project.Two such studies have been conducted on the Lane Cove Tunnel and on the M5East tunnel. The risk assessment ignored the 'fine print' findings of both of these studies. The Lane Cove study was of the short-term respiratory (asthma-like symptoms) health effects of exposure to emissions from the tunnel stack. The study was conducted 2006-2008, with thirty six (36) participants originally, falling to twenty

(20) by 2008. This is a very small cohort from which to draw any strong conclusions. The "control site" was Parramatta Road, Camperdown. The main conclusion was that residents near the eastern tunnel stack reported increased symptoms (even though there were no increases in pollutants) and this could be accounted for by other sources of pollution not measured in the study (e.g. particles smaller than PM2.5 and/or volatile compounds) or other unknown sources. The study also found significant adverse effects of increased airway inflammation, and chest and eye symptoms associated with exposure along Parramatta Road Camperdown after only 2-hour exposure periods. The authors recommended a follow-up study to better understand the effects of the ventilation stack. (Christine T Cowie et al, 2012, 'A randomised cross-over cohort study of exposure to emissions from a road tunnel ventilation stack', BMJ Open 2012;2). No further studies have been conducted.

- In the study of the pollution effects of the M5 East tunnel (NSW Health, 2012), it was stated that the ventilation stack was an important source of air pollution in the area within a 2 km radius, contributing 23% of NOx and 17% of PM10. The study's aim was to consider cancer incidence in the vicinity of the tunnel stack. Whilst it found there was a significantly higher incidence of lung cancer in postcodes immediately around the stack, the study concluded that it was unlikely there was a causal link. However, the study did qualify its overall conclusions with the comment that the descriptive epidemiological method used in the study was a relatively weak tool to resolve the type of issues under investigation. The study methodology was unable to discern the types of lung cancers screened in the area (smokers vs non-smokers). The study's argument was that, given lung cancers can take a number of years to become apparent, the higher incidence recorded after the opening of the tunnel may not have been connected to the stack emissions. The study concluded that the higher incidence of lung cancer probably pre-dated the locating of the stack in that area. This is an alarming finding, given that the cancer registry data would have been available to NSW Health, Department of Main Roads and the other bodies responsible for the EIS prior to the building of the M5East. So it would appear that an area of Sydney which already had an elevated incidence of lung cancer was chosen as the site of the M5East ventilation stack, when health research was already indicating the causal link between particulate matter and lung cancer. Given that mortality data for three key factors (COPD, lung cancer, cardiovascular disease) indicates that Sydney Area Health Service has rates higher than the average NSW rate for all three, is it possible that this project is again ignoring the potential health impacts of a project that independent experts predict will increase total traffic pollution over time.

Flaws in the assumptions on which EIS health findings are based

- The health risk assessment does not take into account the possibility of total higher traffic along Parramatta Road than the WRTM forecasts. An Australian Government Department of Infrastructure and Transport Research (2012) report into traffic growth in Australia shows that traffic per person in Australia has grown steadily between 1965 and 2011. The measure of traffic volume (number of vehicles x distance travelled = vkt) in all states and major cities for this period indicates that the pattern of increases has been consistent, with only minor changes

in response to petrol price rises, unemployment and the global financial crisis. Forecasts of future growth in traffic volumes indicate that traffic in Australia will rise from 55 billion vkt per quarter in 2011 to more than 65 billion vkt per quarter in 2020.

- There is no reason to believe that traffic volumes on the surface of Parramatta Road will decrease after 2021, especially with the anticipated population growth in Sydney, including in Inner Western Sydney. The traffic studies on which the air quality data assessments are based does not take into account Urban Growth plans to build more than 40,000 apartments in Parramatta Rd. Given that this EIS shows that levels of PM2.5 and NO2 are already elevated in parts of this corridor, it is obvious the project is designed to take current volumes of traffic off this road so that high-density residential development can be enabled even in the face of currently known health risk factors. This is a huge gamble with people's health.

(Ed:This post was slightly updated on October 31, 2015)

One thought on "**Critique of M4 East tunnel EIS Human Risk Assessment**"

1. **Kathryn** says:
   22/10/2015 at 1:42 am Edit

   I raised at the Kingsgrove (no) information night the tunnel filtration used on the Hong Kong tunnel. I was advised by the Tunnel Filtration rep that the reason for filtration in Hong Kong was due to the stack located alongside apartment buildings 25 stories high. Looking at some of the Urban Growth designs, there is apparently planned buildings of similar size along Parramatta Road.

   When looking at the Kingsgrove unfiltered stack (in a valley), its proximity to Moorefields Rd Primary School and the many homes (upwind on a hill) the effect of this unfiltered stack will basically give these people a lungful of unfiltered toxins 24/7.

   A complete disregard to the health of the community and the potential medical bills that the state will have to pay on the long term.

   Reply (http://m4eis.org/2015/10/11/critique-of-m4-east-tunnel-eis-human-risk-assessment/?replytocom=162#respond)

Create a free website or blog at WordPress.com (https://wordpress.com/?ref=footer_website).
The Big Brother Theme (https://wordpress.com/themes/big-brother/).

A People's M4 EIS

National Trust : Westconnex not worth heritage destruction

20/10/201525/10/2015 wendybaconblog Commentaries & Objections
Australian Rail Association, Concord, Haberfield Heritage, Heritage, National Trust (NSW), National Trust motorway policy, Powell Estate, public transport

Last week, the National Trust of Australia (NSW) Advocacy Director Graham Quint made a submission to the Westconnex M4 EIS process. The National Trust (NSW) objects to the destruction of so much heritage and argues that the Westconnex motorway system is a flawed policy that does not justify the loss. The People's EIS recommends this submission to those concerned about the loss of heritage.

The submission begins by reiterating a few points drawn from its February, 2014 submission to the WestConnex Delivery Authority M4 concept design.

- It concerns the Trust that, at the Environmental Impact Statement assessment stage of this massive project, contracts may already have been signed and commitments made to commence construction when the full impacts of the development may only be coming to the public attention.
- Over the past fifteen years the Trust has continued to express concern at the heritage impacts of inner urban motorway proposals and has supported mass transport options such as light and heavy rail in preference to inner urban motorways.
- While acknowledging that the increased mobility and affluence of our society and an expanding population require much improved transport facilities, the National Trust opposes further motorways being brought into the inner suburbs and central business district if they threaten areas of historical, architectural, scenic and social importance.
- The National Trust believes that the provisions of public/private partnership agreements for urban motorways should be made public and that such agreements must not contain penalty provisions for compensation payments to a motorway operator if a public transport system competes effectively with the motorway.
- The National Trust would oppose public/private agreements that disadvantage the public who do not choose to use the toll roads constructed under those agreements and believes that massive expenditure on motorway development will divert much needed public and

private investment away from public transport development which can move large numbers of people more effectively and with much less adverse heritage impact.

- The constant daily movement of large transport trucks severely degrades the urban environment and the National Trust urges that rail transport should be the preferred means for transporting container goods related to Port Botany and Sydney Airport. The Trust would oppose motorway proposals which promote increased large truck movements through urban precincts, particularly those with heritage significance.

- The National Trust acknowledges that inner city motorway development will be inextricably linked to residential/commercial redevelopment of higher densities in the zones adjoining the
motorway and consequently, would oppose such development, or elements of that redevelopment when it: –

  impacts upon, or degrades the values of adjoining, Heritage Conservation Areas

  involves the demolition of Listed Heritage Items

  involves the demolition of places which have been removed from Heritage Lists on non heritage-based grounds

  involves the demolition of places which, in the Trust's view are of indisputable heritage significance, but which have been denied statutory heritage recognition.

National Trust history in campaigning with community

The National Trust has had a long history and involvement in campaigning with the community to protect inner urban heritage.

In 1972 the National Trust opposed the North-Western and Western Expressways which would have cut a swathe through Glebe, demolishing 800 homes and the property "Lyndhurst", to the steps of the Sydney Town Hall.

On 26 February, 2014 the Board of the National Trust of Australia adopted a Policy on the Heritage Impacts of Urban Motorways. This Policy built on and reiterated earlier positions and policy statements including:

- National Trust: Policy Statement on Urban Freeways (1976)
- National Trust Policy on Urban Freeways (1981)
- National Trust Discussion Paper: Towards a Transport Policy for the National Trust (1989)
- National Trust Policy Paper: Transport – The Heritage Implications (1995)
- Trust Alert: Motorway proposals threaten inner city Urban Conservation Areas (2005)

National Trust Policy on the Heritage Impacts of Urban Motorways (2014)

1. While acknowledging that the increased mobility and affluence of our society and an increasing population require much improved transport facilities, the National Trust will oppose further motorways being brought into the inner suburbs and central business district if they threaten areas of great historical, architectural, scenic and social importance.

2. The National Trust will oppose the loss of public parklands for inner urban motorway construction, including both permanent loss involved with a motorway route/connection ramps or shorter term alienation during the construction phase.

3. The National Trust believes that the provisions of public/private partnership agreements for urban motorways should be made public and that such agreements must not contain penalty provisions for compensation payments to a motorway operator if a public transport system competes effectively with the motorway.

4. The National Trust would oppose public/private agreements that disadvantage the public who do not choose to use the toll roads constructed under those agreements.

5. The National Trust believes that massive expenditure on motorway development will divert much needed public and private investment away from public transport development which can move large numbers of people more effectively and with much less adverse heritage impact.

6. The National Trust believes that the constant daily movement of large transport trucks severely degrades the urban environment and will urge that rail transport should be the preferred means for transporting container goods related to Port Botany and Sydney Airport. The Trust would oppose motorway proposals which promote increased large truck movements through urban precincts, particularly those with heritage significance.

7. The National Trust acknowledges that inner city motorway development will be inextricably linked to residential/commercial redevelopment of higher densities in the zones adjoining the motorway and consequently would oppose such development or elements of that redevelopment when it;

- impacts upon or degrades the values of adjoining Heritage Conservation Areas,
- involves the demolition of Listed Heritage Items,

- involves the demolition of places which have been removed from Heritage Lists on non heritage- based grounds,
- involves the demolition of places which, in the Trust's view are of indisputable heritage significance but which have been denied statutory heritage recognition.

Having regard to this Policy, the Trust has examined the Environmental Impact Statement's documented impacts on heritage and notes the following:

Listed Heritage Items to be demolished

- 11 and 23 Sydney Street, Concord, Rare examples of Victorian houses in Canada Bay
- 64 Concord Road, Concord, example of transitional Victorian/Federation house
- 9 Wattle Street, Haberfield, an example of John Spencer-Stansfield's Design No 1

- 19 Wattle Street, Haberfield

- 21 Wattle Street, Haberfield
- 23-25 Wattle Street, Haberfield
- 35 Wattle Street Haberfield
- 37-39 Wattle Street Haberfield
- 41-43 Wattle Street, Haberfield
- 51 Wattle Street, Haberfield
- 53 Wattle Street, Haberfield
- 46 Martin Street, Haberfield
- 164 Ramsey Street Haberfield.
- 92-94 Chandos Street, Haberfield
- 96 Chandos Street Haberfield
  Potential Heritage Items to be demolished
- 2 Short Street East, Homebush – a fine example of interwar bungalow with Arts and Crafts style details
- 15 Young Street, Concord – an example of a Federation Arts and Crafts style house with unusual decorative pressed metal oriel window apron
- 54C Sydney Street, Concord – an unusual example of an interwar bungalow with Arts and Crafts influences
- 56 Sydney Street, Concord – an example of a Federation bungalow
- 71 Concord Road, Concord – an example of a good intact transitional Federation/interwar bungalow

Properties proposed for demolition within the Haberfield Conservation Area
– 53 houses
– 29 of these contributory to the values of the Conservation Area
– 2 intact tree lined streets – Sydney & Edwards Streets
– Opening the back fences of other houses to the public domain

Properties proposed for demolition within the Powells Estate Conservation Area
– 11 dwellings
– 10 of these are contributory to the values of the Conservation Area

– 2 are individually listed Heritage Items
Partial demolition with major consequences
– Wesley Uniting Church, 81 Concord Road

Conclusions

The National Trust notes that this M4 East is only one section of the WestConnex Motorway and that **there will be additional heritage impacts relating to the St Peters Interchange and the future link between Haberfield and St Peters.**

In the Trust's view the heritage impacts of the WestConnex Motorway are severe. The Trust must question whether the financial commitment for the total project in today's dollars of $15 billion (inevitably set to rise) would be much better allocated to public transport.

Public transport in all its forms (heavy rail, light rail and buses) has much greater potential to remove motor vehicles from roadways, reducing traffic congestion.

The Sydney Trains Website explaining "why is rail travel a better choice for the environment?" puts the following case:

> Greenhouse gas emissions per passenger kilometre for rail transport is up to five times less than that of car transport.
>
> The Australian Rail Association has documented that only 2.6% of Australia's transport greenhouse gas emissions are attributable to rail.
>
> This 2.6% includes both passenger and freight rail so, in fact passenger rail contributes even less.
>
> A train line can move 50,000 people an hour. Compare this with a freeway lane which can move 2500 people an hour.
>
> Moving 1,000 people requires either 1 eight carriage train or 15 buses or anywhere from 250 to 1,000 cars. This quantity of car travel would then require 1.37 hectares of parking space in the Sydney Central Business District.
>
> Urban rail transport is seven times safer than road per passenger kilometre.
> The external costs of rail in terms of noise, air pollution, accidents, infrastructure deterioration and congestion are much lower than using your private vehicle

.

The National Trust lodges its objection to the WestConnex M4 East proposal because of its severe impact on Listed Heritage Items and Heritage Conservation Areas and because, in the Trust's view, it diverts much needed public and private investment away from public transport development which can move large numbers of people more effectively and with much less adverse heritage impact.

You can read the EIS Heritage Appendix here (http://m4eis.org/category/table-of-contents/heritage/)

Read more about the Haberfield Conservation Area (http://www.environment.gov.au/cgi-bin/ahdb/search.pl?mode=place_detail;place_id=3352) on the Federal Department of Environment's website

(https://m4eis.files.wordpress.com/2015/10/img_6459-1.jpg)

Haberfield Westconnex Action Group and Save Ashfield Park protesting against heritage destruction in October 2015

House – 9 Wattle Street, Haberfield	
Image	
Description	This is a single-storey house of brick, having a slate roof trimmed with terracotta. Its architectural style is the characteristic Queen Anne mode introduced to Haberfield by Richard Stanton, who developed the garden suburb. The house is an example of one of the variations of John Spencer-Stansfield's Design No 1 for Stanton's Haberfield Proprietary Limited. It has an L-shaped plan, with a gable wing projecting streetwards from a hip-roofed rectangle. The front is tuck-pointed with dark brick quoins and window reveals, and a squinch-brick plinth. The slate roof has gablet ventilators, terracotta trim

(https://m4eis.files.wordpress.com/2015/10/9-wattle-street.jpg)

Image from the EIS Heritage study – each item is documented. This house will be demolished to make way for an unfiltered ventilation stack

One thought on "**National Trust : Westconnex not worth heritage destruction**"

1. **Kathryn** says:
   20/10/2015 at 11:49 pm Edit

   Thank you National Trust!.
   On a recent trip to India on business – I had just one day to see the sights. Naturally I chose the heritage area of Hyderabad. Why – as a visitor – did I want to wander around the hitech area. The heritage area is what is the essence of a city. Sydney's equivalent is the Rocks, as well as those inner suburbs that are Australia's history. That is where the early settlors in the 1800 and early 1900 made their homes. Our forebears for many of us. Good

thing, back in the 70's, workers, National Trust and the people stepped in and stopped the Government and Developers from tearing down 'those old buildings' in the Rocks and Glebe. I am gobsmacked that such a proposal – to rip a motorway through our history – has advanced so far in its planning.

Reply (http://m4eis.org/2015/10/20/national-trust-westconnex-not-worth-heritage-destruction/?replytocom=158#respond)

Blog at WordPress.com (https://wordpress.com/?ref=footer_blog). The Big Brother Theme (https://wordpress.com/themes/big-brother/).

Westconnex fails Objective 10 : Protect natural & cultural resources and enhance environment

23/10/201525/10/2015 wendybaconblog Commentaries & Objections Asbestos, Beverly Hills, Cooks River Iron Bark Bushland, Erskine Park, Green and Golden Bell Frog, Grey Headed Flying Fox, Haberfield, Kathy Calman, property acquisition, salinity, Westconnex Core Objective 10, wetlands

(Editor: This is the third submission prepared from the perspective of the Objectives of the project. The other two did an overview analysis of all ten objectives – here (http://m4eis.org/2015/10/17/does-westconnex-meet-its-core-objectives/) and here (http://m4eis.org/2015/10/18/objectives-of-the-m4-project-yet-another-response/)

By Kathy Calman

(Kathy Calman is the co-convenor of the Beverly Hills Kingsgrove WestCONnex Action Group (https://www.facebook.com/notowestconnexbeverlyhills?fref=ts). She knows a lot about motorways because she has lived beside the M5 at Beverly Hills for years. She knows what it's like to be woken by truck noise in the middle of the night, to count the high percentage of cars with single drivers and she recently watched open space and trees she and other members of her community had planted being stripped away for the King Georges Rd interchange that Westconnex's own figures show will save little or no time for commuters. The community were told that the noise walls that offer some protection from M5 noise would come down for about 15 weeks. The Editor was told by the construction company Fulton Hogan that it could be up to 7 months. No wonder she warns residents of being wary of accepting promises about mitigation of construction impacts that could turn out to be wrong. She's also aware that native flora and fauna saved as a condition of the M5 would go if the Westconnex M5 duplicate is allowed to go ahead.)

(https://m4eis.files.wordpress.com/2015/10/11222423_1873063222917859_3341986940853463042_n3.jpg)

Kathy Calman at Westconnex Action Group early morning stall outside Westconnex headquarters with her frog cakes

Analysis of Core Objective 9 : Protect natural and cultural resources and enhance the environment.

The Westconnex's Core Objectives are drawn from the NSW Long Term Transport Master Plan (Transport for NSW 2012a)

The Westconnex project does not meet this core objective

Features of the M4 East project include: Widening roads; unfiltered exhaust stacks close to homes, schools and aged care centres; destruction of trees; temporary and permanent loss of greenspace; induced traffic onto local roads; impact on wetlands, groundwater and endangered species; exposing residents to prolonged high impact acute noise 24/7; hundreds of significant truck movements a day impacting on the safety of residents particularly primary school children; isolation; community dislocation; car dependence.

None of these factors enhance the environment. In fact, this proposal has a very significant negative impact on the urban and natural environment where over a quarter of a million people live and 64,000 work in the M4 section. It will remove valuable cultural resources including heritage buildings.

Sectional planning approach

I **object** to the sectional planning project approach to the 33 kilometre Westconnex motorway. This prevents serious consideration of the impacts of the larger Westconnex project. **While broad justifications for the whole project are used to justify local threats, there has been no overall analysis and evaluation of the environment threats from the whole project.**

This submission endeavours to take an **holistic approach** to the project and refers to both the M4 and M5.

Community Consultation

I object to the poor standard of community consultation.

Many people have reported that the information kiosks and material provide inadequate and misleading information to the public. The kiosks are attended by casual staff with no background experience or education on the subject matter.

Claims of 'busting congestion' and the various time savings getting from point to point are contradicted even within Westconnex's own EIS, not to mention independent infrastructure experts with worldwide experience (https://www.facebook.com/NoWestconnex/videos/658196694322742/) that slam this project as backward looking and based on poor transport planning principles.

The negative impact on thousands of people is either glossed over or embedded somewhere in the fine print in the Westconnex M4 EIS.

- Western Sydney is not aware that their daily commute will become a lot more expensive via new and reintroduced tolls
- Australian and especially NSW tax payers are taking the full risk on the viability of this project
- Unfiltered exhaust stacks – nine for this project spaced roughly every 3km.
- Increased pollution and noise
- Acquisition of parks, green space, homes and business
- Loss of local employment. (Estimation of hundreds in Haberfield alone).
- Impact on non-acquired businesses with loss of passing trade opportunities
- Local roads will be more congested and travel times for many longer
- Loss of an opportunity for NSW to invest in worthwhile public transport infrastructure that is the most efficient way to provide to move masses of people and freight and better meet the needs of the whole of NSW.

Social Impacts

Significant impacts on residents and businesses

Home acquisitions

The stated recommended mitigations in Appendix M is contradicted by actual outcomes. Home Owners (reported (http://www.smh.com.au/nsw/residents-offered-far-below-market-value-for-homes-needed-for-westconnex-lawyer-says-20150702-gi3puf.html) in the media) claim that lower than market value is offered for their homes and that they are bullied by RMS staff. Longstanding communities members are being forced to move far from their social networks (http://www.altmedia.net.au/baird-accused-of-being-blind-to-westconnex-pressure-on-older-residents/111184).

Renters are also having to seek legal advice for relocation compensation. One long term renter in the same home for 18 years was only offered $5000 to relocate.

The disadvantaged residents in social housing (including independent homes for people with special needs) of RMS property have not had their needs addressed in the rush to evict hundreds of people from their homes.

Most of these people forced from their homes will likely find they have to move some distance away from where they have established support networks. This would be particularly hard on the frail and elderly.

I object to the mitigation of offer of 'counselling' which even if it does exist (and some say it has not been offered to them) would be of little assistance.

Impacts on social facilities

In the area impacted by the project, there are:

- 8 aged care and nursing homes
- 5 primary schools, 3 high schools and 3 kindergarten to Yr 12
- 5 childcare centres and one tertiary education provider
- A number of sports and recreation facilities
- Religious services a
- Shopping centres

I object to the 'mitigation' for organisations that will be left near the tollway construction site (such as the Willows Private Nursing Home and Peek-a-boo Child Care Centre) described as "consultation for 'relief periods' from 24 / 7 construction (destruction) if "feasible and reasonable". This proposal is shallow and unacceptable.

This is an inhumane approach towards the most vulnerable in our society.

(https://m4eis.files.wordpress.com/2015/10/img_3433.jpg)

Students from Haberfield Primary School protesting on the pedestrian bridge after school

Amenity Mitigation

This project will have a high impact on thousands of people. Noise 24/7 for three years, loss of visual outlook, and views of construction (destruction) compounds should not be trivialised. This is a prolonged construction period.

I object to the suggestion that decorating hoardings and some temporary plantings around the compounds is 'mitigation'.

Sports fields

Locals and visiting teams will be playing active sport within an environment of elevated pollution. Emissions from modern vehicles contains fine particulate matter that can penetrate the cells of lungs. (See Air quality submissions here (http://m4eis.org/2015/10/15/environmental-justice-westconnex-and-air-pollution/) and here (http://m4eis.org/2015/10/22/comments-on-air-quality-impact-statement/).

I object to a project that places the health of the community at risk.

Unsafe Removal of Asbestos.

This dangerous substance has been located in several locations across the Westconnex project already. There is evidence (https://newmatilda.com/2015/10/02/westconnexs-asbestos-problem/) that trucks removing asbestos have not been following appropriate safety standards such as sprinkler systems,

washing down trucks before departure, and neglecting to properly cover loads.

I object to the contempt Westconnex has shown for the health and safety of residents (http://www.jennyleong.org/government_forced_to_recognise_westconnex_asbestos_concerns) within the locations and on route to Erskine Park where soil contaminated with asbestos has been dumped without being wetted or properly covered at the time of disposal.

Divisive Infrastructure

I object to a 'solution' that results in a dreadful outcome on the amenity for all impacted suburbs. A wide, dirty and noisy toll road and the spaghetti interchanges thrust through suburbs that form part of Australia's 19th and 20th century history including the destruction of heritage listed homes and historic buildings.

Mental Health

The stress imposed on people by the Westconnex will increase the likelihood of anxiety and depression. The grief people will experience watching the suburb and urban landscape they love permanently destroyed has not been sufficiently addressed in the EIS social impact statement.

The permanent impact of this toll road on thousands of people's physical and mental health through

- visually divisive spaghetti interchanges
- noise barriers -that we know little care to landscaping for residents will be addressed –ref M5 KGR landscape design aka bare noise walls
- prominent and unfiltered exhaust stacks a constant reminder that residents and workers and their families are being poisoned by high levels of pollution
- loss of accessibility by pedestrians and cyclists
- impacts on the elderly for mobility, safety, connectivity and isolation
- impacts to the community and schools with the loss of neighbours
- impacts on the significant number of people forced to leave their home and community – loss of social networks and loss of school mates.
- stress and anxiety brought on by living in a permanent high noise and highly polluted environment.

Cumulative Impacts

Claims of reduced traffic on Parramatta road and improving amenity are unsubstantiated. The traffic congestion on the Parramatta road corridor will not improve (source your EIS). With a better solution to mass transport people (public transport) not addressed and increasing population, Parramatta Road will remain congested.

Impact on businesses

There are approximately 600 permanent jobs that will disappear due to this project due to property acquisitions at Haberfield alone. Remaining businesses, including aged care and child care centres, are likely to fail or suffer significant loss of trade. Suggestions that the patronage of construction workers will augment the local economy seem to be clutching at straws to find a solution here.

Social Infrastructure

Stated mitigation – Landscaping treatments for the benefit of residents. Let's revisit the landscape design of the King Georges Road Interchange – hundreds of metres of bare noise walls because it is easier for the maintenance crew to inspect. Never mind the residents or professional pride or genuine appreciation for the huge disruption caused to residents. Ugly bare walls.

I object to the likely outcome facing residents of the landscaping treatments being a typical, visually divisive structure.

Loss of vegetation

- Tree canopy for the communities along the 33km route of WestCOnnex is less than 19%. This polluting tollway will remove even more precious greenspace.
- Even a single hectare lost is devastating for highly urbanised communities, particularly where the shared greenspace is all they have.
- WestConnex has not included the overall acquisition of greenspace across the whole Westconnex project in any of its community 'information' material to enable the general public to form an informed opinion of the costs and benefits of the project.

Car Dependence

Build a city for the people – and they will come. Build a city for cars – and congestion will prevail.

Ironically, it is these suburbs – targeted for destruction by Westconex – that demonstrates what the NSW Govt should be the planning for new outer suburb communities. The walkability factor – with ready public transport and local shopping centres. Local employment opportunities or employment centres (including high value jobs) within 60 minutes by public transport. Shared community spaces for gardening and leisure and social connectivity. Cultural and entertainment facilities for all ages.

The infrastructure planning for the new western suburbs, such as near Camden is woeful, with only 7% of Camden residents using public transport. Westconnex promotes socially isolating car dependence and the environmental impact of ever increasing traffic noise and air pollution – and does not provide residents of the western suburbs with any relief from congestion.

I object to this proposal as it is the wrong project for the wrong time.

Biodiversity and natural environment

Australia has the notorious distinction of having possibly the worst extinction record on earth according to Richard Kingsford, professor of environmental science at the University of NSW. This is predicted to continue without serious changes to the way we conserve our environment

Endangered Fauna

Green and Golden Bell Frog

Scientists are studying several species of Australian frogs – including the endangered green and golden bell frog – whose skin secretions are toxic to the multi-drug-resistant golden staph know as MRSA. The GGBF secretions may be the wonder drug of the 21st century. Yet, the overall WestConnex project will more than likely be responsible for the extinction of such an important species.

Rare Grey Headed Flying Fox

The cumulative loss of vegetation for this vulnerable species in the M4 and M5 sections will significantly contribute to the endangerment of yet another species. These flying foxes forage on vegetation regardless if it is original or planted. The Office of Environment and Heritage states that the continued removal of foraging vegetation – and the forced concentration of populations into smaller regions – will result in a continued decline in their numbers.

Eastern Bentwing Bat

The impact on this species will be the loss of foraging habitat and the disturbance of roosting sites. Again, as similar to all of our native animals within Sydney metro, the significant and continued loss of vegetation will have a serious impact on these local communities.

Cooks River Castlereagh Iron Bark bushland

Another cumulative impact on our natural environment, with the loss of a critically endangered stand, a development condition of the first M5, will be destroyed.

Wetlands

Wetlands provide significant economic, social and cultural benefits. They are important for primary products such as pastures, timber and fish and support recreational and tourist activities. Wetlands also help reduce the impacts from storm damage and flooding, maintain good water quality in rivers, recharge groundwater, store carbon, help stabilise climatic conditions and control pests. They are also important sites for biodiversity.

Wetlands cover about 9% of the earth's surface and are estimated to contain around 35% of global terrestrial carbon. Wetlands act as sinks for carbon dioxide and other greenhouse gases, especially if their vegetation is protected and their natural processes are maintained.

The proposed F6 extension (which is referred to as a given in the EIS although it is not even in early stages of planning) will likely also impact on the Rockdale wetlands – another significant loss to our natural and human environment.

I object to the sectional approach taken to the Westconnex project which makes it difficult to properly assess the cumulative impact on our wetlands across both Westconnex and Southconnex

I object to the unwarranted destruction of what remains of our natural environment for a project which is managed by politicians and business people who continue to hide the business case on which it is based. Westconnex managers have been unable to properly debate or refute the many informed critiques of the project.

Flooding

During construction, there is the potential for local catchment runoff to enter project excavations at the interchange locations and impact the construction ancillary facilities. Construction activities also have the potential to exacerbate flooding conditions in adjacent developments. The mitigation stated are physical barriers designed to protect the works areas and tunnel entries so as not to increase flooding conditions in adjacent areas. The public needs full independent advice on the safety of the tunnels which is not possible in the short period allowed for consultation.

Urban Salinity

I am concerned about the potential for salinity damage that can shorten the life of urban infrastructure such as roads, buildings, water and sewage pipes. This leads to costly maintenance and repair by homeowners and councils.

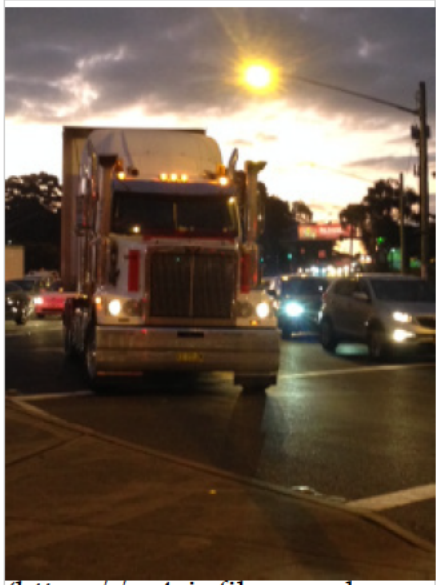
The movement of excess water and salt in parks and gardens can affect plant growth and cause plant death. Sports grounds and recreation areas affected by urban salinity may become bare, unattractive and unusable. Soil properties can be altered significantly making it hard to revegetate these areas.

Pockets of native vegetation in and around urban landscapes may also be affected. This can have serious consequences including the disappearance of native flora and fauna and poor downstream water quality.

I am concerned about the impact of groundwater and the potential for increased risk of flooding due to the reduction of greenspace.

The public needs access to more independent technical information so that they can understand the true impacts of the project.

I conclude that Westconnex comprehensively fails one of its claimed core objectives – *'Protect natural and cultural resources and enhance the environment'* is not met by the Westconnex project.



(https://m4eis.files.wordpress.com/2015/10/img_3108.jpg)

Trucks waiting to get onto the M5 at Beverly Hills

Here's another strong submission from a resident at Haberfield (http://m4eis.org/2015/10/06/a-response-to-westconnex-m4-east-proposal-an-objection-from-a-haberfield-resident/).

Aurelia's story from Homebush (http://m4eis.org/2015/10/14/westconnex-comes-to-underwood-road-homebush-aurelias-story/) also provides more on the social impacts of Westconnex.

Here's a summary of the Social and Economic Impact Report (http://m4eis.org/2015/10/04/summary-of-m4eis-social-and-economic-impact-reports/)

(https://m4eis.files.wordpress.com/2015/10/img_3305.jpg)

Kathy Calman knows from experience what it's like to live near a motorway. Her house in Beverly Hills

One thought on "**Westconnex fails Objective 10 : Protect natural & cultural resources and enhance environment**"

1. **Kathryn** says:
   24/10/2015 at 10:01 am Edit

   The M5 King Georges Road Interchange – Cooloongatta Rd – the noise wall situation is getting worse. An error that we pointed out a year ago in the EIS stated our noise walls were 2.5 metres. They neglected to record that there was a 2 metre mound, making it 4.5 metres (and still we are above RNP night time noise goals at that level).

   According to Fulton Hogan – its 3 metres in the EIS and 3 metres we are getting (though the EIS actually recommended our walls should be 8 metres). To make matters worse, we are getting plastic walls. 128 metres of the stuff – instead of concrete barriers. Nice view of 12 lanes of highway!. Thanks residents for putting up with the destruction for 19 months. Here is the payback. An unliveable suburb.

   Reply (http://m4eis.org/2015/10/23/westconnex-fails-objective-10-protect-natural-cultural-resources-and-enhance-environment/?replytocom=180#respond)

Blog at WordPress.com (https://wordpress.com/?ref=footer_blog). The Big Brother Theme (https://wordpress.com/themes/big-brother/).

A People's M4 EIS

Westconnex climate change claims don’t ring true

 02/11/201502/11/2015 wendybaconblog Commentaries & Objections climate change, Gavin Gilchrist

With less than two months allowed for the consultation period, there are many topics and issues that will be overlooked. Some of these will be investigated more closely after the exhibition period closes.

On the question of climate change and Westconnex, the People’s EIS strongly recommends this SMH piece by sustainability consultant Gavin Gilchrist

http://www.smh.com.au/comment/westconnexs-climate-claims-dont-ring-true-20151027-gkkava.html (http://www.smh.com.au/comment/westconnexs-climate-claims-dont-ring-true-20151027-gkkava.html)

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The Big Brother Theme (https://wordpress.com/themes/big-brother/).

The Sydney Morning Herald

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WestConnex's climate claims don't ring true

Gavin Gilchrist
Published: October 29, 2015 - 9:00PM

There's so much about WestConnex, the proposed 33-kilometre toll road across and under Sydney, that doesn't add up in so many ways, but nothing as much as the NSW government's claims about its climate change benefits.

The Baird government claims this $15.4 billion road across the inner west and south-west will be good for the climate.

WestConnex is a looming megaproject that almost seems to have evolved from another era in public life, a period when a Prime Minister believed coal was good for humanity, his top business adviser thought climate change was a United Nations plot, and Clive Palmer was a political force to be reckoned with.

WestConnex today is a project whose time has come and gone before its design has even been finalised. From the PM down, most recognise the need to deal with climate change.

For three years, the NSW government, proponents of WestConnex, said nothing about the toll road's climate change impact. But last month the environmental impact statement for the M4 East extension – public submissions for which close next Monday – included analysis on greenhouse gas emissions from consultants Aecom, the same firm that announced last month that it would no longer provide traffic and revenue forecasts for toll road operators, having settled a $280 million legal case for overly-optimistic forecasts for a proposed Brisbane toll road.

The M4 East section comprises two three-lane tunnels and linking roads and interchanges from Homebush to Haberfield; the environmental impact statement steps us through forecasts for greenhouse emissions from vehicle exhaust. The conclusions do not add up.

Aecom calculated the "vehicle kilometres travelled" (one vehicle travelling one kilometre, or the "VKT") in one year along different sections of the M4 East, including the tunnel, and the alternative route on Parramatta Rd. By 2031, on their figures, there will be 41 per cent more light vehicle traffic (cars, vans and motorbikes), from 266 million to 375 million VKT, if WestConnex is built compared with if it was not built.

For heavy vehicles (trucks and buses) it is forecast to double annual VKT from 27 million to almost 57 million by 2031 with WestConnex compared with if it wasn't built.

The WestConnex M4 East tunnel, running largely south of Parramatta Road *Photo: WestConnex Delivery Authority*

Elsewhere in the document these increases are explained as being because of the "attractiveness" of WestConnex for trips to the city, airport and Port Botany. That is, new roads induce more traffic.

Calculations are then made about vehicle types, their fuel consumption and their speed to conclude there will actually be a decrease in overall fuel use. Light-vehicle VKT may be up 41 per cent but total fuel consumption falls 11 per cent. Trucks movements double but their fuel use is down 13 per cent.

This lower fuel use, thanks to WestConnex, is why this environment impact statement suggests vehicle greenhouse emissions will be lower with WestConnex than without.

How can this be? We read: "As improvements to traffic flow and congestion are achieved through increased speeds, reduced travel distances and reduced frequency of stopping, fuel efficiency is improved and subsequently GHG [greenhouse gas] emissions associated with road use are reduced."

We're told that because traffic will be whizzing along rather than stuck in a jam, less fuel will be used. This argument has for years been discredited: what matters is the VKT. Higher VKT means higher greenhouse emissions. No credible authority in the world today would suggest that building freeways is the solution to cutting national greenhouse emissions.

And in fact, by 2031 WestConnex traffic will not be whizzing along. The official analysis shows that by 2031 there will be "high traffic densities" in the M4 East tunnel "particularly westbound during the AM peak where capacity is reached". In other words, the tunnel will be chockers and at a standstill.

What then? Build another six-lane tunnel?

Gavin Gilchrist is a sustainability consultant. He worked briefly this year for NSW Greens MP Jenny Leong.

This story was found at: ***http://www.smh.com.au/comment/westconnexs-climate-claims-dont-ring-true-20151028-gkkava.html***

A People's M4 EIS

A People's M4 EIS

This website exists to help people take back some control over the planning process. It is independent of any other organisation and is entirely volunteer run and funded.

Our aim is to help people access information needed to understand how the NSW Baird government's 33 kilometre Westconnex tollway project would affect not just transport options but also the future environment and health of Sydney. The People's M4 EIS is part of a broader community attempt to open up public debate about the Westconnex and counter the lack of transparency in decision making surrounding it.

The Westconnex is a single project, to be delivered in five separate stages. This means that while supposed broad benefits of the whole project are constantly proclaimed by the NSW government and Sydney Motorway Corporation, the negative impacts of the whole project are never assessed.

The EIS for the Westconnex M4 East was published by the NSW Department of Planning as a large PDF document – over 1GB, and nearly 5000 thousands of pages – on September 9, 2015. The community was given only 45 days to submit responses, although this was extended by ten days to November 2 because of a failure by the Westconnex Delivery Authority to file all the required documents.

Before waiting for the results of the EIS and planning process, the Westconnex Delivery Authority has already awarded the contract to build the M4 East to a consortium led by CIMIC (previously Leightons) and Samsung.

The way that NSW Planning Department and the Westconnex Delivery Authority have designed and published the EIS does not make it accessible. We've made it a little easier to find the bits you want (http://m4eis.org/category/table-of-contents/) in the PDFs.

We have published several parts of the EIS in a format that is easier to read (http://m4eis.org/category/selected-sections/) and enables you to cut and paste text more easily to build your own submission.

We have solicited and shared some 'plain English' commentaries to help you to make your own informed assessment of the Westconnex M4 tunnel. One of the problems with the EIS is that it fails to engage with contemporary developments in transport planning and critiques of its approach. This is a serious problem when the decisions to be made will have a huge impact.

We will be publishing some sample submissions, so that you can see what other people do or don't like about the M4 East project.

You can comment on any page or reply to anyone else's comments. If you have made a submission you would like us to share, please let us know. If you have ideas for how we can develop the People's EIS, leave a comment on this page.

In this way we hope together to break through the daunting amount of data and help the community to build strong individual and group responses.

Your contributions will help build an independent source of information for the community about the project.

Here's how you make a submission to the official planning process :

http://m4eis.org/2015/09/11/how-to-object/ (http://m4eis.org/2015/09/11/how-to-object/)

Additional Note on November 2

Parts of the People's M4 EIS has been submitted to the NSW Department of Planning to be considered as part of the assessment process.

We will continue provide updates on the rest of the planning process.

People: Many people have contributed to this project including Ben Aveling, Wendy Bacon, Luke Bacon, Henare Degan, Nicole Gooch, Miska Mandic and others.

8 thoughts on "**A People's M4 EIS**"

1. **Kerry** says:
   27/09/2015 at 11:10 am Edit

   Fantastic! Thank you to those who have worked so hard to get this site up-and-running. It will assist us residents to share our concerns and share what we have learned in interactions with the WDA "team".

Reply (http://m4eis.org/?replytocom=45#respond)

2. **Kathryn Calman** says:
27/09/2015 at 3:14 pm Edit

   This is an amazing piece of work that you have put together. Thank you!!!

   Reply (http://m4eis.org/?replytocom=46#respond)

3. **Anthony johns** says:
30/09/2015 at 9:44 pm Edit

   I think the project would be more worthwhile if it were less obviously partisan. As it stands, it's hard to believe anything you solicit written in "plain English" won't just be polemic

   Reply (http://m4eis.org/?replytocom=47#respond)

   - **wendybaconblog** says:
   01/10/2015 at 3:34 pm Edit

     The EIS is written entirely from the perspective of the 'proponent' which is Westconnex. Aecom that managed and prepared much of the EIS has involvement in many aspects of this project – from concept design to 'traffic director'. So it is reasonable to warn people to treat official EIS data and its presentation with scepticism. Likewise claims of critics should also be tested. One of the ideas behind the project is to subject the empirical claims to scrutiny so if you see any factual claims by critics you think are false Anthony Johns please be sure to comment.

     Reply (http://m4eis.org/?replytocom=48#respond)

4. **Michael Luis** says:
06/10/2015 at 8:30 pm Edit

   Keep up the good work.
   Big thanks to all the contributors.

   Reply (http://m4eis.org/?replytocom=76#respond)

5. **Janet Dandy-Ward** says:
26/10/2015 at 10:22 pm Edit

   Thank you so much for putting this together, this is really great information!

   Reply (http://m4eis.org/?replytocom=233#respond)

6. **Phil Siefert** says:
31/10/2015 at 5:43 pm Edit

   Given the steps that have been taken by the NSW Government to privatise Westconnex Delivery Authority and NSW Planning department in the name of "fast tracking": such as construction awards before planning approval, lack of independent review, and no obvious review of public transport options – I have never felt more sceptical and disillusioned by a government.

   Thank you for the clarity of your submission —

   Reply (http://m4eis.org/?replytocom=302#respond)

7. **Matt Mushalik** says:
02/11/2015 at 9:08 pm Edit

   The full listing of all chapters was very useful when writing my submission which is in the downloads section of my website

http://crudeoilpeak.info/downloads (http://crudeoilpeak.info/downloads)

Reply (http://m4eis.org/?replytocom=354#respond)

Blog at WordPress.com (https://wordpress.com/?ref=footer_blog). The Big Brother Theme (https://wordpress.com/themes/big-brother/).

A People's M4 EIS

Summary of M4EIS – Social and Economic Impact reports

04/10/201502/11/2015 wendybaconblog Commentaries & Objections Ashfield, Business impacts, Cintra Park, Concord, Constructions impacts, Economic Impacts, Haberfield, Heritage, Homebush, impact on social infrastructure, Operational impacts, Parramatta Road, public transport, Social Impacts, Strathfield, Wattle Street.

This is a summary of the sections of the EIS which deal with Social and Economic Impacts. It also contains some editorial comment and critique

What is the purpose of the summary?

The lives of many thousands of people would be negatively affected by the M4E project. Many have already been disrupted and experienced the severe stress of losing homes and community. Others are living in fear of the intense noise, dust and large scale construction that will surround them for years or are worrying about what it would be like to be live beside a massive tollway. Beyond this specific proposal for the M4E tunnel, millions will be affected by the whole Westconnex project. There is the potential health, social and economic costs of more traffic congestion and the lost opportunity cost of spending $15.5 billion on tollroads rather than public transport. In evaluating this EIS,it's important to understand how adequately these negative impacts have been evaluated. But this is difficult because the reports are long and often repetitive.

The community members could research and describe those impacts themselves – and some residents and groups are doing that – but it is also useful to understand what is in the EIS report. This summary of the Westconnex Social and Economic impacts reports will guide you through the material.

This *is* a summary so by publishing this summary, we're not suggesting that the material in the EIS reports is adequate or even accurate. In fact, even a cursory reading will convince those who know about this project that it is an inadequate report. For example when the EIS refers to 'community consultation' it might be referring to what many members of the community have

experienced as inadequate information provision. Some 'facts' may also be selected rather than others because they promote the case for the Westconnex. Much of the information in the reports was not gathered by consultants GHD but by Westconnex communications staff. So treat the reports and summaries as starting points for further investigation. Soon, we will publish our first critique of this section. You can use any of our material to produce your own submission. If you see points that you think should be investigated or are wrong but don't have time or resources to do that, please leave a comment at the bottom of this post.

It's also relevant to keep in mind that these reports are not independent. They were signed off by AECOM (http://www.aecom.com/),which has major interests in the project. The work was done for AECOM by GHD (http://www.ghd.com/ghd-australia/) another major contractor who boast on its website that "together with their clients are creating community benefit". The clients are other major private companies and public authorities. The question addressed by the reports is not 'given these social impacts, should the project go ahead?' but 'Assuming the project goes ahead what will the impact be?'

Some points of interest have been emphasised in 'bold' and a few Editor's comments in 'italics'.

If you want to read the full reports the links to Appendices M (Social Impact) and N (Economic Impact) are here (http://m4eis.org/category/table-of-contents/social-economic/)

Summary Chapter 14 Social and economic, Appendix M (Social Impact Assessment) and Appendix N (Economic Impact Assessment)

Study area

The study area is defined in terms of both local precincts and local government areas. Generally, it is narrowly defined -for example, although the M4E may together with the M5 impact on Marrickville and City of Sydney local government areas, they are excluded from the assessment.

The study area is defined as the **'Ashfield, Auburn, Burwood, Canada Bay and Strathfield local government areas'** which are compared to the greater Sydney region 'as the wider catchment for the project'

The social impact assessment considers five local study area precincts: **Homebush precinct, Concord precinct, Cintra Park precinct, Wattle Street precinct and the Parramatta Road precinct**.

The economic impact assessment outlines the following areas as those 'most likely to experience business impacts due to the project'—**Homebush SA2, Strathfield SA2, Concord West – North Strathfield SA2, Concord – Mortlake – Cabarita SA2, Burwood – Croydon SA2, Five Dock – Abbottsford SA2 – Ashfield SA2, Haberfield – Summer Hill SA2;** but also makes references to the wider economy particularly in Appendix N (Economic Impact Assessment)

The socio-economic assessment also draws on community consultation 'undertaken…during land acquisition and community engagement activities' and is planned to continue through to operation of the M4 – East project. This consultation led to the following issues being identified: 'property impacts, traffic and transport, air quality, ventilation and health, preferred design, open space, recreational and community facilities, heritage and environment, noise and vibration, amenity, construction [and the] community consultation process.' (*Editor: The report assumes that this community consultation has taken place but many residents deny this. The report also recommends that counselling and support should be available for people being forced to move from their homes but many involved in the process say this is not happening.*)

No consultation was undertaken specifically for the Economic Impact Assessment

Assessment Methodology

The approach to the study included desktop research from Australian Bureau of Statistics and other sources (there is a lot of that), some consultation with Councils and some social infrastructure providers, documentation of the consultation process and a review of technical reports.'Social research' was conducted to establish community values and local issues but it not clear what form this took and no references are provided.

(Editor: At a Strathfield EIS exhibition session, it was explained that two GHD consultants did some direct consultation with Councils in 2014 but in 2015, after the final route was announced, Councils were not further consulted. In 2015, consultaiton with social infrastructure providers was only done by giving questions to WDA communications staff who communicated answers back. There was a review of other technical reports, most of which were only available in final form shortly before the EIS was completed in early September. No focus groups were conducted and no direct interviews between the consultant GHD and affected residents were conducted.)

Assessment Framework
On page 23 of Appendix M Table 3.1 describes a ratings framework which was used to rank or assess the impacts. The framework has time, location and level of impact (negligible, minor, moderate and major) dimensions but there is little reference to the application of the framework in the rest of the report and it is not clear where and how it was applied.

Existing environment

This section examines the existing context of the local government areas and precincts this project is likely to affect, but is generally limited to the physical footprint only (ie social and most economic effects that occur outside the footprint of the project will not be able to be assessed by this report)

- 258,326 people reside in the study area as of 2011, with this set to increase by 52% to 393,750 by 2031
- 64,000 people employed in the study area as of 2011, with this potentially to rise to 100,000 by 2031
- Gross regional product (GRP) of the area $21.4 billion (2012-13) with 18,200 businesses in the area in 2014 (14-8), mainly small businesses (91% under 20 employees) and most commonly real estate (16%), professional (14%) and construction (13%)
- Parramatta Road currently congested, limited parking and low amenity leading to reduced business viability, with A Plan for Growing Sydney outlining Sydney Olympic Park, Rhodes and Burwood as strategic centres to have 10,000 jobs and be 'employment, retail, housing, services and mixed uses' prioritised; also priority revitalisation at Wentworth Point and Carter Street
- Business clusters close to the project are listed as Lidcombe Business Park and Campus, Homebush Business Park, Sydney Markets, Direct Factory Outlets (DFO) Homebush, the Bakehouse Quarter, businesses along Parramatta Road and town centres and shopping/business centres including a cluster close to Strathfield Station, Great North Road (Five Dock), Burwood Road and Liverpool Road (Ashfield)
- Cars are the dominant mode of transport for the area, however car ownership (1.3 to 1.6 vehicles per household compared to the Greater Sydney average of 1.6) and car usage (65% weekday trips in private vehicles) are both lower than the Greater Sydney average
- 14% of average weekday trips by people living in the area are undertaken by train and 2% by bus
- 30% of vehicles on the M4 during morning peak are travelling for work, increasing to 40% during business hours
- 63% of freight in NSW was carried by road in 2011, freight task in NSW expected to almost double to 794 million tonnes by 2031, 'maintaining an efficient and effective road network is vital to support this growth' with limited additional capacity during peak periods
- 13 hours of congestion per day on M4, with average peak speeds to 38km/h on the M4 and 17km/h on Parramatta Road—'Sustained congestion increases the time and cost of travel for freight and commercial movements, reduces the efficiency of freight movements and business travel, and hinders economic growth'
- In 2011 congestion cost NSW $5.1 billion, rise to $8.8 billion by 2020

Social infrastructure ‘has been identified as part of the social impact assessment’

- Seven community facilities
- Eight aged care and nursing homes
- Five primary schools, three high schools and three Kindergarten to Year 12 schools, five childcare centres and one tertiary education provider
- A number of sports and recreation facilities
- A range of health and emergency services
- Religious services
- Shopping areas

Transport – Access and connectivity

- ‘major traffic routes’ are Parramatta Road, the M4, Concord Road and Homebush Bay Drive/Centenary Drive
- In terms of public transport, seven train stations service the area, North Strathfield, Flemington, Homebush, Strathfield, Burwood, Croydon and Ashfield, and it is also serviced by seven bus routes (525, 526, 415, 461, 490, 491 and 492)
- Pedestrians and cyclists are said to have varied conditions, with good conditions existing around residential areas as well as Sydney Markets, Sydney Olympic Park, Rhodes and Burwood having walkable access to rail and bus connections:
- **Pedestrian and cyclist conditions will deteriorate during construction as Bill Boyce Reserve is to be occupied for construction and currently links a pedestrian and cyclist route between the south side of the M4 and a pedestrian bridge**

Five precincts

- 3 of 5 precincts have younger age profiles (Homebush, Concord and Parramatta Road with significantly more aged 18-34), with Cintra Park (‘with more 70 to 84 year olds’) and Wattle Street exhibiting older populations

- Homebush with 'high rates of vehicle ownership and car dependence for travel to work' yet 'higher train use for travel to work', Concord with lower car ownership and car dependence and higher train use to work, Wattle Street with higher rates of vehicle ownership and car dependency to travel to work, and higher bus use to travel to work. Parramatta Road with lower car ownership and usage, and higher public transport use.
- New Parramatta Rd: Draft Parramatta Road Urban Renewal Strategy envisions 'up to 40,000 new dwellings and 50,000 new jobs…generated in the urban renewal precincts' and 'access to public and active transport', three of eight precincts for urban renewal are within the project area (Homebush, Burwood and Kings Bay).

Issues raised by councils within the project boundary (see Appendix M, pp. 61-62 and also Appendix D of the Social Impact Assessment)

(*Editor:Important to note that consultations with Councils were only done on the concept plan. They were not repeated in 2015 after the final route was announced. This is important and explains, for instance, why Ashfield Council did not raise the issue of loss of housing, impact on residents of losing their houses and concerns about loss of heritage. In other words, the Planning Department required Westconnex to consult with Councils but failed to give Councils an opportunity to express their views on the chosen route.*)

Ashfield Council: Impacts on access and connectivity including to social infrastructure and accessibility by pedestrians and cyclists, impacts specific to older residents (such as mobility, safety, connectivity and isolation), increased travel time impacting on health and wellbeing, Parramatta Road becoming even more of a barrier between the north and south sides of the LGA, 'impact on wellbeing of families, extended time away from families due to increased commute', 'health and wellbeing impacts on local residents resulting from tunnel exhaust emissions, as well as visual impacts of ventilation stacks', noise and vibration impacts, and the 'physical and mental health implications of the proposal'

Burwood Council:Increased traffic on local road network (especially during construction as drivers avoid Parramatta Road, and also following project completion), noise, vibration and dust concerns, location of exhaust stacks and associated health concerns for those who live, work or attend school near them, concerns regarding the need for adequate consultation with residents whose properties will be acquired, need to limit negative heritage impacts and retain local character

City of Canada Bay Council: Impact on street trees, potential disbursement of unregistered brothels into surrounding residential areas, benefits to Parramatta Road, property acquisition impacts on community cohesion, noted resident action groups against WestConnex, parking strategy to minimise worker parking in local streets, opposition of Concord Oval for the site of a construction compound—'impacts on national, regional and local sporting teams', air, noise and vibration issues during construction, air and noise impacts during operation

Strathfield Council: Journey disruptions and increased traffic, vulnerable communities will be most affected (such as by access ramps, reduced value of dwellings affecting retirement, further segregation from Strathfield town centre), construction aligning with Ford Factory development leading to traffic problems, Underwood Road traffic problems worsening, impacts on pedestrian access (such as across Centenary Drive), concern regarding ventilation stacks close to residential areas, financial impact of tolls on community members, local heritage and biodiversity impacts, reduced access to residential and commercial areas

Auburn City Council :Impacts to cycleways

Issues raised by social infrastructure consultations (see Appendix M, pp. 63-64 and Appendix E in the SIA) include:

Sydney Cheil Uniting Church: Lost green space and car parking, changed traffic flow, amenity impacts

Wests Tigers: Disrupted training as Cintra Park Hockey Field relocated to St Lukes oval, concern at need to find new ovals, noise, dust and air quality, impacts by construction workers to local roads and parking

The Willows Private Nursing Home: Impacted access for staff, deliveries, patient transport and emergency services, noise impacts and duration of construction works, changed access due to relocation of route 406 bus stop and reduced privacy for residents

Yasmar Training Facility: Loss of accommodation for trainees, changed access due to route 406 bus stop relocation, changed pedestrian access

Haberfield Presbyterian Aged Care: Noise and dust impacts

The Infants Home: Impacts on access and parking, air quality and visual impacts

Haberfield Public School: Impact on children's safety, construction noise and air quality impacts

St Andrew's Anglican Church (Strathfield): Impact to local roads and parking from construction workers, traffic noise impacts on church activities, traffic congestion, noise and parking impacts

Concord Baptist Church: Changed access and air quality impacts from ventilation outlets

Ashfield Bowls Club: Changed access due to bus stop relocation, impact to local roads and parking for patrons and deliveries, amenity and safety impacts and street parking impacts

Assessment of construction impacts

This section summarises the 'potential adverse and beneficial impacts during project construction' as given in Chapter 14 Social and economic, Appendix M (Social Impact Assessment) and Appendix N (Economic Impact Assessment).

WestConnex Development Authority identifies economic stimulus from construction expenditure and employment to 'boost…the economy' and ''Indirect effects' [that] are flow-on effects to the wider state economy, such as increased expenditure and employment within industries that supply to the businesses that directly supply the project with their goods or services', also 'Employment opportunities would grow in the region…increase in demand for labour may increase wages in the region, particularly for construction workers'

Acquisition of properties:
See Table 10.1 taken from Appendix M, p. i

- 291 properties affected in total, 168 that are to be acquired (a 'conservative' estimate—see Appendix M, p. 66), along with partial acquisition of fifteen residential dwellings (though the document states that these partially acquired dwellings will not be impacted). Residents would also be forced to leave 98 properties already owned by RMS.
- 66 residential properties of heritage significance (Appendix M, p. iv)
- About 460 people will be affected through acquisitions
- Table 10,1 states 14 residential homes in Homebush; 46 in Concord; 83 in Wattle Street and 25 in Parramatta Rd.
- All properties to be vacated by the end of the first quarter of 2016, WestConnex Development Authority began acquisitions in 2013, in June 2015 individual property owners were notified that dwellings to be acquired
- 'Significant social risks' (Appendix M, p. 96) from property acquisition include 'inaccessibility of equivalent housing at a comparable cost…relocation health risks…[and] altered access to social infrastructure' as well as potential housing stress due to higher rent or house costs. It is 'expected that the majority of owner-occupiers would aim to relocate within the local area', and effects may be compounded by the timeframe of just 9 months for some households to be relocated, market volatility and reduced housing stock available to relocate into (Appendix M, p. 68)
- The stress and anxiety of compulsory acquisition, or uncertainty surrounding the process, leads to impacts on health, well-being and quality of life, which have been worsened by the uncertainty and the changing footprint of the project with some dwellings originally to be acquired now not, and some originally not impacted now required for the project (Appendix M, p. 68)

- Vulnerable households (e.g. the sick, frail elderly, low income etc) would be most susceptible to these impacts. These risks would also be exacerbated for less vulnerable households, as land acquisition would increase property demand in the local area with some households with only nine months to identify alternate properties.
  Two properties to be acquired in the Concord Road precinct are public housing properties. With already low levels of public housing in the area, this would further reduce the available affordable housing stock locally.(Appendix M p. ii)

- Property acquisition and project development in the Wattle Street Haberfield precinct is expected to exacerbate the severance currently created by Wattle Street, with the potential to negatively impact on local community cohesion.

- Also 23 commercially zoned properties and one residential zoned, with a total of 20 commercial buildings to be acquired.

'Overall it is anticipated that the social impacts of relocating for many of the directly affected households would be major short-term impacts. In some cases, where households are unable to relocate locally, the social impact may involve an extended recovery time to re-establish social networks and daily routines for work, study and recreation. Alternatively, where households need to incur higher levels of debt in order to remain in the local area, increased mortgage or rental stress may result in greater and longer term social impacts'

(*Editor: This clearly identifies signficant social impacts but lack depth of information about the actual risks because no research was done on the ground on this aspect by the consultants.*)

Changes in amenity

Three years of noise and vibration impacts, which are stated to 'cause stress and anxiety, affect the enjoyment of outdoor spaces and disturb normal indoor activities…[and] interrupt sleep patterns, with consequent impacts on health and wellbeing', and 'In locations where the tunnel is less than 40 metres deep' such as at Concord Road, to the east of Burwood Road, to the south of Parramatta Road, Ashfield and at Wattle Street 'there is the potential for ground borne noise to exceed noise criteria for longer periods', up to 2 weeks, only to conclude: 'More consideration of management measures would be required during detailed design to minimise and mitigate these impacts'

Noise impacts also associated with construction traffic have the potential to affect local roads (see Appendix M, p. 85)

Given 'the potential for exceedance of night time noise criteria at some construction compound sites', and the 3 year construction timeframe, property treatments or alternate accommodation for residents might be necessary (see Appendix M, p. 85)

Visual environment also changed – which 'affect[s] how and where [residents and workers] choose to travel and relax, both at home and outside the home, how they enjoy outdoor areas, and how much they identify with their environment. This relationship to environment

therefore has strong links to physical and psychological wellbeing.' Measures to avoid, mitigate and manage amenity impacts are given as important for community health

Major amenity challenges will relate to 'removal of existing vegetation and loss of resultant visual amenity' and 'properties overlooking construction compounds and work sites.'

There will be effects through changes in amenity on businesses, especially but not limited to 'outdoor restaurants and cafes, hotels and pubs, childcare centres and aged care facilities'

'…impacts on residences adjacent to the Pomeroy Street construction compound, Underwood Road tunnel and civil site and Concord Road civil and tunnel sites, would experience high visual impacts. Residents in Wattle Street, Walker Avenue, Ramsay Street, Martin Street and Dobroyd Parade would also experience high visual impact due to their proximity to multiple project elements' (Appendix M, p. iv, see also Appendix M, p. 86)

Heritage of the local area will be greatly affected by the project (Appendix M, pp. 86-87):

Much of the western Concord precinct is part of the Powell's Estate Heritage Conservation Area (HCA), 11 properties to be required are in this area and 2 are items of local significance (Canada Bay Council Local Environmental Plan 2013)—representing 'a major adverse impact on the heritage significance of the Powell's Estate HCA.'

53 residential properties to be acquired are part of the Haberfield Heritage Conservation Area, 'the impact of the project on the heritage significance of the Haberfield HCA and individual heritage items would be significant.'

2 properties acquired in Chandos Street (Parramatta Road precinct) are heritage items on the Ashfield LEP 2013 and the historical importance of the Federation-era streetscape in which they exist would decrease due to their demolition

Changes to accessibility

Despite '14.2 Existing environment' outlining that there is limited additional capacity for Parramatta Road given current congestion levels, the effects of a 2% increase in traffic on Parramatta Road due to construction road users is not considered an accessibility issue of the project

The construction force is also expected to increase traffic volume on surrounding local streets

The surface construction will impact on property access, pedestrian and cyclist movement, bus stop locations, local roads and intersections and travel times, with journeys affected by traffic delays and detours

Most heavy vehicles to access the construction facilities from roads including Parramatta Road, M4, Concord Road and Wattle Street

Local roads to be impacted temporarily during construction are (see Table 2.3 Appendix M, pp. 16-17 for more details): Pomeroy Street/Wentworth Road South intersection, Underwood Road, Sydney Street and Queen Lane, M4 east of Sydney Street off-ramp, Northcote Street, Ramsay Street, Martin Street, Walker Avenue, Chandos Street, Parramatta Road (between Orphington and Bland Streets) and Orphington Street. Also permanent alteration or closure to a number of streets (see Appendix M, pp. 17-18)

Additional accessibility issues include:

Short-term closures to the pedestrian bridge over the M4 at Pomeroy Street and the Bland Street pedestrian Bridge with 'short-term access issues'

Insufficient parking will be provided for construction staff, and given that 'the availability of on-street parking is a pressing local issue' a construction car parking strategy would be developed

Existing M4 cycleway to be closed between Haslams Creek (Newington) and Concord Road

Traffic delays will affect all road users (motorists, bus passengers, cyclists and pedestrians), impacts will include:

Slower buses, slower access to bus stops (4 stops relocated), reduced public transport reliability, reduced amenity for bus users

Reduced pedestrian safety (temporary closure of footpaths along Wattle Street, Martin Street, Parramatta Road and Chandos Street) and increased wait times at signalised intersections

Increased journey times and distances due to closed road shoulders and detours

Reduced overall amenity throughout the study area

Impacts on businesses reliant on deliveries

Longer journey times and decreased efficiencies for freight and commercial vehicles during construction

The need for some alternative access to local properties

No evaluation of these impacts is given against the 'Impact assessment rating criteria' as given in the Methodology section

Health of the community (MISSING IN CHAPTER 14):

‘worst case assessments without mitigation would likely generate health impacts for some receivers during some works. Loss of use of outdoor areas, disturbance of sleep, reduced capacity for concentration, with speech and other activities would be likely with potential for effects on cardiovascular health if elevated noise at particular locations occurred for extended periods.’ (Appendix M, p. 87)

‘Negative health impacts may occur as a result of traffic changes during construction, property acquisitions, visual changes, noise impacts and changes in access/cohesion of local areas. These may result in increased levels of stress and anxiety. Those most vulnerable to these changes are likely to be the elderly and people from non-English speaking backgrounds.’ (Appendix M, p. 87)

Changes to social infrastructure involves direct impacts on: (see Table 14.8, Chapter 14)

Strathfield Girl Guides Hall (acquired, all users temporarily relocated)

Bill Boyce Reserve (100% leased as a construction ancillary facility, closed to public for the entire project)

Arnotts Reserve (some area currently not accessible to public used during construction, though visual amenity reduced and noise and visual impacts on currently used Arnotts Reserve north of the M4)

Sydney Chiel Uniting Church (partial acquisition along the Concord Road frontage involving loss of greenspace, a playground, parking space and changed access—parking and greenspace areas of greatest concern for church community)

Cintra Park (acquired, currently a hockey field, to be relocated, increased travel times for people accessing Concord Oval and St Lukes Park due to a substantial increase in vehicles entering the Cintra Park compound via Gipps Street)

Reg Coady Reserve (directly impacted during construction, 18% of the reserve used during construction and 12% lost permanently, with adjacent parkland subject to noise, visual, and other amenity impacts)

Zongde Temple (acquired, 2,000 people served by it, inconvenienced as they are relocated)

Changes to social infrastructure will have ‘indirect impacts’ on the following:

(see Table 14.8 and Appendix M, pp. 76-81 for additional details)

Our Lady of Assumption Catholic Church; St Michael's Serbian Orthodox Church; Concord Baptist Church; St Andrew's Anglican Church; Jehovah's Witnesses Church; The Infants Home; Haberfield Public School; Willows Private Nursing Home; Haberfield Aged Care; Peek-A-Boo Early Learning Centre; Ashfield Park and Bowling Club and Yasmar Training Facility

Business impacts

'For the purpose of the EIA, an affected business has been defined as a business that would be impacted by property acquisition, changes in amenity, changes to accessibility or changes in the volume of passing trade due to the construction and operation of the project'

20 business buildings fully acquired (one motel, 4 offices, 9 auto sales/services, 1 personal services, 3 homewares, 2 retail)

Business impacts identified in Appendix N (p. 6-4) relate predominantly to:

- Increased noise and vibration due to plant and equipment or road traffic noise
- Changes in local air quality due to dust emissions
- Changes in visual amenity close to businesses

Specific business impacts will include (see Appendix N, p. 6-5)

- DFO (Homebush) carpark affected by dust, noise and visual amenity due to adjacent construction works
- Ashfield Bowling Club affected by dust levels, noise and visual amenity—especially on bowling greens, though these are located on the other side of the clubhouse to construction
- Businesses along Parramatta Road (such as commercial and car yards), along Powell Street and in the Bakehouse Quarter (North Strathfield) impacted by changes in amenity

Impact largely determinant on construction hours, length of construction, activity undertaken, proximity to project and nature of business

And also business impacts relating to accessibility (see Table 6.2 in Appendix N, pp. 6-7 to 6-9 for further details):

Increased congestion impacting delivery times, freight movement, customer travel times and destination decisions

Changes in parking availability

Changes in pedestrian or cycling arrangements affecting staff and customers

A car parking strategy will be developed and deliveries to/from businesses are not anticipated to be effected

Consultation led to the following business impacts or concerns being raised (from Table 5, Appendix N, p. 5.1), though note no specific consultation was undertaken for the EIA:

- Impacts to local business due to acquisition, disruption due to construction and changed conditions leading to business viability issues
- Impacts of noise, vibration, dust and air quality and construction traffic on businesses -'Potential impacts on access arrangements for commercial operations including deliveries and customer access by foot, bicycle and private vehicle.'
- 'Potential impact on access for customers and deliveries due to construction traffic.'

Assessment of impacts during operation

This section assesses the impacts of the project during its operational life in 'Chapter 14 Social and economic', Appendix M (Social Impact Assessment) and Appendix N (Economic Impact Assessment).

Economic stimulus:EIS claims that operational expenditure and employment will add $39 million to the NSW economy through increased industry output, $9m through increased household income, 110 increased full time equivalent employment positions and $18m in 'value added'

Changes in amenity:Positive changes given as visual benefits and reduced noise due to less traffic along 96% of Parramatta Road and the M4

Negative aspects of surface works are given (with minimal detail) as loss of vegetation screening, new road infrastructure – interchanges, tunnel ramps, bridges/flyovers and new noise walls, closer proximity to new road infrastructure for some properties, ancillary operation facilities such as ventilation facilities, the motorway control centre, electricity sub-stations and the water treatment facility, loss of heritage items and changes to streetscapes

4% of receivers used for noise testing found noticeable noise increases—in some cases 'increased outdoor noise levels may result in increased levels of stress at individual properties' (Appendix M, p. vi).Measures at certain properties will need to be taken

Given the above amenity points, important to consider that **'changes to the amenity of a street or suburb can negatively impact the sense of belonging and identity of its residents and consequently their cohesion and connectedness. Areas with heritage value can also be a significant contributor to local character and community sense of place. Impacts on heritage assets affect not only the value of the assets, but the value communities place on the quality of their environment, and their connections to it, both past and present'** (Chapter 14, p. 25)

'Businesses located along Parramatta Road, east of Concord Road and not located adjacent to

the eastern or western portal, would experience reduced noise levels, improved air quality and improved visual amenity due to the reduction in vehicle numbers, particularly heavy vehicles on Parramatta Road. Businesses located at the eastern and western portals and west of Concord Road are likely to experience increases in noise, reduced air quality and reduced visual amenity due to increased traffic volumes and the introduction of new infrastructure.' (Chapter 14, p. 25)

Freight and efficiency

Full benefit predicted to be fully realised when/if other stages of WestConnex completed

Changes in passing trade

19% loss of output and full time employment for businesses along Parramatta Road due to reduced passing trade, equivalent to $7.3 million output

'This assessment does not take into account the potential increase in passing trade for businesses along Parramatta Road, west of Concord Road, from an increase in traffic volumes associated with drivers choosing to avoid the motorway tolls. Five businesses were identified as potentially benefitting from an increase in passing trade, comprising service stations, a car wash and cafes/restaurants.'

Changes to accessibility

'…in the medium term, before the construction of the proposed future M4-M5 Link, congestion would increase in some areas, particularly on Parramatta Road east of the project' (Appendix M, p. vi) — with construction traffic leading to a peak of 1,260 heavy and 920 light vehicles per day (Appendix N, p. 6-6)

Reductions in traffic delay between Homebush Bay Drive and City West Link and Haberfield/Leichardt, reduced traffic on Parramatta Road between the M4 and Dalhousie Street.

Worsened traffic conditions elsewhere, especially M4 project ramps at Parramatta Road and Dobroyd Parade.

Reliant on M4-M5 Link (subject to planning approval) to fix 'much of this congestion'

Medium term traffic impacts on local and regional access to Parramatta Road, increasing travel times

Peak morning travel times reduced by just 6-8 minutes before construction of the M4-M5 Link, then if the Link is constructed time savings increase to 10-18 minutes (again, dependent on a separate project subject to planning approval)

The project might allow for the provision of a bus route through to Burwood from the CBD — **'Improvements in public transport availability and efficiency would have broad social benefits. The use of public transport includes incidental exercise (eg walking to and from bus or train stops), increasing the chance of travellers meeting recommended daily physical activity targets. A more active lifestyle can help reduce the risk of preventable diseases,**

including coronary heart disease, stroke, type 2 diabetes, obesity and some cancers. It can also help improve mental health, community life, social wellbeing and community safety' (Chapter 14, p. 27)

'Parramatta Road is a major transport corridor that has multiple bus routes. The study area is also well serviced by the rail network with seven stations within walking distance of the construction sites.' (Appendix M, p. 15)

Improved urban amenity and cycling infrastructure could attract more cyclists, but this assumes that amenity will increase (it will decrease at least during construction—see section 14.3.3) and that cycling infrastructure would be implemented in the future

Yet despite the 'broad social benefits' of public transport given above, 'The project would modify pedestrian and cyclist access at the Concord Road interchange. Access would be most affected for residents and those moving between the north and north-east of the interchange and the south of the interchange, including the southbound bus stop on Concord Road. Travel distance would increase due to the need to travel around new project element such as the onramps. Together these changes would potentially reduce ease of access for public transport users travelling to/from the north and north east of the interchange, particularly in relation to accessing the bus stop which provides connections to Strathfield and Burwood. As walkable bus stop catchment areas is generally regarded as 400 metres, increasing walking distances beyond these could create a disincentive to public transport use.'

In terms of property access, Sydney Cheil Uniting Church's historic entrance will be acquired, and changes made to the Sydney Street access, while apartments at 98 Chandos Street (Ashfield) will have access road relocated and offset

Visual and heritage impacts from operation of the project will include loss of vegetation screening, new road infrastructure, closer proximity to road infrastructure for some properties, the impact of ventilation facilities, the motorway control centre, electricity sub-stations, and a water treatment facility, and lost heritage items and changed streetscapes (Appendix M, pp. 92-93)

'Changes to the amenity of a street or suburb can negatively impact the sense of belonging and identity of its residents and consequently their cohesion and connectedness. The heritage values of areas such as the Powells Estate in North Strathfield and Haberfield, are also a significant contributor to local character and community sense of place. Impacts to heritage assets affect not only the value of the assets, but the value communities place on the quality of their environment, and their connections to it, both past and present.' (Appendix M, p. 93)

Social infrastructure that will be affected for the duration of the tunnel's operation

Homebush precinct
Our Lady of the Assumption Catholic Church on Underwood Street; HomebushStrathfield Girl Guides Hall;Bill Boyce Reserve (returned following operation)
Powells Creek/Arnotts Reserve (Powells Creek overshadowed by on-ramp)

Concord precinct
Sydney Cheil Uniting Church (faces reduced visual amenity, increased noise, reduced parking, close to new tunnel, ramps and a noise wall)

Cintra Park precinct (operational aspects including smoke extraction facility, a water treatment facility and an electricity distribution substation, with 'minor' visual changes, construction car park available post-construction)

Wattle Street precinct (1,813m2 of Reg Coady Reserve permanently lost, which 'is not considered to be a significant impact on the availability of open space in the local area' by WestConnex Development Authority)

Parramatta Road precinct

Zongde Temple permanently relocated

Effects on Haberfield Aged Care, Peek-A-Boo Early Learning Centre, Willows Private Nursing Home, Yasmar, Ashfield Park and Ashfield Bowling Club, all adjacent or near to the project site, are expected to be **'minor–moderate'** by WestConnex Development Authority, but no further details are given

Impacts on Human Health during operation

'Air quality impacts are of significant (community)concern with regard to this project…The project is expected to result in a redistribution of impacts associated with vehicle emissions' so that some areas will experience reduced pollution levels, while in others that experience higher surface traffic volumes 'a small increase in pollutant concentration may occur.' (Appendix M, p. 93)

Editor: This section merely restates what is in other reports. These statements are contested by critics

Impacts on business during operation

Concerns were raised about potential business impacts during operation of the project (see Table 5.1, Appendix N, p. 5-1) during consultations although note that no consultation was conducted specifically for the Economic Impact Assessment.

- Impacts of tolls costs on residents,
- Loss of trade due to reduced passing traffic, including impacts to advertising and ability to attract passing trade
- Acquisition effects on local businesses
- loss of amenity from proximity of tunnel entry / exit points, road widening and ventilation outlets to businesses'

Social impact report concludes: 'Overall, it is anticipated that businesses located in the vicinity of interchanges may experience adverse amenity impacts due to the introduction of new infrastructure and changes in noise levels. However, some businesses located along Parramatta Road between Concord Road, Concord and Wattle Street, Ashfield, and away from the interchange sites will experience improvements in amenity due to the removal of a significant proportion of heavy vehicles along this section of Parramatta Road resulting in improved air quality, visual amenity and noise levels.' (Appendix N, p. 7-5) (*Editor comment:This conclusion is dependent on accuracy of traffic predictions*.)

'Worst case scenario' modelling — $7.3million and 33 full time equivalent jobs lost due to loss in passing trade, or 19% of total output of businesses reliant on passing trade—but based on estimates rather than actual calculations (Appendix N, p. 7-3)

Editor:Do readers think this is accurate?

Linkage or flow-on effects of impacts of these businesses shutting down are not considered [but are assumed 'likely to be minor' by WestConnex Development Authority]

Changes in accessibility due to changes in access arrangements for pedestrians, cyclists or vehicles

Cumulative impacts associated with other major infrastructure projects in the region, specifically the M4 Widening Project and the Parramatta Road Urban Transformation Program.'

'Rat-running' will be an outcome of the tolls imposed for the M4 – East project, whereby local streets are used by through-traffic to avoid toll ways.

'The implementation of tolls on the M4 and M4 East to recover the capital costs of construction and the operating and maintenance costs of the projects will result in a number of motorists that are unwilling to pay the toll to divert onto Parramatta Road or other alternate routes. Commercial vehicles and freight operators using these roads can either pay the tolls and benefit from decreased travel time, increased efficiency and reductions in vehicle operating costs, or choose not to pay the toll and experience longer travel times.' (Appendix N, p. 7-2)

Assessment of cumulative impacts

This section summarises the impacts' cumulative effects on social and economic factors as identified in 'Chapter 14 Social and Economic', Appendix M (Social Impact Assessment) and Appendix N (Economic Impact Assessment).

Cumulative Impacts of Construction

Cumulative impacts most likely to occur according to WestConnex Development Authority will be because of concurrent construction activity (such as new M5 and M4 widening)—employment and economic stimulus opportunities, increased local employment opportunities, potential higher wages for construction workers, opportunity for local businesses to supply the goods and services

'Construction of the project and M4 West (Parramatta to Homebush) would overlap, resulting in extended durations of construction impacts. At a local and regional level, for commuters, public transport users, pedestrians and cyclists, social impacts related to travel delays, diversions and inconvenience, exposure to visual and noise amenity impacts would be prolonged' (Appendix M, p. 95), up to 5 years (Appendix N, p. 6-10)

'Businesses and key centres located in the areas of overlap with the M4 Widening and the M4 East projects (particularly around the M4 and Homebush Bay Drive) are likely to experience traffic delays for customers and staff, extended periods of amenity impacts due to increases in noise, increases in dust levels and changes in visual amenity due to the construction of these projects. This is also likely to affect key centres such as Flemington Markets and the Sydney Olympic Park precinct. The M4-M5 link is scheduled for construction from 2019 to 2023; this project may also result in construction fatigue for businesses and road users in areas of overlap.' (Appendix N, p. 6-9)

During cumulative construction, there could also be construction fatigue for users and motorists of the M4 due to the length of the project (4 years), increased travel times along Parramatta Road and M4 and impacts on freight movements

Cumulative impacts of operation

The only cumulative impacts of the operation of the M4 – East project that are provided are those that consider the wider WestConnex project and the Parramatta Road Urban Renewal Project, and all given are positive

The cumulative impacts listed here include a reduction in traffic along Parramatta Road (and the combination with the Parramatta Road Urban Transformation Program to improve amenity and accessibility), benefit to the freight link (again looking at the entire WestConnex project), urban renewal projects that will be possible because of the project (but that also require the Parramatta Road Urban Transformation Program/another section of WestConnex to be completed), faster and more reliable public transport along Parramatta Road and increased active transport

'Increases in traffic volumes are expected on Parramatta Road, between Concord Road and Homebush Bay Drive and on Parramatta Road east of Ashfield until 2023 when the M4-M5 Link is anticipated to open. This increase in traffic has the potential to impact on access to businesses along these sections of road due to increased congestion. The additional traffic and the resultant increase in congestion are not considered likely to have a significant impact on businesses along these sections of Parramatta Road.' (Appendix N, p. 7-6)

Management of impacts

This section describes how impacts will be 'managed' through engagement and defined actions.

Ongoing stakeholder engagement

'Stakeholder and community involvement in program planning and ongoing environmental management would be key to avoiding, minimising and mitigating the social impacts of the project'

Editor: What is their record so far?

'The framework would ensure that local residents, businesses and workers are provided timely and clear information about local changes and the progress of construction and operation. Project communication would need to consider the cultural and linguistic diversity in the project area, so that project information is communicated effectively'

Editor: Emphasis added – what has been their record on this so far? There have been many community complaints about this

'The [community consultation] framework should also provide opportunities for local communities and specific key stakeholders, discussed in the social impact assessment, to have input into the development and refinement of construction management plans, and for the use and management of residual lands on operation. The -framework would also provide for community feedback or monitoring by telephone and online.' (Chapter 14, p. 30)
Editor: What has been experience so far of this?

Management of impacts specific to social or economic impacts

Construction phase (see Appendix M, pp. 96-98 and Appendix N, p. 7-9)

- Property acquisition (relevant legislation and documentation cited, relocation support services, WestConnex Assist counselling program continued, first language support promoted)

Editor: Have these things happened? If not should be spelled out in submissions

- Relocation (assistance is to be provided to those forced to relocate)

Editor:How effective is this? Does it exist?

- Access and connectivity (construction traffic management plans developed, community communication strategy to be developed, relocation of Orphington Street bus stop, advertising bus stop changes locally and signage applied for motorists, 'explore the options' for pedestrian and cyclist connectivity along M4, develop car parking strategy, and notify local stakeholders of traffic management procedures)

- Amenity – visual (local beautification and communication, consultation regarding public space use [residual land from construction], support of local community development activities)
- Amenity (noise and vibration actions given in Chapter 11, visual given in Chapter 13 and air quality in Chapter 9)
- Business impacts (acquire businesses under relevant legislation, business management plan developed, 24 hour project information line and website maintained to respond to business owners' concerns)
- Social infrastructure ('consultation' to continue to assist people to plan for and adapt to changes expected, emergency services will be notified of any traffic, access and route changes, alternative land will have to be found for the Cheil Church, Strathfield Council and Strathfield Girl Guides will be required to access temporary premises, Zongde Temple will need help finding both temporary and permanent site, Bill Boyce and Reg Coady reserves will have to be returned to at least pre-construction condition, consultation will be undertaken regarding respite periods for social infrastructure providers such as aged care and child care providers, Concord Oval and St Lukes Park users will be consulted)

During operation of M4E tunnel (see Appendix M, pp. 98-99 and Appendix N, p. 8-2)

- Access and connectivity (opportunities for pedestrian and cyclist accessibility explored, Transport for NSW consulted regarding improved pedestrian access at Concord Road Interchange with a focus on bus stops)
- Amenity – noise and vibration (long-term impacts addressed through community grants given to councils or local community groups)
- Amenity – visual (local beautification of operational facilities, community events, 'legacy projects' and tree planting)

Editor:What are legacy projects?

- Acquisition (carry out acquisition under relevant legislation)

One thought on "**Summary of M4EIS – Social and Economic Impact reports**"

1. **What do you think about Westconnex Aecom's EIS Social and Economic Impact report?**
   | **m4 eis** says:
   04/10/2015 at 5:35 pm Edit

   […] is still a lot of reading so the People's EIS has provided a summary of the Chapter in the main report and two large appendices with some page references back to the reports. Although they are hundreds of pages, the reports are repetitive, regurgitating […]

Reply (http://m4eis.org/2015/10/04/summary-of-m4eis-social-and-economic-impact-reports/?replytocom=56#respond)

Blog at WordPress.com (https://wordpress.com/?ref=footer_blog). The Big Brother Theme (https://wordpress.com/themes/big-brother/).

A People's M4 EIS

Dr Victor Storm – response to Westconnex M4 East EIS

01/11/201501/11/2015 wendybaconblog Commentaries & Objections "Black Box" model, AECOM, Ashfield, business case, diesel trucks, Dobroyd Parade, Dr Victor Storm, Haberfield, health impacts, NSW Register General, Particulate Matter, PM2.5, Psychiatrist, Respiratory illness, Social and Economic Impact Assessment, Urban Conservation Area, Wattle Street.

Introduction

I write this from several perspectives. I am a resident of Haberfield and work locally. I am a registered medical practitioner with specialist qualifications in both child & adolescent and general psychiatry (FRANZCP) and public health medicine (FAFPHM). Additionally I am a graduate of Harvard University in public administration (MPA) and of the Australian Institute of Company Directors (GAICD).

This document summarises my objections to the recently published EIS for the M4East proposal. It concentrates on aspects of the health and social impact, including social & emotional wellbeing of residents as a consequence of the M4 East proposal. This along with linked projects, the M5 East duplication & the M4-5 link projects are the bulk of the 33 km long road & tunnel project, collectively known as WestConnex.

- General concerns about the flawed consultation and governance
- Initial impacts of the project to date
- Construction related impacts
- Post construction impacts
- Multiple unanswered questions or deficits in the current EIS

1.General concerns about the flawed consultation and governance

Individually and collectively these projects have already impacted on the social and economic life of residents and workers in the inner west, since the current proposal was first mooted in late 2013. In particular, the M4 East project impacts heavily on the residents and businesses around Homebush/North Strathfield & Concord and its Western end and Haberfield/Ashfield & Croydon at its eastern end.

In addition the proposals for this project occur while there are other significant proposals that are affecting residents in the inner west.

- The first are the NSW Urban growth proposals for the Parramatta Road Corridor, with five of the eight proposed growth precincts within the inner west, coupled with the Bays precinct and the Central to Eveleigh project. Together these projects will have substantial influences on the character, built environment and population make-up of the inner west

- The second are proposals for forced amalgamations of local councils. Many residents are concerned that this will mean local affairs will be managed by large distant bureaucracies. There is a real sense that local decision-making and democracy is being removed from residents by this enforced process. There is also great frustration that decisions affecting the lives of people are being made by a government that has shown no interest in the impacts these decisions have on the lives of local people. There has been no attempt by the Premier nor relevant Government ministers to actually visit the sites of where residents are being forced from their homes. They have not justified why it is necessary to destroy vibrant communities. Nor have they proposed adequate mitigation of these impacts on the lives of individuals, families, friends and community.

I object to the proposal because it has not been presented in a way that enables the public to determine if the proposal is an appropriate and effective solution for Sydney's significant transport problems.

These combined sets of factors have left local residents feeling sad and angry about the process to date, and many feel sceptical about there being any real concern for their rights and welfare by the NSW and Federal Governments or their agencies.

In addition no comprehensive business case has been presented and the arguments in the 5000 page EIS are simplistic and lack depth. Critic such as the NSW Auditor-General and MLC Ms Mehreen Faruqi have seen the business case and have made strong arguments against why they consider it to be a flawed process and proposal. There has been no serious rebuttal from the proponents, which suggests that the critiques are accurate and that the whole process is flawed. If this was private company seeking to use shareholder funds, the lack of a publicly available business case would be disturbing for shareholders. With the M4 East project it is

public money that is being proposed for investment. The scheme proponents are keeping the public in the dark about their financing methods and the economic rationale for using public funds in the manner proposed.

I object to the fact that public money has been used to establish a private company, with 2 ministerial shareholders, so that the corporation does not have to be publicly accountable. The opportunity costs of this project and the alternatives that could be developed by equivalent investment have not been tested in public.

I object because the whole planning and tender is a corrupted process. The process has not been transparent and the proponents and financial beneficiaries of been intimately involved in the process of "evaluation" and marketing of the project to the public. There has been no independent analysis or arms-length review, such as a treasury gateway process. This is further evidenced by the awarding of contracts for the project, notice of compulsory acquisition of family homes and the planned destruction of local communities; all before the matter has been properly considered and approved. It is also evidenced by the unseemly haste in which the EIS has been prepared and the even further "haste" with which the community is expected to respond to a very large and multilayered set of documents.

I object that the EIS has in large part been prepared by AECOM, whose reputation for impartial independent advice must be in serious question. How can the public have any confidence in a company that has recently settled claims against it with a $280 million settlement because of inaccurate traffic forecasting for the RiverCity tunnel project in Brisbane?

The most disturbing outcome of M4 East proposal, coupled with the other assaults on community rights and the ability of the public to engage in decision making about their city, is the further distrust about governance and probity in NSW. The planning and development process of the M4 East project smacks of back room deals hidden behind the cloak of "commercial-in- confidence concerns", so that the public who pays for this are not truly involved in the decision making. This is a fundamental core of my objection to what appears is a flawed proposal.

2 Initial Impacts

I object to how this process has been managed, since its inception, including poorly run community "engagement". The "consultations" appeared more concerned with the marketing and media spin, rather than provision of information. If we were watching an episode of the television series "Utopia", the dark humour may be appreciated. However the cruel impact of decisions, made by people who do not have to live with the consequences, is very disturbing for those that suffer the consequences.

The initial announcement of this project was made in the last quarter of 2013. The WestConnex Delivery Authority (WDA) conducted a series of information sessions near the proposed concept route. At that time, many local residents and businesses received letters that their homes/ buildings would probably be resumed for the project.

These “consultation” sessions were characterised by what many residents in Homebush, Concord, Ashfield and Haberfield characterised as contradictory and misleading information. On multiple occasions attendees reported that they received contradictory answers t the same questions from different staff at the information booths.
There was considerable distress amongst older residents at the prospect of being forced from their homes to an unknown and uncertain future.

There was an immediate deflation on local real estate prices in the affected areas. Many property owners who have rental properties were not directly advised of the property resumption intention. Many discovered from tenants about the WDA property resumption plans. In some instances the owners discovered the resumption plans when their tenants gave sudden notice. Other long-term owners in Haberfield and Concord were pressured to sell their properties for low prices, by WDA/RMS agents.

Many businesses faced uncertainty about their prospects and found that trade reduced quite quickly through 2014.The proposed resumption and demolition of a family run motel on Parramatta Road will be significant loss for the district.

In mid 2015, a large number of residents who had lived for over 18 months with the apprehension of their homes were to be compulsorily acquired, were suddenly advised that their properties were no longer required. Others who had not had any such notice received letters stating their properties would be resumed. This occurred in Ashfield and Haberfield. The cumulative and individual impact of proposed resumptions in Haberfield and Ashfield is significant. There is no proper analysis of this in the EIS. Many core agencies have not been consulted prior to the EIS. Some schools, local chambers of commerce and local social infra-structure providers have only been consulted since the release of the EIS. Others have not been consulted at all. Hence, the social impact assessment is seriously deficient and inadequate.

- **Lack of analysis of the Socio-economic impact**: The EIS identifies the social impacts on individual finances, health and loss of equity caused by compulsory land acquisition. It also concludes that this disadvantages the sick, frail, elderly and poor. It also concludes that property owners who seek to find property in the district are also disadvantaged by the limited time available to find suitable property. The remedies offered in the EIS are limited and does little to identify how local residents can be properly supported. It appears to conclude that any social impact is just necessary collateral damage. There is no detailing of the socio-economic cost of these impacts. These need to be appropriately estimated and considered within a comprehensive social impact statement. **Those disadvantaged by the proposed measures must have appropriate financial restitution to compensate for current and future losses.**

- **Demolition of Apartments and social housing stock:** One impact particularly for Haberfield/Ashfield and also Concord is the proposed demolition of many apartments and social housing blocks. Haberfield will lose over 50% of its apartment dwellings, many of which house long term residents who are single people, elderly and others with special disability needs. There is little if any equivalent stock available for them to purchase or rent nearby. Many of the people being forced out their homes will have to find a new home some distance away from their established communities, in which they have lived for years. Compulsory acquisition processes are already being implemented on local residents. Families, friends and neighbours are being separated. So while the impact is most

significant for the 400 or more people who are being forced to move, it also affects the thousands who remain behind in their once shared community. **Housing stock needs to be replaced and made locally available for people on low incomes.**

- **Supports for those affected by proposals:** The EIS suggests WestConnex would offer a counselling service to those impacted. This is a somewhat akin to a person assaulting another and then offering counselling to the assaulted person! The only reasonable support to offer is independent financial, legal, counselling and social support to affected people. **There must be payment of full and appropriate sums to compensate for all imposed losses.**

Destruction of Urban Heritage in Historic Conservation Area: The heritage report identifies that many of historic houses that are slated for destruction are in Haberfield and Ashfield. It will result in a permanent scar on the historic fabric of the world's first garden suburb and also cut off the western corner of the suburb from the rest of this treasured precinct. The EIS states that this proposal will have a major adverse impact on Haberfield and the overall project will have a major cumulative impact on the Haberfield Conservation Area. It does not propose any mitigation or restitution for this loss. (Definition of Major Adverse Impact p 19-11, Table 19-4 EIS Section 1B: "Actions that would have a severe, long-term and possibly irreversible impact on a heritage item. Actions in this category would include partial or complete demolition of a heritage item or addition of new structures in its vicinity that destroy the visual setting of the item. These actions cannot be fully mitigated.")

- **Loss of Community**: The EIS itself says in 14.4.2, "Changes to the amenity of a street or suburb can negatively impact the sense of belonging and identity of its residents and consequently their cohesion and connectedness. Areas with heritage values can also be a significant contributor to local character and community sense of place. Impacts on heritage assets affect not only the value of the assets, but the value communities place on the quality of their environment, and their connections to it, both past and present." "These impacts are primarily along the M4 corridor in Homebush at the western and eastern ventilation facilities, Concord Road interchange, and Parramatta Road and Wattle Street interchanges." It describes that the impacts for Haberfield are "major adverse impacts" with the whole project having cumulative adverse impacts. **It proposes no solution or restitution for this impact. This is not acceptable.**

- **Ongoing implied forced acquisition of property prior to any official approval for the project**: in the last 3 weeks residents and businesses in Haberfield & Ashfield have received compulsory acquisition notices (PANS), which set a 90 day time frame for a negotiated settlement to be finalised, before legal proceedings would commence. Residents, who have lived their whole lives in the district, are being forced from their homes, often with what is considered inadequate funds to secure housing within the neighbourhood. Residents report that RMS staff are behaving in a forceful and what some consider a bullying manner towards them. They find it difficult to understand that as the EIS has just been released for community consultation, planned acquisitions are being forced through, prior to any formal approval and prior to any proper consideration of community submissions and concerns. Many believe the EIS process to be a sham formality. All property acquisition processes must cease until there is full release of the Business case to parliament and the public to allow appropriate analysis of the M4 East proposal and for transport alternatives

to be properly considered. **This must include a full socio-economic impact analysis that accounts for the true costs of the project and does not hide the costs borne by individuals if the M4 East project were to proceed.**

(https://m4eis.files.wordpress.com/2015/11/posterinhaberfield.jpg)

Poster in Haberfield Shopping Centre

3 Construction related impacts

The size of the project is huge with a reported 65 hectare (650,000 square metres) project footprint. This includes clearance of 13 hectares of vegetation and established tree cover. I object to the removal of established trees and vegetation for this project and in particular the proposed destruction of healthy iconic trees in the Reg Coady reserve.

- **Noise and Dust:** The EIS discusses a construction period of 3 years. It proposes a plan for 24 hour operations of heavy truck removal, with many places experiencing 20-40 heavy truck movements an hour 24 hours a day, as over 1.7 million cubic metres or some 16 million tonnes of spoil are removed. It is also proposed that trucks run up and down Wattle Street adjacent to residential areas where traffic is usually light between 9 pm & 6 am. **I object to the proposed 24 hour spoil removal by truck. There must be respite from this process, from 9pm to 7am.**

- All the trucks from Haberfield/Ashfield would congregate in Concord through Homebush and beyond for 24 hours a day, subjecting many people along that corridor to extended period of noise & dust. Current proposed mitigation measures for this cumulative impact is inadequate. **Appropriate noise mitigation through double glazing and sound proofing on individual homes is required. Trucks must be fully covered and all trucks should washed, on the body of the truck and around the wheel bay & tyres, before entering road ways and distributing silica based dust. This will also require installation of high capacity dust filtration on air-conditioners. The capital and recurrent operating costs should be borne by WDA/SMC**

- **Vibration & potential damage to homes: There is significant local resident concern on the impact of tunnelling beneath and around properties and the possibility of structural damage to old homes.** The assessment of properties for which structural condition reports are provided needs to cover a greater area than is proposed in the EIS. There must be independent structural assessment of all houses in the region of the proposed tunnelling and blasting (within 200metres either side of the tunnels and construction areas). All damage must be compensated with full remediation.

- **Destruction to Neighbourhood and Community:** The grief and mourning caused by the forced breakup of family kinship and community ties will be long-lasting and inter-generational. **If the project proceeds a health monitoring study must start now and monitor the health and well-being of all local residents who remain and those displaced to ensure that health impacts are kept under close scrutiny.**

(https://m4eis.files.wordpress.com/2015/11/haberfield-home.jpg)

Health Impacts of Construction

I object to this project because a number of health impacts resulting from this project are not satisfactorily addressed in the EIS.

- Sleep Disturbance; if heavy truck movement is permitted on a 24 hour basis, it will disrupt sleep patterns for many local residents. Poor sleep is associated with a raft of health impacts, including increased blood pressure, increased cholesterol levels, impaired work performance, increased anxiety & depression, and relationship stress and breakdown. **There needs to be a truck operation and movement curfew between 9pm and & 7 am, along with noise mitigation described above**

- Respiratory Irritation due dust: Spoil removal from tunnelling will increase dust locally and this will impact on general respiratory health, particularly for young infants and children and those with pre-existing heart & lung conditions. **There needs to be appropriate glazing and air filtration mitigation as proposed above. Trucks must be fully covered and all trucks should washed, on the body of the truck and around the wheel**

bay & tyres, before entering road ways and distributing silica based dust. In addition round the clock monitoring of local air quality is required and residents should be alerted if dust levels are raised at certain times.

- Mourning & Grief over loss over home & community: This will be an enduring influence on many people, including those forcibly moved and those that remain. It will also increase the risk of both anxiety and depressive conditions. The loss of home and community attacks a basic need for all humans, to have stable shelter and accommodation. Many people believed that a home within the confines of the Heritage Conservation area would safe-guard them from such destruction and vandalisation of their community as proposed by the M4 East project. **The lack of any proposed mitigation for this major impact is a serious deficiency in the EIS. It requires appropriate address and resolution. There should not be any progress on the project until this matter is satisfactorily addressed and appropriate restitution made to affected residents**

- Anxiety about impact on homes: The ongoing work, associated, with blasting, tunnelling and spoil removal will leave many remaining residents anxious about the security of their own homes, probable financial loss and reduced ability to care for themselves and their families' future

- Impact on Family life: The loss of close family and friends from an immediate neighbourhood diminishes the quality of life for many people. Increased isolation, particularly those who were in their own or rented flats will be associated with increased health morbidity. **It is most likely that the initiation of the project will hasten the death of many elderly residents if they are displaced from their long-standing homes and community. The lack of a clear and compassionate plan to deal with these major problems is a serious deficiency of the EIS.**

If the project proceeds a health monitoring study must start now and monitor the health and well-being of all local residents who remain and those displaced to ensure that health impacts are kept under close scrutiny. In particular the impacts on children need to be carefully monitored, particularly impairments on school education performance.

4 Post Construction Impacts

I object that even when the M4 East is completed, the traffic congestion impacts in the Haberfield/Ashfield localities will not have improved.

Once the project is completed in 2019, the Haberfield/Ashfield sector will remain significantly impacted as the increased induced traffic will funnel into 2 already crowded corridors, namely Parramatta Rd and Dobroyd Parade. Proposed new right hand turns at Ramsay Street & and Waratah St off Wattle Street will increase through traffic in what is a residential suburb. The EIS also notes in its cumulative impact section (26), that there would be greater traffic densities along both the Eastern sector of Parramatta Rd and Wattle St when the whole project is complete. This appears to contradict other assertions about the localised benefits. It also states in Section 26.4.2 that there would be significant increases in concentrations of pollutants in a

select number of sites, but does not specify where. **Detailed information is required about where the pollution impacts are predicted to be worse as consequence of this project and identification of what remedies or solutions are proposed. The project should not be approved to proceed until these matters are satisfactorily addressed.**

5 Unanswered Questions

I object to the current proposal because the EIS fails to satisfactorily address a number of significant concerns about ongoing health impacts:

- **Localised noise hot spots:** The redistribution of traffic and focussed portal entry & exits will cause concentrations of noise. In addition ventilation fans and exhaust stacks will create new noise sources that will require monitoring. Ambient noise will combine and effect the Haberfield / Ashfield interchange and Concord interchange zones. **This information should be clearly spelled and readily identified and appropriate mitigation planned.**

- **Ongoing sleep disturbance:** The localised hot spots will contribute to ongoing sleep disturbance with health impacts that are known and documented.

- **Localised Pollution hotspots:** The Portal entry and exits will create localised pollution hot-spots. In addition until the project is complete, as described above there will be ongoing increased traffic in Parramatta road east of Bland Street, which will cause local problems. **Again detailed information of these impacts is required along with mitigation proposals.**

- The EIS does not provide data on PM2.5 pollution in localised areas, except from 24 hour averaged data. The WestConnex website provides data from June-August 2015 on 5 sites, but again only provides PM data on a 24 hour averaging basis. Peak levels during the morning and afternoon travel peaks on an hourly exposure basis are not made available. **The hour average data of PM2.5 exposure is required because this is when children and parents are often walking to school.**

- **Exhaust stack plume dispersal:** If we accept the assertion in the EIS that the exhaust ventilation tunnel will for the most part allow for reasonable distribution of pollutants away from the immediate vicinity, several issues of concern remain.

- **The first is what is the impact of intense localised plume strikes onto small areas, which will cause often short, but quite intense concentrations of pollutants in a restricted area, due to changes in wind patterns or atmospheric inversion layers?** These acute events can be a major trigger for acute asthma episodes or people with other chronic lung conditions.

- A second and related issue is that plume strikes will more frequently hit high rise buildings, so projected high rise apartments along the Parramatta Rd corridor, especially at Kings Bay, Burwood and Homebush, will be more likely to be affected than low rise housing. **What will be done to mitigate exposure to residents in the proposed high rise buildings under the Urban growth plans?**

- The third issue is, **do these pollutant plumes continue to contribute to the adverse air quality conditions in the SW of Sydney?** So is the claim of an improved local air quality in in the inner west, done at the expense of a worsening of the air quality in the South West, due to the prevailing air movements?

- The EIS does not consider the impact of traffic growth along the Parramatta Road corridor following the proposed developments proposed by Urban growth for the corridor. How will air quality improve if traffic volumes build up due to increased population densities proposed for the corridor?

- **In Tunnel exposure to pollutants.** The EIS identifies the pollutant exposure for the Concord-Haberfield journey. However, there does not appear any recognition of cumulative exposure for people such as transport and taxi drivers, once all proposed tunnel projects are complete. If a person takes a return trip from Hornsby to the airport via NorthConnex & WestConnex, over half the journey by 2023 will be in a tunnel. So there would be some 40 or more minutes spent driving in a tunnel on a return trip. What will be the cumulative in-tunnel exposure from such a lengthy trip? Or if a taxi driver does this trip three times in a day, the exposure may even be longer; say a minimum of 120 minutes of in tunnel ambient exposure. **How would the cumulative impact accrue in terms of NO2 or CO exposure. Would there need to be advisory information to limit in-tunnel exposure to less than 60 minutes per day?**

- **The lack of analysis about particulate matter pollution.** The EIS raises a number of contradictory issues about PM monitoring. The EIS argues that the NSW approved methods has no requirement to measure PM2.5. In fact much of the analysis is done on standards promulgated in 1998, and probably on science that is over 30 years old! There have been huge advances in knowledge and measurement technologies, that this raised questions about claims that this project is being based on world's best practice. The air quality standards proposed in the EIS do not appear to match the proposed levels contained in the revised National Environment Protection (Ambient Air Quality) Measure, which would be equal to world's best practice (eg a 24 hour exposure to PM2.5 of 20 microgram/m3 instead of 25 microgram/m3). **The EIS should apply the proposed levels which are to be implemented across the country later this year, rather than the current out dated levels used in the EIS.**

- **How were vehicle exhaust predictions calculated?** Did the EIS calculate motor vehicle exhaust emission in tunnel based on the proposed mix of vehicles and the type of emission under varying operating conditions as supplied by vehicle manufacturers? **Were any of the calculations based on what we know to be false and misleading data from companies such as VW?**

- **We know that there is no safe limit to most exhaust emission exposure.** They contribute to both increased rates of cardio-vascular disease and lung conditions, including lung cancer, which is now increasing amongst non-smokers.

- **Diesel exhaust emissions are carcinogenic.** Modern Diesel exhaust consists mostly of particles sized PM0.5 and smaller (i.e less than 0.5 micrometer, at least one fifth smaller than PM2.5). There is no measurement of the quantity of these particles which drivers will be exposed to in tunnels. These particles penetrate into the blood stream and long term effects are not well known. **It is not acceptable to state that the technology to measure**

these PM emissions is difficult and not required by NSW approved methods (section 9.2.4). The public needs to know what they will be exposed to in tunnel and via the tunnel exhaust vents. There are mitigating technologies that reduce in-tunnel and from tunnel exhaust ventilation stacks, by the use of electronic precipitators, which if designed from the start would work satisfactorily, as they do in Madrid and Hong Kong. Also carbon filtration can reduce Nitrous oxide build-up both in tunnel and from exhaust.

- **Diesel vehicles may need to be banned from the tunnels and also from our urban environments.**

IN SUMMARY

The EIS clearly outlines the enduring and destructive impact that the WestConnex project will have on the lives of people in select communities of the inner west. The loss of heritage items will be irreplaceable. The social connections and networks of families and friends will be disrupted. No meaningful mitigation is proposed. The central argument of the project proponents is that the perceived benefits will make Sydney a better place to live and work, so presumably, although it is not stated explicitly, the enforced sacrifices on several hundred thousand residents of the inner west justifies this outcome. The proponents do not give any real evidence to support their thesis and to date no business case, with all the socio-economic costs and benefits, has been made available. In fact it would appear that the proponents are pushing ahead with the project in spite of clear external critiques and with no logical rebuttal to the critics.

The so-called social impact analysis in the EIS is markedly deficient and requires to be re-done if it is t meet the requirements of the SEARS and what the community would expect.

The project has already had an impact on the health and wellbeing of local citizens. During construction further impacts are proposed, that if unmodified will have serious impact on local wellbeing, particularly the 24 hour heavy vehicle traffic and tunnelling work. Even when the M4 east is completed, local pollution and noise hot-spots will remain; East of Bland St and along City West link will be as congested as ever, with increased the capacity coming to a stuttering halt at those 2 choke points. Improved public transport plans for Parramatta road corridor are not even planned to be operational until 2031.

As outlined there remain too many unanswered questions about the health impacts. From a health and welfare perspective, this is a slow moving disaster for local affected communities. The disaster is easily avoidable and should be avoided by not proceeding headlong with this project. It is the wrong project at the wrong time for Sydney. Let us stand back, take a deep breath and work collaboratively, using proper planning principles, to design twenty-first century transport solutions for our communities and metropolis.

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A People's M4 EIS

Submission by Sharon Laura of Haberfield

31/10/201531/10/2015 wendybaconblog Commentaries & Objections AECOM, Ashfield, Bland Street, diesel trucks, Dobroyd Parade, Dobroyd Public School, EIS Consultation Period, Haberfield, Haberfield Heritage, Haberfield Public School, Haberfield Westconnex Action Group, noise, Parramatta Rd., Reg Coady Reserve, Social Impact Assessment, vibration

Few people know more about the impact of Westconnex than Haberfield resident Sharon Laura. Her home in Haberfield would be surrounded by massive construction sites should the M4 East be allowed to go ahead. Drawing on her long experience with social and health issues, Sharon has met, talked and provided support to hundreds of residents along the project route, including tenants and owners who are deeply distressed at having their homes taken off them with such short notice to leave. She is a spokesperson for the Haberfield Westconnex Action Group and has attended lots of EIS and information sessions where she has tried to get answers to her many questions. This is just part of her submission. Sub headings and some emphases have been added by People's EIS editor

(https://m4eis.files.wordpress.com/2015/10/12027510_1649793781934542_7040865712927164799_n.jpg)

Sharon Laura (sitting) at Stop Westconnex protest with neighbours. September, 2015

I write to submit in relation to the Environmental Impact Statement for the WestConnex M4 East project. I am opposed to both the M4 East project and all other proposed stages of WestConnex. I request a response to my concerns outlined in this submission. (20151030 SL Final Part A)

I am a resident of Haberfield, and live in community that is going to be greatly and adversely impacted by this project. My home is located within a residential Heritage Conservation Area. If this project goes ahead then I will be living inside a massive construction zone for a minimum of three years.

During the construction period, there will be severe impacts on my home, life and community during the building of a large tunnel ventilation and associated facilities site; two interchanges, and four separate civic construction areas. (These separate and distinct construction sites are the Wattle St road surface construction site, the Dobroyd Parade/Reg Coady road surface construction site, the Northcote St road surface construction site, and the Parramatta Rd road surface construction site.)

At the end of any construction, my home will be left standing 150 metres from the Parramatta Rd, Ashfield/Haberfield interchange; 300 metres from the Stage 1 and Sage 3 tunnel ventilation and associated tunnels operating site on Walker Avenue, Haberfield; and 600 metres from the City West Link, Haberfield interchange.

On a deeply personal level I object to all this disruption and loss for no good purpose or end result.

Westconnex won't meet stated aims or objectives

Overall, I object because:

WestConnex as proposed is not going to meet its stated aim of being the best transport solution for Sydney and is not going to solve our transport problems.

There has been no proper consideration of improved and integrated public transport as an alternative to WestConnex.

The EIS refers to the M4East providing a connection between the Blue Mountains and Sydney, yet there is no evidence there has been any information provided, or consultation with the residents or Council about the M4 East project and it's supposed need or benefit to those living or working in the Mountains.

The traffic modelling presented in the EIS does not add up, and the EIS figures show no long term or permanent improvements.

No business case for the project has been publicly released.

The planning process is ad hoc, corrupted and lacks transparency.

Contracts have been signed, approval assumed and work commenced prior to planning approval and any proper community engagement.

Failure in community consultation

There has been inadequate and conflicting information provided at EIS community sessions.

WestConnex community consultations have been lacking in real engagement and have been nothing but sham PR exercise.

I also strongly object to the project because the EIS display period and time for the public to submit has been too short and has significantly impacted on the community's ability to formulate a complete and detailed response to many concerns arising from the proposed M4 East project.

I object to statements by the proponents and supporters of the project that the community should 'trust' project development and planning process for the M4 East and support the project because it is in the 'best interests of the majority of the people'; and that necessarily 'some people will be inconvenienced or suffer some impacts.'

I object to the planning and development of the M4East proposal that has been seriously compromised by the involvement of AECOM in so many aspects of the project.

Construction site trucks to exit onto Bland Street

I object to the location of a construction site traffic exiting directly onto Bland St, Ashfield.

The Parramatta Rd interchange construction site vehicle exit onto Bland St, Ashfield will cause considerable and unacceptable noise, vibration pollution and traffic congestion in this location. Many people who live work and travel near the Bland St and Parramatta Rd intersection at Ashfield/Haberfield will be adversely impacted. I object to this loss of amenity.

The location of the Bland St construction site is on narrow road, very close to intersection lights. This construction exit will enter directly onto a traffic lane travelling in a north and south direction. Within a few metres past the proposed exit site, the north travelling lane expands into 2 lanes immediately before traffic lights. This is to enable north travelling traffic to turn right or left onto Parramatta Rd, or to travel straight across the intersection to immediately merge into 1 lane onto Bland St Haberfield. Also, construction vehicles entering Bland St, Ashfield and turning left onto Parramatta Rd to travel in a westerly direction will occupy the two turning lanes before the intersection.

The construction site exit will increase congestion along Bland St, Ashfield and Haberfield – a significant north/south and connecting road. It will be a very tight turn for construction vehicles turning left onto Parramatta Rd from Bland St.

Further, what is to stop construction vehicles turning right into Parramatta Rd, or even travelling straight ahead on Bland St, Haberfield as they try to avoid the inevitable traffic congestion in the area, or as they use this route as a de-facto 'marshalling' strategy as they await their turn and space to load up spoil, or to deliver goods and equipment in and out of the civil construction site. I object to this likelihood occurring during the construction period.

I object to the dangers likely to be caused by construction site traffic exiting onto Bland St, Ashfield to all road users and pedestrians passing through the Parramatta Rd intersection, and not only because of danger to school children and carers travelling to and from school.

Increase in Noise

I object to the increase of noise to be caused around the four construction sites in Haberfield and Ashfield. This cumulative increase of noise in our neighbourhood will cause a significant loss of amenity for all. In particular I object to the increased noise caused by construction vehicles exiting direct onto Bland St, Ashfield.

These construction vehicles will be heavily laden and will require revving in order to power up the incline towards the Parramatta Rd intersection. This will cause noise disturbance to all who live and work around the intersection. Because of the way noise travels, (increasing in volume and spread as it moves upwards) construction truck noise fwill also impact upon residents in Bland St, Haberfield, as well as upon the Haberfield Public School community.

Hundreds of polluting diesel trucks a day

I also object to the increase in localised pollution around construction sites. In particular around the Parramatta Rd construction exit onto Bland St, Ashfield by large numbers of diesel vehicles heavily laden, revving up or idling and thus spewing out the most dangerous pollutants. Pollutants which will

sit and hang low around the natural gully which surrounds the Parramatta Rd and Bland St intersection, and pollutants that may not disperse quickly or at all, – depending on the local weather conditions and volume of trucks using this location.

(https://m4eis.files.wordpress.com/2015/10/haberfield-school-children.jpg)

Anti-Westconnex after school protest on pedestrian bridge across Parramatta Road, 2015

I object to the likelihood of local streets being used as 'marshalling areas' for trucks waiting to enter the construction site.

I object to the likelihood of local streets being used for parking by construction workers on the project.

Lack of detail in EIS

I object to the lack of detail in the EIS in relation to the planned mitigation to be offered to individual premises. (Noise, vibration, dust, smell, light and pollution.)

There is mention in the EIS of 300 homes to be offered various mitigation measures along the project route. (Volume 2E, page vi) But within the EIS I have found no details of the exact locations or premises to be offered such mitigation. And no WestConnex or CIMIC (Leightons) Joint Venture employee was willing to find out or share this information with me. I was repeatedly told that this information was private and confidential. I object to this lack of identification which is not for the benefit of the public.

In the EIS (Table 2.1 Indicative construction program overview, page 12, Vol 2E) three years of impacts has been given as likely for neighbourhoods surrounding the Wattle St interchange, the Parramatta Road interchange and the Eastern Ventilation facility (bordered by Walker Ave, Wattle St, Parramatta Rd and Allum St).

But I have found no specific mention of construction impacts on the neighbourhood around Parramatta Rd, between Northcote St and Wattle St, Haberfield. Only that this residential and commercial neighbourhood is identified as the 4th area to be impacted and is marked up as the C7 Northcote

Tunnel site (Figure 2.2 Overview of construction footprint and construction ancillary facilities, page 13, Volume 2E).

I object that the EIS does not identify, confirm or recommend specific mitigation for all the residents and businesses impacted by the four (4) construction zones in Haberfield and Ashfield around the:

- Parramatta Rd, Ashfield/Haberfield interchange site (on road surface and tunnel construction areas);
- City Link/ Dobroyd Parade, Haberfield interchange site (on road surface and tunnel construction areas,);
- Wattle St and Walker Avenue (on road and tunnel construction areas);
- Northcote St and Parramatta Rd construction site (on road surface and tunnel construction areas).

There is reference in the EIS re noise and vibration impacts (page 85, Section 6.5.1, Volume 2E) that the Noise and Vibration Assessment has found that 'much of the project area is already exposed to high noise levels from existing traffic with many properties already exceeding noise limits. As a result, the Noise and Vibration Impact Assessment has identified 310 properties that may be eligible for treatments to mitigate primarily existing noise impacts.'

I object that these 310 specific properties and locations have not been identified within the EIS to allow residents to know whether their homes or business are to be offered mitigation for noise and vibrations impacts.

I have also found reference regarding amenity impacts in the EIS (page 92, Section 7.4.1, Volume 2E) stating that: 'There are 310 instances where noticeable noise increases could be experienced, primarily as a result of adjacent properties which had previously acted as noise barriers to these properties or where new noise road sources or traffic volumes increase.'

I object that these 310 properties and locations have not been identified within the EIS to allow residents or businesses to know whether their premises are to be offered mitigation for noise impacts during construction, or after completion of the project, due to adjacent properties being demolished for the project.

Also with reference to human health, (page 93,Section 7.4.3, Volume 2E) in relation to pollution the EIS states that: '… for a number of areas where traffic on the surface roads is expected to increase as a result of the project a small increase in pollutant concentration may occur.' Also, within the same assessment it is noted that: '…where property treatments are required to mitigate traffic noise, these measures are to protect people from adverse health impacts where they spend most of the day (i.e. indoors). These treatments assume that residents take up these measures and where they do, they keep external windows and doors shut and have minimal use of outdoor areas.'

I object that the EIS does not identify the location and properties know to be affected by an increase in pollution due to the project, yet the EIS assumes mitigating treatment will be provided and taken up by residents. But without specific identification of the location where pollution will increase, residents or businesses will not know if their premises require or are to be offered mitigation for increased pollution.

I object to the lack of information, or consideration within the EIS of the likely cumulative health and social impacts upon people who not only live within the project area, but who may both work, live and study within that same or different project area. The health and social impacts upon these people will be significantly greater than on others who spend less time within the project area.

I object that within the EIS, there is no reference or table that clearly lists or documents the total number of residents likely to be impacted by the project that also includes a break down and identification of single or combined impacts.

Project boundary too narrowly defined

I object that the project boundary and areas identified as affected is only 50 metres. The impact of this major road project will go far wider than 50 metres of the indicative route. By restricting the footprint of the projects impact to just 50 meters along the indicative route, the true number of properties and people adversely impacted is hidden, and the true costs of mitigation avoided. I object that much of the mitigating costs of the impacts of this project are to be borne by individual residents or businesses and not by the proponents.

Loss of vegetation, open space and trees

I object to the loss of any vegetation along the project route. Given that the route will go through a highly urbanised environment, any loss of vegetation, on either private or public land, constitutes an unacceptable loss and degradation.

I object that **this loss is proposed for no good purpose, as WestConnex is not a solution to Sydney's transport problem, and traffic modelling suggests that congestion will remain a problem in many areas after construction of the M4 East project.**

I object to the loss of any vegetation planted as part of the rehabilitation/landscaping works following the construction of the M4 motorway. I have often been forced to travel on the M4 between the Sydney and the Blue Mountains. Over many years, I have watched side vegetation grow and provide visual relief, shade and refuge. I object to watching this vegetation being torn down, especially as once upon a time, the construction of the M4 motorway was then supposed to be the answer to Sydney's east/west transport problems. I object that this existing motorway vegetation is seen to have no real value within the EIS.

I object to the impact upon the habitat of birds and animals which live, forage and shelter amongst the vegetation and trees to be lost due to the construction or operational needs of the project.

I object to the fact that the project will result in the know **removal of about 15.7 hectares of vegetation, comprising 12.9 hectares of planted trees and screening vegetation (mainly from alongside the M4) and about 2.8 hectares of grassland with scattered trees (such as from Cintra Park and Reg Coady Reserve).**

I object to the loss of open space available for passive recreation and enjoyment and loss of trees from the Reg Coady reserve. There is too little green space available for passive enjoyment these days. Any loss is an unacceptable loss. As our urban environment is built up and becomes more densely populated, there is an increasing need for green space available for passive enjoyment, not less.

I object to the loss of the 'scattered trees' within the Reg Coady reserve. Some of which are magnificent specimens and the home and staging posts for local birds. I object to the loss of cool, shade and shelter due canopy loss with the removal of trees in the reserve.

(https://m4eis.files.wordpress.com/2015/10/img_5731.jpeg)

Tree in Reg Coady Reserve would be destroyed if M4 East goes ahead

I object to public land (Council or State Government) being taken solely for the purpose of building a toll motorway that is not a solution to Sydney's transport problems. **I object to public land being seized to build a road that will force Sydneysiders into greater car dependency, induce more traffic into our city, and inevitably increase road congestion throughout all of Sydney**.

I object to the loss and threat to the Grey-headed Flying-fox, a vulnerable fauna species listed under the TSC Act and the EPBBC Act. The Grey-headed Flying Fox has been recorded with the project footprint.

I also object to the threat caused by the M4 East project to the threatened microbat species, such as the Eastern Bentwing Bat and the Large-footed Myots. These are species that roost under bridges and culverts. Roosting bats, if present would be disrupted by construction activities. There is no suitable breeding habitat for these species within the construction footprint or adjoining areas. The project would also remove areas of foraging habitat (planted trees along roads and in parks) for the Eastern Bentwing Bat.

I object that the EIS recommends that a 'formal biodiversity offset is not considered necessary to compensate' for 'minor and localised residual impacts' of the M4East project. I believe that a formal biodiversity offset would be required.

I object that EIS does not recommend referral of the M4East project to the Australian Government Department of the Environment for further assessment or approval under the EPBC Act. I believe that the M4 East project, in all proposed stages, and because of its cumulative impact should be referred to the Australian Government under the EPBC Act.

Inadequate Social Impacts Assessment should be redone

I object to the validity of the Social Impacts Assessment (SIA) because baseline information and much of the research material used was not collected independently. I object that much of the material and information used as a basis for the GHD SIA had been collected and supplied to the SIA team by WestConnex Delivery Authority. I object to this lack of independence of the SIA from the proponent of the project.

I object to the project because of poor and limited methodology used in the compilation of the SIA. How meaningful is the identification of the true and complete social impacts of the M4 East project on the Haberfield and Ashfield communities, – and what chance of redress and mitigation given such bias and limitation in the development of the SIA? **I believe that the SIA must be redone, in order for the full social impacts of the project to identified and addressed.**

I object that much of the SIA work was done in preparation for the concept plan when the 'baseline' work was completed and before the preferred route was announced.

I object that there was no SIA consultation with Ashfield Council after initial discussions around the concept plan phase, and not in direct relation to the preferred and indicative route released in 2015. I strongly object to this serious omission, as the route and the impacts of the M4East project changed significantly from those associated with the concept phase announced in 2013.

I object that after the community 'consultation' re the 2013 concept plan there was no direct engagement with residents in the development of the SIA for the EIS of the preferred route released in 2015.

I object that only residents whose homes were notified of acquisition in 2013 and 2015 were considered 'consulted' in relation to the SIA for the EIS.

I object to how little knowledge or information about Haberfield and Ashfield Social Infrastructure Providers (SIPs) is revealed or referred to in the SIA of the EIS.

I object that Dobroyd Public School, St Joan of Arc Primary School, Ella Community centre and outreach programs, the Ella residential care facility, Ella childcare, and another child care centre in Ramsay St, Haberfield were omitted from direct consultation in the development the SIA.

I object that these important local services were not consulted in relation to the SIA, because they were considered outside the area affected by the route and project area.

I object that only SIPs located directly along the route and very close to it were regarded as within the project area to be considered for the SIA. I object that many other social infrastructure providers from Homebush to Haberfield must also have been excluded for consideration and consultation in preparation of the M4East EIS. I object because it is most likely that there will be many other aged, child and community centres and services that will have been overlooked in the EIS.

Important social impact neglected because considered outside the project

I object to the lack of consideration of by the SIA of the considerable impact on residents, schools and community caused by local street changes required due to a new right hand turn into Waratah St,

Haberfield. I understand that these impacts were omitted from the SIA, because they were seen as being outside the project area required to be considered by the SIA.

I object to the complete omission within the SIA and consideration of resulting social impacts from proposed traffic changes and restrictions at the intersection of City West Link with Timbrell Avenue and Mortley Avenue, Haberfield. I understand that these impacts were omitted from the SIA, because they were seen as being outside the project area required to be considered by the SIA.

I object to the lack of attention by the SIA of the impacts on residents in Ashfield & Haberfield cause by trucks exiting into Bland St, Ashfield, from a construction site in the middle of a densely populated area.

I object to the SIA of the EIS (http://m4eis.org/2015/10/04/summary-of-m4eis-social-and-economic-impact-reports/) because it is a poor and inadequate report](, insulting to all of us who live in Haberfield and Ashfield.

Failure to consult with businesses

I object that only 'consultation' undertaken for the Economics Impact Assessment with commercial property owners and business operators along Parramatta Rd, was after the concept design was released, and then only in relation to acquisitions proposed on the Haberfield side of Parramatta Rd, between Alt St and Rogers Avenue.

I object that some businesses on the Haberfield side of Parramatta Rd were initially being pressured to negotiate and settle on a 'voluntary' acquisition price before any planning approval for the project. I object that other businesses to be left standing were desperately seeking and not receiving information and support from WDA and RMS after the concept route was released.

I object that there are businesses along Parramatta Rd, Haberfield that have been left in limbo land for the past 2 years, and are unlikely to receive adequate compensation for business losses that occurred during the post concept and preferred route phase.

I object to current acquisition of property and the loss of businesses on the Ashfield side of Parramatta Rd.

I object that businesses, remaining in situ on Parramatta Rd that have already suffered considerable disruption and business loss, believe they will continue to lose more money and business in the next phases of the M4 East project.

I object to the lack of any real consultation between WDA/JV consortia and businesses in Haberfield and along Parramatta Rd (Haberfield and Ashfield).

I object because the WDA/JV 'teams' have no real knowledge or understanding of the Haberfield village, businesses or community. Whilst there was some acknowledgment of the likely chaos and impacts to be caused by the M4East project, the only compensation or sympathy offered by the WDA/JV 'team members' was that all the workers would be buying their coffees and lunches in Haberfield during construction.

I object to the fact that the Economic Impact Assessment 'consultation' has only been around specific issues related to the acquisition of individual commercial premises and businesses

Insufficient time to respond

I object that that EIS response period has been truncated into a very short period. The document itself is not easy to digest and contains many internal contradictions. I object that we have inadequate time to highlight all its inadequacies. I look forward your response.

Thank you for your time and consideration. Sharon Laura

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A People's M4 EIS

Westconnex comes to Underwood Road Homebush – Aurelia's story

14/10/201525/10/2015 wendybaconblog Commentaries & Objections Aurelia Roper-Tyler, Forced acquisition, Homebush, Noise mitigation, Property valuations, Underwood Road, Westconnex counselling

By Wendy Bacon and Nicole Gooch

(*The People's EIS interviewed Aurelia Roper-Tyler on October 12. Aurelia's story is just one of thousands across the 33 kilometre Westconnex route. Her story adds some depth that is entirely missing from the EIS Social Impact study. Indeed the GHD consultants who did the social impact study (http://m4eis.org/2015/10/04/summary-of-m4eis-social-and-economic-impact-reports/) did not interview affected residents for their report. You can draw on individual stories for your submission or tell your own story. The People's M4 EIS welcomes contributions.*)

Aurelia lives in Underwood Road, Homebush. Underwood Rd is the site of the proposed tunnel entrance and ventilation stack for the Westconnex. If the project is approved, houses would be demolished and residents left behind would experience increased traffic, pollution and noise impacts above safe levels. Lots of the vegetation that softens their urban environment would be stripped away.

The first Aurelia ever heard about the Westconnex M4 East tunnel was when her father-in-law rang her in December 2013 after he saw it on the evening TV news.

The next thing she knew a local paper was on her doorstep asking her if the house was going to be knocked down. Aurelia soon realised that her home was frighteningly close to the tunnel entrance.

She rang Strathfield Council who in turn suggested she ring the Westconnex Delivery Authority (WDA). They told her that her home may or may not be acquired and directed her to the WDA's website. Aurelia says it had "pretty pictures but we really didn't get much information from it".

The WDA then went into "damage control" and assigned the family a "liaison officer", who appeared to know very little, and who later left with no hand-over to the next person. Earlier this year, WDA declined to meet with the family at all. Finally in July, Aurelia received a letter confirming that the house would be acquired.

The family's roots go back in Homebush for decades. Her husband's family moved into the area in 1973 and can remember the stressful, noisy and disruptive construction of the M4 that cut a swathe through their community.

Aurelia and her husband moved into the Californian bungalow with its big backyard a decade ago just before their twin boys were born. One reason for the move was so that they could be nearer family. They decided they would like to stay and poured their life-savings into renovating their home. It had been barely a month since the end of the renovations when news of the Westconnex broke.

(https://m4eis.files.wordpress.com/2015/10/our-home.jpg)

The Roper-Tyler home in Underwood Rd

At that stage, the boys were attending their local Catholic school just a short distance down the street. When they first heard of the Westconnex, the family was distressed – they had not desire to move or for the property to be acquired. Aurelia begun attending information sessions on the Westconnex and says that, "after looking at the detailed maps, it hit me that we need to get out of here".

“I realized there was going to be a ventilation stack right behind our house, (in the latest plans it has now changed to be in the front) and the entrance to the tunnel was going to be a hundred metres from our front door.”

“I am a huge believer in global warming, and pollution, and I thought, we can’t live here. They gave us a timeline of construction (several years), and I realised there were going to be lots and lots of issues with the constructions that were happening here. So I felt we needed to move.”

By then the neighbours had received acquisition letters, but she hadn’t. Her home would be left, the last house standing, next to a laneway. “We were going to be this little house left on its own, with a three lane tunnel entrance on the other side. It was a really, really, difficult situation, because we were wanting to sell, but we couldn’t as nobody would buy.”

Like many others left in the dark by the WDA, Aurelia and her family then went through a long period of anxiety and depression from stress not knowing what was going to happen. Aurelia felt she was “in limbo land”, which was made worse by the fact that WDA didn’t seem to know either what was happening.

Finally, half way through this year the chosen route was made public and Westconnex told her they would acquire her house. She’s happy now that a decision has been made and they no longer have to deal with constant uncertainty, but the thought of loosing their home and suburb still fills her with grief. The disruption to an “already busy family life” was also difficult.

“We are already busy with schooling, family and our own careers, and then you have this additional, absolutely unforeseen pressure, and it is huge.”

Westconnex originally offered $400,000 less than their own valuation for the house. Aurelia and her husband stood their ground but worry that many wouldn’t have the capacity to do the same. She knows some who were panicked by the whole situation and just took anything they were offered. She worries about what happens to the more vulnerable.

The family will soon move to an apartment nearer the CBD. The boys were awarded a scholarship to attend St Mary’s Cathedral School in the city. Aurelia will however have to travel much further to her work in Concord.

One of her frustrations is that many people want to believe Westconnex’s line that the tollway will solve local traffic congestion. (Even the Westconnex EIS doesn’t pretend that this would occur so they are going to disappointed).

Aurelia describes her neighbourhood as having very strong ties. The children all ride their bikes up and down the streets and people look after each other. Aurelia and another friend take it in turns checking in everyday on, their 96-year-old neighbour, but now everyone in the street is leaving except him, and he is very stressed about that. “It’s killing our neighbour, he has already had three falls because he is so worried about it. Everyday he comes around to our house to ask when are we leaving.”

(https://m4eis.files.wordpress.com/2015/10/richard.jpg)

Aurelia's 96 year old neighbour Richard reading EcoTransit Sydney newspaper

Overall, Aurelia, who works as a social worker in the mental health field, found WDA to be "unhelpful". She is dismissive of the free counselling offered by the WDA to help deal with the loss of their house.
"Free counseling from a person that is actually causing you grief. It's ironic. You're the perpetrator, I'm the victim, you are giving me free counseling so I can deal with your behavior. I think it's ridiculous."

Her husband Jeremy's grandmother lived in Short St in Homebush, 40 years ago when the M4 came through. It cut her off from the rest of the family on the other side of the road. Before that, she could walk across Short St. to the Church, the pharmacy, the shopping centre and her family. Back then the neighbourhood had the qualities of what planners today call 'liveability'.

Then Short St got cut off and she had to make her way all around across around the motorway until she couldn't anymore when she was in her 80s.

"20 years later we are doing exactly the same thing, with promises of a wonderful new road."

There are hundreds of residents living in the Underwood Rd area of Homebush. The project has not yet been approved but if it is, those left behind are going to experience a dramatic deterioration in their living conditions. There will be 24 hours tunnelling for several years during which trucks will remove thousands of truckloads of spoil. A small park and its picnic tables were removed months ago, long before the EIS was even lodged. When the tunnel is open, the noise will still be above acceptable limits for some of those occupying buildings called 'sensitive receivers'. Some will receive noise treatment (this depends on a range of factors including cost; final decisions are not made until construction is well underway). The EIS does not recommend noise mitigation for residents living above the first floor in apartments. The local Catholic Church Our Lady of the Assumption (https://sites.google.com/a/syd.catholic.edu.au/olanorthstrathfield/our-parish) will experience 'high' impacts.

(https://m4eis.files.wordpress.com/2015/10/homebush-ventilation-stack-img_3001.jpg)
Site of proposed ventilation stack

Aurelia told us that while she objects to the way WDA has gone about the destruction of her community, she might have been prepared to accept some damage if the overall project was worthwhile. But having examined more closely the Westconnex claim that it will vastly improve the situation for those affected by paralysing traffic congestion in Sydney, she found the evidence did not stack up. She then became a key campaigner (https://www.facebook.com/NoWestconnex/posts/510459599096453) for her local area. For that and many other reasons. she will be putting in a submission **objecting** to the M4EIS proposal.

(https://m4eis.files.wordpress.com/2015/10/underwood-road.jpg)

The People's EIS will be publishing more individual stories soon. Here's a submission from Haberfield written by an anonymous resident (http://m4eis.org/2015/10/06/a-response-to-westconnex-m4-east-proposal-an-objection-from-a-haberfield-resident/).

3 thoughts on "**Westconnex comes to Underwood Road Homebush – Aurelia's story**"

1. **aurelia** says:
   14/10/2015 at 5:05 pm Edit

   Thanks for giving me a voice Wendy & Nicole…..Cheers and hope people read it.

   Reply (http://m4eis.org/2015/10/14/westconnex-comes-to-underwood-road-homebush-aurelias-story/?replytocom=113#respond)
2. **wendybaconblog** says:
   14/10/2015 at 7:50 pm Edit

   Thanks for sharing your story Aurelia. As you would know often people can relate more easily to a simple account of how an individual will be affected than hundreds of page of date that describe buildings affected by noise as 'sensitive receivers'. There is nothing wrong with that term but it does tend to neutralise the impact.

   Reply (http://m4eis.org/2015/10/14/westconnex-comes-to-underwood-road-homebush-aurelias-story/?replytocom=115#respond)
3. **Sharon Laura** says:
   21/10/2015 at 7:01 am Edit

   Aurelia, thanks for the courage in going public. I hope that your story, giving 'voice and life' to a person whose home is being acquired by WestConnex will give courage to others in a similar situation.

I hope those who are currently in the process of trying to negotiate just terms for the loss of their homes are not panicked into accepting what is first on offer by WestConnex/RMS. That they negotiate hard like Aurelia to get the best deal – and not leave their current home until they have found a suitable replacement for the home and community they are losing.

In Haberfield and Ashfield, there are owners and tenants, who have received their PANs (notice to settle on agreed price, either as an owner or tenant), and who are being hassled to leave their homes before Christmas. Many have no idea of where they will re-locate. Some, who may have been offered a 'good price', say that even with this, they cannot afford to purchase or rent back in Haberfield or Ashfield. So much for 'just compensation' and a just process of acquisition. Money provides no 'just compensation', when a person or family is forced out of their community against their will, and in an such and untimely manner. Why should anyone leave until they are ready and have got something decent to move into?

It is important that residents share their stories, and don't try to negotiate in silence and alone. Thanks again Aurelia for speaking up.

Reply (http://m4eis.org/2015/10/14/westconnex-comes-to-underwood-road-homebush-aurelias-story/?replytocom=159#respond)

Blog at WordPress.com (https://wordpress.com/?ref=footer_blog). The Big Brother Theme (https://wordpress.com/themes/big-brother/).

A People's M4 EIS

This is the story of Kevin – one of many older residents hit hard by Westconnex

28/10/201528/10/2015 wendybaconblog Commentaries & Objections GHD, Haberfield, Kevin's story, Older residents, property acquisition
By Wendy Bacon and Nicole Gooch

This is the second in our series that feature individual stories. This post tells the story of Kevin and Ann, two residents of Homebush who are in their eighties.

The People's EIS has already published Aurelia's story from Homebush (http://m4eis.org/2015/10/14/westconnex-comes-to-underwood-road-homebush-aurelias-story/). We interviewed Aurelia because she could speak directly about the experience of having her home compulsorily acquired by WestConnex. But she is also a social worker and is concerned about the stress and social disruption caused by the WestConnex project even before it is approved.

It's not just the people who are forced out who are affected by WestConnex. Aurelia told us about Richard her 96-year-old neighbour in Homebush whose house has not been purchased. She and her neighbour keep in touch with him regularly. Everyone is leaving except him: "It's killing our neighbour, he has already had three falls because he is so worried about it. Everyday he comes around to our house to ask when are we leaving."

WestConnex was required to include a social impact study in the EIS. This is Appendix (http://m4eis.org/2015/09/17/m4-east-eis-volume-2e-app-m-part-1-social-impact-2/) M. The NSW Planning Department required that this section of the EIS should report on the impact of the M4 East on communities from planning through to operation of the WestConnex. GHD was hired to work alongside AECOM to produce the social impact study. According to its website, GHD is a global services company that operates in the "markets of water, energy and resources, environment, property and buildings, and transportation." It provides, "engineering, architecture, environmental and construction services to private and public sector clients." It is not a specialist in social impact studies.

People's EIS caught up with GHD consultant Anne Mithieux at a Strathfield EIS exhibition session in September. She explained to us that GHD did not interview any people whose houses were being acquired directly which probably explains why her impact study contained

very little detail and described the stress and disruption that is already occurring along the M4 route as if it was a future event. She saw her task as recommending mitigation for the impacts of a project that was going to happen. (This is the sort of attitude that is fueling critics' apprehension that the Planning process is a set up.) She was not uncaring but is not very familiar with the area she was studying. She seemed a little surprised about the intensity of the impacts that were already happening.

Two weeks ago, the ABC interviewed Arthur Alibrandi (http://www.abc.net.au/news/2015-10-18/residents-rally-against-home-acquisitions-for-westconnex-project/6864268) who told the ABC News that his 82-year-old father, Joe who has lived in his unit for nearly 50 years, had been offered an amount by WestConnex that would make it "physically impossible" for his elderly father to stay in the area.

In response, Premier Baird told the ABC, "At times, there has to be a provision for the majority, there are difficulties for some people as part of that… We're doing everything we can in terms of compensation, looking after them, provide provision for a new home."

This statement reveals a similar detachment and apparent lack of knowledge on the part of the Premier. According to the SMH, Slater and Gordon Lawyers, who are representing about 70 property owners affected by WestConnex compulsory acquisitions have found that offers are 20-50 per cent below what clients' properties are worth. This means that residents quite unexpectedly are not only losing their homes but feel they have lost control over where they can live altogether.

Since we published Aurelia's story, Aurelia and the People's EIS have begun to hear stories of more people who are being forced out of their homes.

Kevin : another story from Underwood Road

Kevin and Ann (not their real names) are both in their eighties. Five years ago, they moved to Homebush, a community along the M4 route that will be hit hard by the WestConnex.

Initially, Kevin wasn't bothered by the WestConnex because according to earlier plans, it would have bypassed his home. But in June this year, he was told WestConnex would compulsorily acquire his home and he and Ann must move out by April. As anyone who lives in Sydney would know, nine months is not nearly enough time to unexpectedly sell and find another home.

When Kevin and Ann moved into their home five years ago, they expected to stay there for the rest of their lives. They had specifically chosen the house because it had no stairs, was walking distance to the train station and shops, and in a quiet street.
When interviewed for the People's EIS this week, Kevin said,

"I am very unhappy about the WestConnex. I can't find anywhere to replace my house. I am very old, in my 80s, so I thought the place where we are living at the moment, is our home. But I can't find anything to replace the house that is near the station and the grocery shops. There

were a few houses on the market, but they are too expensive. There is no way to get one of those houses, with the money I get from our house."

"They're going to acquisition it, they're going to buy it by force."

The situation is "very stressful. Particularly for aged people like me." He describes the search for a replacement as a "nightmare" that may have "shortened my life expectancy".

He laughed when asked if WestConnex had been helpful. "No. Just one way instructions."

"WestConnex is not helping to find a new house. It did a valuation and that's it. The amount from WestConnex may be fair, but I can't find anything to replace the house with the money from WestConnex."

(https://m4eis.files.wordpress.com/2015/10/img_3543.jpg)

96 year old resident Ray Harrison lives close to what could become a massive construction site for the tunnel exit and ventilation stack. He has been regularly protesting on the streets of Haberfield

WestConnex GHD report warns of serious risks to residents, especially vulnerable ones

The GHD report did find that the acquisition process could carry 'significant social risks' (Appendix M, p. 96)… including 'inaccessibility of equivalent housing at a comparable cost… relocation health risks…[and] altered access to social infrastructure' as well as potential housing stress due to higher rent or house costs. It is 'expected that the majority of owner-occupiers would aim to relocate within the local area', and effects may be compounded by the timeframe of just 9 months for some households to be relocated, market volatility and reduced housing stock available to relocate into (Appendix M, p. 68).

It also noted that the "stress and anxiety" could lead to "impacts on health, well-being and quality of life, which have been worsened by the uncertainty and the changing footprint of the project with some dwellings originally to be acquired now not, and some originally not impacted now required for the project (Appendix M, p. 68)."

It found that the impacts would likely impact vulnerable households but that even less vulnerable households would be affected as "land acquisition would increase property demand in the local area with some households with only nine months to identify alternate properties". (Actually it is less than nine months for Kevin as some property owners have been told they must be out of their houses by April next year.)

"Overall it is anticipated that the social impacts of relocating for many of the directly affected households would be **major short-term impacts**. In some cases, where households are unable to relocate locally, the social impact may involve an extended recovery time to re-establish social networks and daily routines for work, study and recreation. Alternatively, where households need to incur higher levels of debt in order to remain in the local area, increased mortgage or rental stress may result in greater and longer term social impacts."

Short term impacts are defined as between 1 and 3 years. (Appendix M p. 23). Major impacts are substantial ones that the report states could be mitigated, although it does not explain how this might happen after residents are forced out, which is in the process of happening at the moment. So for older people this could be very serious. The stress and forced relocation could shorten their lives, particularly for those who do not have strong family support networks.

Given the lack of any in depth or direct investigation by GHD, it is disturbing that the consultant repeats and appears to accept the word of WestConnex at face value. On page 87, GDA reports:

> WDA is also providing an independent service to vulnerable households (e.g. elderly, those suffering an illness) to help assist with their relocation. This service aims to provide assistance with tasks such as finding a new property (either to rent or purchase), arranging removalists, disconnection of services (electricity, gas etc.), attending appointments with solicitors and other tasks associated with relocating. With nine per cent of people in the region over the age of 70 years and 4.6 per cent
> needing assistance for their daily needs, this support will be imperative to mitigating relocation disruption.

On the basis of this statement, the report concludes that "minimising dislocation of affected households from their existing socio-economic networks is a key consideration in avoiding social risks to those affected by property acquisition."

GHD report out of touch with residents' experiences

While the WDA statement quoted in the GHD report does represent the official version of what is happening, it doesn't represent what residents would have told the consultant had they been asked. The problem is that with five months to go until they empty their homes and move to new houses, residents such as Kevin claim that support is simply not there.

WestConnex Action Group Haberfield spokesperson Sharon Laura told the People's EIS, "I hope those who are currently in the process of trying to negotiate just terms for the loss of their homes are not panicked into accepting what is first on offer by WestConnex/RMS." She recommended that residents negotiate hard like Aurelia (http://m4eis.org/2015/10/14/westconnex-comes-to-underwood-road-homebush-aurelias-story/) to get the best deal – and not leave their current home until they have found a suitable replacement for the home and community they are losing.

"In Haberfield and Ashfield, there are owners and tenants, who have received their PANs (notice to settle on agreed price, either as an owner or tenant), and who are being hassled to leave their homes before Christmas. Many have no idea of where they will re-locate. Some, who may have been offered a 'good price', say that even with this, they cannot afford to purchase or rent back in Haberfield or Ashfield. So much for 'just compensation' and a just process of acquisition. Money provides no 'just compensation', when a person or family is forced out of their community against their will, and in an such and untimely manner. Why should anyone leave until they are ready and have got something decent to move into?"

The WestConnex Action Group rejected Baird's assurances that the government is doing all it can to support people and called for a halt to forced acquisitions.

(https://m4eis.files.wordpress.com/2015/10/richard.jpg)

Aurelia's 96 year old neighbour Richard reading EcoTransit Sydney newspaper

There are also serious impacts for residents living in aged care facilities and for tenants who may find it impossible to find or afford comparable accommodation in Sydney.

(Also read: http://m4eis.org/2015/10/06/a-response-to-westconnex-m4-east-proposal-an-objection-from-a-haberfield-resident/ (http://m4eis.org/2015/10/06/a-response-to-westconnex-m4-east-proposal-an-objection-from-a-haberfield-resident/))

How to make an objection:

http://m4eis.org/2015/09/11/how-to-object/ (http://m4eis.org/2015/09/11/how-to-object/)

One thought on "**This is the story of Kevin – one of many older residents hit hard by Westconnex**"

1. **aurelia** says:
   29/10/2015 at 6:38 am Edit

   Thanks to your write up 2 weeks ago. I had numerous people call me and knock on my door to talk about their various stories. Its sad and upsetting that the most vulnerable people in our community the frail aged are put through such trauma in their later years. Most of them just want to live a peaceful life, enjoy their local community and die at home. With the new age belief in cars and motor ways….the frail aged are going to suffer the most. They don't drive….!!!! being the biggest issue and the lack of public transport makes them prisoners in their own home. It stretches their already busy families and strains the struggling aged care sector…..!!!! And the end result the individual feels like a burden to society they becoming depressed and giving up on life….I'm sure this project will cause premature deaths of many older people along its path and its sad that this has not had a mention in the ESI.

   Reply (http://m4eis.org/2015/10/28/this-is-the-story-of-kevin-one-of-many-older-residents-hit-hard-by-westconnex/?replytocom=261#respond)

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The Big Brother Theme (https://wordpress.com/themes/big-brother/).

Case study : Why won't RMS pay Kim Sun market value for his home?

29/10/201530/10/2015 wendybaconblog Commentaries & Objections Kim Sun, Mike Baird, North Strathfield, property acquisition, Roads and Maritime Services, Westconnex Free Counselling Service, Young St.

Interview by Nicole Gooch

For many, working to own your own home is an important part of life in Sydney, although it is increasingly unlikely for younger residents due to rising house prices. People work hard to meet expectations. The least they expect is that when it comes to the ownership of their home, they will be treated fairly.

In an earlier post, we discussed the impact of losing your home on older residents and the fears of those who would be left behind about what it would be like to live in the middle of a huge construction site for months, or even years. The picture emerging is far from what Premier Mike Baird called "doing everything we can in terms of compensation, looking after them, provide provision for a new home" or the low key distanced tone of the Westconnex GHD Social Impact study (http://m4eis.org/2015/10/28/this-is-the-story-of-kevin-one-of-many-older-residents-hit-hard-by-westconnex/)

But you don't have to be old to be severely affected by the threat of losing your home for less than its value, especially when all the stress you're experiencing leads you to call Westconnex's so called free counselling service and they don't ring back.

This is the story of Kim Sun whose home at 21 Young Street will be smashed for Westconnex.

For the past few months, Kim Sun has spent almost every weekend attending auctions and open home inspections in and around North Strathfield. He is desperate and stressed as house prices are way above what he can afford.

The thing is, Kim and his wife already own a lovely home in North Strathfield, which they have renovated bit by bit since buying it in 2006. They've added insulation, solar power and a water tank as they expected to stay in it a lot longer. Their six year old son rides his scooter with his dad to the local school and his grandmother lives a 5 minutes drive away in same suburb.

But in November 2013, Kim received a letter from the WestConnex Delivery Authority (WDA), informing him his house was to be acquired to make way for the motorway. It was the first he'd ever heard of the WestConnex. The family must now vacate by March next year, but Kim says WestConnex will only buy their house at nearly $200,000 less than market value.

"The price Roads and Maritime Services offer means we can only buy a home very substandard to the one we are living in. And time is running out. " says Kim.

"It's not right. It should be market value. That's what they say they are offering, and it's not. They are not doing the right thing by people. Considering the project is going to cost $15.4 billion, and they need our place, and they are stressing us out, why put on that extra pressure of offering below market value."

(https://m4eis.files.wordpress.com/2015/10/kims-house5.jpg)

WestCONnex/RMS has offered Kim Sun well under market value for his home

"It's a difficult situation too for me because my wife doesn't work, she looks after my son and the house. I am the only one working, so it makes it a bit difficult having to borrow extra money to find a place, so we can stay within the area, with what they are offering."

Kim says it's the same for everybody on their street: "We all seem to have a problem with getting the market value."

He knows others who have had to move to the Central Coast after their house was acquired, but that's not an option for the Sun family. "I don't want to change schools for my son, he likes it there, and mum is close by. I don't want to go somewhere else," says Kim, who catches a train from North Strathfield station or Strathfield station into work at Town Hall. "We were hoping to stay here a long time, which is why we set the house up comfortably."

The past two years of negotiations and uncertainty have taken their toll. Kim is struggling with stress and is on antidepressants. It's a situation made worse by a lack of communication from the WDA. "I've tried to call WestConnex myself, but they don't return calls," says Kim, who has kept a log of these calls, having been assigned a 'job number' for each. He feels "extremely disappointed and stressed" with the way WDA has treated his family.

In July this year Kim called WestConnex wanting to know by when exactly the house had to be emptied, and also asked about accessing the free counselling service on offer. His call was never returned.

A young family, work and an ailing mother already make for a busy life, and Kim says the last thing he needed on top of it all is to be "kicked out of my home in such a short space of time now".

Asked by the People's M4EIS what he thought of Premier Baird's comment about needing to make provision for the majority, Kim says: " If I was losing my house to public transport I'd probably feel less hurt by it. I don't think the WestConnex is going to solve our problems. For me public transport would be the way to go first. And I thought 'market value' was market value. I don't see why we have to negotiate so hard with them."

Final negotiations between Kim and RMS took place two days ago. Kim refused to accept the RMS offer of $1.445 million, the same offer as the one made in August. "That offer is way below my valuer's market value of $1.65mil," says Kim. "We will be going to the Valuer General."

(Ed:If you want to know more about Social Impacts of Westconnex, this submission (http://m4eis.org/2015/10/06/a-response-to-westconnex-m4-east-proposal-an-objection-from-a-haberfield-resident/) from a resident in Haberfield is very helpful)

3 thoughts on "**Case study : Why won't RMS pay Kim Sun market value for his home?**"

1. **justsoundstories** says:
   29/10/2015 at 10:23 pm Edit

   Thanks for sharing Kim's story. The WDA are disgraceful and many hundreds of families are in a similar situation.

   We need to demand an immediate enquiry or Royal Commission into this whole project.

A People's M4 EIS

Case study: Willows Nursing Home

28/10/201529/10/2015 wendybaconblog Commentaries & Objections Aged Care Facilities, Parramatta Rd., Sass Imbari, Willows Nursing Home

Aged Care Facilities – Case Study Willows Nursing Home

By Nicole Gooch and Wendy Bacon

According to the GHD EIS Social Impact report, at least five aged care facilities including hundreds of beds lie near the path of the M4 East.

Residents of aged care facilities or their families try to choose the best environment for their final home. High on their list of physical priorities are peace and quiet, a bright outlook and easy access for visitors.

Aged care facilities are both a home for residents and a business. While the EIS economic impact statement did not conduct any consultations with other businesses, 'social infrastructure' organisations such as churches, schools and health care facilities were asked for feedback and nearly all told Westconnex of their concerns.

The Willows Nursing Home was no exception. The GHD report records its many objections including noise, pollution and dust and anxiety about how visitors and staff would access the home both during construction and afterwards.

This is because if the M4 East was to proceed along the planned route, Willows Nursing Home would literally be in the middle of a construction zone and later next to the tunnel exit and unfiltered ventilation stack.

People's EIS interview with Sass Inbari.

Sass Inbari has owned Willows Private Nursing Home on Orpington Road, in Ashfield, since 1977. It was his father's before that and Sass built it up from 27 beds to 40. The home provides high care support to its elderly residents, and welcomes visitors from 8.00 am to 8.00 pm daily.

The Westconnex GHD social impact study notes that as a high care residential facility "the impacts of vibration and noise could be detrimental to health and wellbeing of residents."

Sass is concerned about the noise and dust occasioned by the demolition of the buildings immediately behind and next to the nursing home. Later there would be more disruption when this emptied space would be occupied as a construction site for the motorway and a parking lot for hundreds of large diesel trucks that will move in and out of the site each day.

The residents at the Nursing Home are frail and vulnerable. Staff are also upset and it will be a major inconvenience with road closures and works for relatives coming to visit, ambulances, delivery etc.

Bus stops on Parramatta Road are going to be moved, which means it will be harder for relatives to visit the residents.

Sass first heard about the Westconnex motorway on the news like everyone else, then about 3 or 4 months ago he got a visit from Westconnex representatives to discuss his concerns. "They took it all on board but I have not heard from them since," says Sass.

He wants compensation because of the impacts of the construction and of the operation of the motorway, and he is worried he is going to loose business.

He is angry too as he says he doesn't "know what good the Westconnex is going to do. All it will do is just shift the bottle neck towards the city."

He doesn't think people realise what impact the motorway will have.

All the other businesses around him, on Paramatta Road, have been purchased. Sass doesn't wish to be purchased, only compensated. He is stressed and frustrated as he feels there is nothing he can do to change the situation.

Submissions to the EIS close on November 2. Here
is how you can make a submission

http://m4eis.org/2015/09/11/how-to-object/ (http://m4eis.org/2015/09/11/how-to-object/)

Create a free website or blog at WordPress.com (https://wordpress.com/?ref=footer_website).
The Big Brother Theme (https://wordpress.com/themes/big-brother/).

Reply (http://m4eis.org/2015/10/29/case-study-why-wont-rms-pay-kim-sun-market-value-for-home/?replytocom=269#respond)

2. **wendybaconblog** says:
30/10/2015 at 3:51 pm Edit

I agree justsoundstories The more people find out about this project the more they are concerned about the failure to follow fair and proper procedures. There are ways of calling for a Royal Commission or public inquiry such as a online petition or letters to Premier Mike Baird. Newtown Greens MP tabled a petition with 10,000 signatures calling for a halt to the Westconnex project. This will be debated in parliament on November 19. Do you follow Westconnex Action Group facebook? It will keep you in touch with events
https://www.facebook.com/westconnexactiongroup/?fref=ts
(https://www.facebook.com/westconnexactiongroup/?fref=ts)
Thanks for posting on the People's EIS site

Reply (http://m4eis.org/2015/10/29/case-study-why-wont-rms-pay-kim-sun-market-value-for-home/?replytocom=281#respond)

3. **Sofia** says:
31/10/2015 at 11:07 pm Edit

My parents are about to loose their commercial property. They too are in negotiations with RMS for market value. They are also offering them and all the small business owners in our area (that they are acquiring) a value way below market value.
RMS are taking two approaches for business owners.
Where there is a lease in place it is a restriction and it makes the property less valuable.
Where there is no lease in place (even if the business has been there for a number of years) there is no business security and the business is valued at almost nothing. Then they value the property at a lower rate as well without a registered tenant.
I do not understand why we need to have continuous negotiations to prove the market value of our property. They should pay people whose lives they are ruining so that they can relocate and get on with their lives. We all want to stay in the local area, they should pay fair compensation for the area and stop low values on all the property.

Reply (http://m4eis.org/2015/10/29/case-study-why-wont-rms-pay-kim-sun-market-value-for-home/?replytocom=311#respond)

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A People's M4 EIS

Serious flaws in Social and Economic Impact study

02/11/201502/11/2015 wendybaconblog Commentaries & Objections AECOM, Ashfield Council, community consultation., GHD, Social Impacts. Economic Impacts, Willows Nursing Home

(The People's EIS has already published a number of individual stories that demonstrate the severe social impact of the proposed project. We have suggested that the GHD Social and Economic Impact study that was prepared in conjunction with AECOM is inadequate. These reports were contained in Appendices M and N and were combined into a single chapter in the main report.)

The reports find major short term impacts would be experienced in Haberfield, Homebush and elsewhere. Here is a summary of the reports (http://m4eis.org/2015/10/04/summary-of-m4eis-social-and-economic-impact-reports/).

The consultant recommends mitigation for a number of potential impacts but overall the report fails the convey the seriousness and significance of impacts, some of which are already occurring.

This post presents some additional reasons why the social and economic impact reports are inadequate.

- a lot of the work for these reports was done in 2014 when the proposal was for a different route than the one finally chosen by the Westconnex Delivery Authority. This work consisted of a desktop collection of official socio-economic and demographic data and consultations with Councils and social infrastructure organisations. The report appears to have suffered from insufficient time or resources to adjust to the route announced in 2015. Despite the devastating impact of the preferred route on Haberfield and Ashfield, the consultant did not update the consultations with Ashfield Council and so the reports failed to convey the significance or seriousness of the impact of the removal of homes and loss of heritage in the Haberfield area. Most of the report consists of basic data with little analysis.
- in the process of rushing to adjust to the new route, the consultant ignored potential impacts on some organisations such as the Dobroyd Point Primary school.

- because she was not in touch with the area and had limited time, the consultant was not aware when she wrote the report of the extent of dislocation that is already being experienced by many people being forced to move from their homes. She recommends mitigation measures such as counselling support for people experiencing stress from forced relocation are quotes Westconnex as stating that this support now exists. The consultant appears to accept and restate Westconnex's official version of their policies bu6 residents have reported to the People's EIS that they have not received support from Westconnex. While more research is needed and it could be true that some residents are more satisfied than others, there is enough evidence to show that WDA assurances on mitigation measures cannot be taken at face value. The consultant also recommends further support as if social impacts due to forced acquisition would occur in the future when in reality they are already happening now. This is one of the ways in which the GHD study lacks sufficient independence from the WDA.

Framework for analysis not applied

The report sets up a three way methodological framework for analysis in space, time and strength of impact (Chapter 14. Section 3) but barely refers to it again in the report. When asked about this the consultant said that in making her decisions and recommendations, she exercised her "professional judgement." The approach is not transparent and is superficial. This is worrying when one considers that the consultant did not do any field work. This explains the very distanced tone of the report. There are few case studies or examples provided of impacts on the community.

It is difficult (including in the SIA and EIA appendices) to see how the methodology was used.

For instance,

- how does the Economic Impact Assessment come to the finding that, 'Overall, the assessment has concluded that the positive impacts on businesses and the economic benefits of the project are expected to outweigh any negative impacts that cannot be satisfactorily mitigated' (Appendix N, p. 9–1)?

- The social impacts of transport infrastructure, prior to analysis (given in the methodology section), are considered to be 'property acquisition, community networks and amenity' (Chapter 14, p. 2), an insufficient starting point for a project of this scope and impact.

- 'City of Sydney Council LGA is outside the project footprint and would be indirectly affected'—at this scale transport infrastructure would be expected to affect traffic flows and the central city of the region in which it is implemented. The indirect impacts are not explored.

The methodology section also refers to extra social research that was conducted in additional to the desktop review. No bibliography was included for this and there is no indication in the report about this social research.

Case studies from failed projects

The Social Impact assessment uses social impact studies of earlier failed tollway projects as case studies without explaining that they failed. In these cases, social impact studies found that despite likely negative social impacts, the tollways were justified. It is surprising that AECOM which is currently being sued by investors in the Clem7 for negligent traffic modelling would put forward its social impact assessment as a useful case study. The intended purpose of the case studies is not clear. It appears to be 'padding'.

The social impact study states there will be impacts without investigating their costs and depth. Simply listing social infrastructure within the study region cannot be defined as social impact assessment—nowhere (either in Chapter 14 or in the Social Impact Assessment) is there a systematic review of each piece of (social) infrastructure against a best-practice framework to determine whether it will be affected and, if so, the extent to which it will be. It is not sufficient to merely record the concerns of organisations such as occurred in the case of the Willows Nursing Home (http://m4eis.org/2015/10/28/case-study-willows-nursing-home/).

Minimal Stakeholder and Community Involvement:

- there were no direct consultations conducted with local businesses for the economic impact report. This would appear to be a major gap in the collection of data.
- When evaluated against the international IAP2 Public Participation Spectrum (https://www.iap2.org.au/resources/iap2s-public-participation-spectrum) the 'community involvement' centres around 'informing' (the lowest stage on the spectrum with the least impact on decisions) and only rarely could be considered 'consultative' (the second lowest). There have been many complaints about the whole consultation process and slow and vague information provision. This is relevant to the entire planning process but is particularly concerning in relation to the social impact assessment because the consultant openly acknowledges that she did not directly consult with anyone in 2015 preferring to pass questions through Westconnex communications staff who were also promoting the project, dealing with media inquiries, managing EIS sessions and communicating with people who were being forced to move. This compromised the independence of the SIA and EIA reports. It also explains why the feedback tables provided in the report are out of date and do not take account of the impacts of the new route.

On page 95 of Appendix M, the consultant states that a preconstruction consultation framework would be developed,

> The framework would ensure that local residents, businesses and workers are provided timely and clear information in regard to local changes and progression of project construction and operation. Project communication would consider the cultural and linguistic diversity in the project local study area in communicating project information effectively in community languages (i.e. through translation, use of interpreters, specific language broadcast services and cultural organisations).

This recommendation is well-meaning but is hard to take seriously when there have been constant complaints about the nature of the consultation and communication provided.

Minimal mention of health and heritage impacts

While seemingly significant heritage effects are identified in Appendix M as well as concerns raised by local councils regarding this, the only mention in the main document's Chapter 14 Social and economic comes briefly under 'Section 14.4.2 Changes in amenity' ('loss of heritage items and changes to streetscapes') and concerns brought up during community consultation (Section 14.1.4).

Health impacts are mentioned in Appendix M (p. 87) as 'worst case assessments without mitigation would likely generate health impacts for some receivers during some works'. These are not elaborated.

Chapter 14. Mentions of 'health' are otherwise limited to issues raised during community consultation (section 14.1.4), under construction impacts and operational impacts as 'Health of the community' (though no further information is given), and in broad terms (such as 'Relocation health risks' or 'important for community health').

Given community health concerns (and those raised during consultation with the public and councils), this issue needs to be better addressed to ensure the appropriate 'mitigation' measures as mentioned are followed.

Inadequate Economic Impact Assessment

The EIA (Appendix N) is not based on a sound business case or cost-benefit analysis, thus limiting detail and the accuracy of any findings made. For instance there is no consideration of negative, direct or indirect effects to the 'wider state economy' (Appendix N, p. 6–1), despite consideration of several positive indirect or cumulative effects.

For the purpose of the EIA, an affected business has been defined as a 'business that would be impacted by property acquisition, changes in amenity, changes to accessibility or changes in the volume of passing trade due to the construction and operation of the project'—though a figure for the actual total number of businesses these changes affect is not provided in the EIS.

The geographical scope was wider (including the wider state economy) for the EIA (Appendix N) than the SIA (Appendix M) but this is not explained in Chapter 14 Social and Economic where analysis takes places seemingly simultaneously between social and economic impacts, at differing scales. This is extremely confusing.

In 'Chapter 14 Social and Economic', Appendix M and Appendix N, cumulative benefits are given preference – such as overall travel time improvements to 2031 once all project sections are complete, while cumulative negative impacts of the overall project are largely overlooked.

If cumulative negative aspects were considered, the opportunity cost of not spending $15.4 billion on a more efficient transportation system (or any public asset) could be evaluated (if the benefits are considered for the whole project at a NSW scale, so too should the negative aspects). Instead, the EIA is by its own admission predominantly 'a qualitative assessment of the impacts' (Appendix N, p. 3–4), despite its use of economic multipliers as a quantitative measure.

Relationship to other technical reports

The consultant claims to have reviewed all the other technical reports but since most of these were not ready until shortly before submission, the review is unlikely to have been an in-depth one. Any deficiencies in these reports -e.g. the noise report – would have implications for the social and economic impacts of the proposed project and be an additional reason to review the findings in these reports.

Lack of Independence from commercial interests

There are independent social researchers both in universities and elsewhere who could have done a high quality social and economic assessment including a cost benefit analysis of the M4 East proposal. GHD is in a number of infrastructure markets (http://www.ghd.com/global/markets/). These markets do not include social infrastructure or research. This raises questions about whether there is sufficient protection of the public interest in the planning process.

(Wendy Bacon, Anthony McClosker and Nicole Gooch have contributed to this post)

For other reports relevant to Social and Economic Impacts read:

Summary of Social and Economic Impacts: http://m4eis.org/2015/10/04/summary-of-m4eis-social-and-economic-impact-reports/ (http://m4eis.org/2015/10/04/summary-of-m4eis-social-and-economic-impact-reports/)

Dr Victor Storm : http://m4eis.org/2015/11/01/dr-victor-storm-response-to-westconnex-m4-east-eis/ (http://m4eis.org/2015/11/01/dr-victor-storm-response-to-westconnex-m4-east-eis/)

Sharon Laura: http://m4eis.org/2015/10/31/submission-by-sharon-laura-of-haberfield/ (http://m4eis.org/2015/10/31/submission-by-sharon-laura-of-haberfield/)

Aurelia's Story: http://m4eis.org/2015/10/14/westconnex-comes-to-underwood-road-homebush-aurelias-story/ (http://m4eis.org/2015/10/14/westconnex-comes-to-underwood-road-homebush-aurelias-story/)

Kim Sun's story: http://m4eis.org/2015/10/29/case-study-why-wont-rms-pay-kim-sun-market-value-for-home/ (http://m4eis.org/2015/10/29/case-study-why-wont-rms-pay-kim-sun-market-value-for-home/)

Kevin's Story: http://m4eis.org/2015/10/28/this-is-the-story-of-kevin-one-of-many-older-residents-hit-hard-by-westconnex/ (http://m4eis.org/2015/10/28/this-is-the-story-of-kevin-one-of-many-older-residents-hit-hard-by-westconnex/)

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A People's M4 EIS

Note explaining Automobile dependence, peak car use and induced traffic

30/09/201525/10/2015 wendybaconblog Commentaries & Objections Car Dependence, Induced traffic, Marchetti Constant, Peak car

Automobile Dependence

The situation where our choices and ability to move around the city are constrained by our access to a car, and where 'use of an automobile [becomes] not so much a choice but a necessity' (Newman & Kenworthy, 1999, p. 32).
Good sources for more information on automobile dependence's causes and implications for cities are Newman and Kenworthy's (1989) book Cities and automobile dependence and the website http://www.vtpi.org/tdm/tdm100.htm (http://www.vtpi.org/tdm/tdm100.htm).

Peak car use

Though most cities around the world have demonstrated some level of car dependence over the last fifty-plus years, growth in car use in Australia and other developed countries peaked in 2004 and is now decreasing in a trend known as 'peak car use' (Newman & Kenworthy, 2015). As both a cause and result of this trend is the fact that cities are no longer being planned solely around the automobile (Newman & Kenworthy, 2015, p. 5). Newman and Kenworthy (2011, pp. 33-37) discuss six potential causes for this trend:

People are generally willing to 'budget' for one hour of travel per day

The 'Marchetti constant' (Marchetti, 1994; Newman & Kenworthy, 1999) suggests that when our cities become 'one hour wide' (Newman & Kenworthy, 2011), or about 50km wide given average car speeds of 50km/h, further expansion beyond this limit becomes less attractive and

traffic becomes a problem within these limits, because the time we are generally willing to spend travelling each day is exceeded. Thus, we see cities slow in their expansion, public transport becomes an attractive way to avoid traffic, and locations closer to destinations become preferable.

Public transport is increasing in popularity

This trend is due to a number of reasons, not least the high cost of owning and running a car, and preferences for people, especially younger generations, to use their commute times to do other things than drive (for instance reading and using their devices for any range of activities).

The reversal of urban sprawl

Densities in cities are increasing comparatively to rates of sprawl due to consumer preferences and government policies. Less sprawl and more people living closer together and closer to places they want to go leads to reduced reliance on cars to do so.

The ageing of cities

Many cities in developed countries are experiencing a rise in the average age of their citizens, and on average people drive less as they get older.

The growth of a culture of urbanism

As young people moving out of family homes, older people are moving back towards city centres from suburbs, as young people too are showing a preference for inner-city life over suburban life, and for other forms of technology over cars.

The rise in fuel prices

Given relatively high fuel costs and price instability, the ownership of a car and its regular use becomes increasingly expensive and decreasingly appealing.

So what does this mean for Sydney?

Sydney is already greater than 'one hour' wide (Penrith is 70km from the CBD by car), public transport is increasingly popular (90% of western Sydney commuters into the CBD come by public transport already) (SGS, 2015), the city is densifying, renewing and reducing the rate at which it sprawls (consider urban renewal projects proximate to the CBD such as at the bays precinct and Green Square), Sydney's average age is increasing along with Australia and most other developed countries, there is a strong culture of urbanism (such as increasing consumer preferences to live within walking distance of 'centres' such as Parramatta) and fuel prices (and toll costs) that continue to impact car owners, especially those with the least ability to afford it.

Sydney is not on a different path to other cities of the developed world. It too is in the middle of 'peak car', meaning that the need exists to reprioritise infrastructure provision to reflect and adapt to this trend.

Induced traffic

Induced traffic occurs when congested motorways increase in capacity (Zeibots, 2007). This increased capacity leads to faster travel times initially, though also gives people more time to travel further by car (as they spend less time travelling on their original trip—and given our travel budgets of up to an hour a day) and also increases appeal for others to either swap travel mode (eg swapping from public transport to car after a motorway expansion) or to create new journeys by car themselves. The 'induced' demand, this creation of new trips and new users of the roadway, ensures that 'congestion-busting' efforts that rely on expanded road capacity are ineffective and is the major reason that even the most traditionally car-dependent cities are turning to alternatives for transportation (such as light rail projects in Phoenix, Dallas and LA, see http://www.houstonchronicle.com/local/gray-matters/article/Why-car-crazy-cities-are-riding-the-rails-6496939.php (http://www.houstonchronicle.com/local/gray-matters/article/Why-car-crazy-cities-are-riding-the-rails-6496939.php)).
For an easy to read look at induced traffic, see: http://www.wired.com/2014/06/wuwt-traffic-induced-demand/ (http://www.wired.com/2014/06/wuwt-traffic-induced-demand/)
.

The relationship between peak car and induced traffic—could they happen at the same time in Sydney?

Yes. Peak car is a global occurrence especially common in developed nations. We saw peak car use in Australia in 2004, when the rate of increase in automobile use slowed, and it is a trend that will continue given the other associated societal trends listed above. On the other hand induced traffic relates to location-specific expansions in road capacity. So Sydney certainly could be exhibiting an overall peak in car use while at the same time drivers and everyone else suffer from government decisions that directly lead to more traffic.

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The Big Brother Theme (https://wordpress.com/themes/big-brother/).

Westconnex fails Objective 10 : Protect natural & cultural resources and enhance environment

23/10/201525/10/2015 wendybaconblog Commentaries & Objections Asbestos, Beverly Hills, Cooks River Iron Bark Bushland, Erskine Park, Green and Golden Bell Frog, Grey Headed Flying Fox, Haberfield, Kathy Calman, property acquisition, salinity, Westconnex Core Objective 10, wetlands

(Editor: This is the third submission prepared from the perspective of the Objectives of the project. The other two did an overview analysis of all ten objectives – here (http://m4eis.org/2015/10/17/does-westconnex-meet-its-core-objectives/) and here (http://m4eis.org/2015/10/18/objectives-of-the-m4-project-yet-another-response/)

By Kathy Calman

(Kathy Calman is the co-convenor of the Beverly Hills Kingsgrove WestCONnex Action Group (https://www.facebook.com/notowestconnexbeverlyhills?fref=ts). She knows a lot about motorways because she has lived beside the M5 at Beverly Hills for years. She knows what it's like to be woken by truck noise in the middle of the night, to count the high percentage of cars with single drivers and she recently watched open space and trees she and other members of her community had planted being stripped away for the King Georges Rd interchange that Westconnex's own figures show will save little or no time for commuters. The community were told that the noise walls that offer some protection from M5 noise would come down for about 15 weeks. The Editor was told by the construction company Fulton Hogan that it could be up to 7 months. No wonder she warns residents of being wary of accepting promises about mitigation of construction impacts that could turn out to be wrong. She's also aware that native flora and fauna saved as a condition of the M5 would go if the Westconnex M5 duplicate is allowed to go ahead.)

(https://m4eis.files.wordpress.com/2015/10/11222423_1873063222917859_3341986940853463042_n3.jpg)

Kathy Calman at Westconnex Action Group early morning stall outside Westconnex headquarters with her frog cakes

Analysis of Core Objective 9 : Protect natural and cultural resources and enhance the environment.

The Westconnex's Core Objectives are drawn from the NSW Long Term Transport Master Plan (Transport for NSW 2012a)

The Westconnex project does not meet this core objective

Features of the M4 East project include: Widening roads; unfiltered exhaust stacks close to homes, schools and aged care centres; destruction of trees; temporary and permanent loss of greenspace; induced traffic onto local roads; impact on wetlands, groundwater and endangered species; exposing residents to prolonged high impact acute noise 24/7; hundreds of significant truck movements a day impacting on the safety of residents particularly primary school children; isolation; community dislocation; car dependence.

None of these factors enhance the environment. In fact, this proposal has a very significant negative impact on the urban and natural environment where over a quarter of a million people live and 64,000 work in the M4 section. It will remove valuable cultural resources including heritage buildings.

Sectional planning approach

I **object** to the sectional planning project approach to the 33 kilometre Westconnex motorway. This prevents serious consideration of the impacts of the larger Westconnex project. **While broad justifications for the whole project are used to justify local threats, there has been no overall analysis and evaluation of the environment threats from the whole project.**

This submission endeavours to take an **holistic approach** to the project and refers to both the M4 and M5.

Community Consultation

I object to the poor standard of community consultation.

Many people have reported that the information kiosks and material provide inadequate and misleading information to the public. The kiosks are attended by casual staff with no background experience or education on the subject matter.

Claims of 'busting congestion' and the various time savings getting from point to point are contradicted even within Westconnex's own EIS, not to mention independent infrastructure experts with worldwide experience (https://www.facebook.com/NoWestconnex/videos/658196694322742/) that slam this project as backward looking and based on poor transport planning principles.

The negative impact on thousands of people is either glossed over or embedded somewhere in the fine print in the Westconnex M4 EIS.

- Western Sydney is not aware that their daily commute will become a lot more expensive via new and reintroduced tolls
- Australian and especially NSW tax payers are taking the full risk on the viability of this project
- Unfiltered exhaust stacks – nine for this project spaced roughly every 3km.
- Increased pollution and noise
- Acquisition of parks, green space, homes and business
- Loss of local employment. (Estimation of hundreds in Haberfield alone).
- Impact on non-acquired businesses with loss of passing trade opportunities
- Local roads will be more congested and travel times for many longer
- Loss of an opportunity for NSW to invest in worthwhile public transport infrastructure that is the most efficient way to provide to move masses of people and freight and better meet the needs of the whole of NSW.

Social Impacts

Significant impacts on residents and businesses

Home acquisitions

The stated recommended mitigations in Appendix M is contradicted by actual outcomes. Home Owners (reported (http://www.smh.com.au/nsw/residents-offered-far-below-market-value-for-homes-needed-for-westconnex-lawyer-says-20150702-gi3puf.html) in the media) claim that lower than market value is offered for their homes and that they are bullied by RMS staff. Longstanding communities members are being forced to move far from their social networks (http://www.altmedia.net.au/baird-accused-of-being-blind-to-westconnex-pressure-on-older-residents/111184).

Renters are also having to seek legal advice for relocation compensation. One long term renter in the same home for 18 years was only offered $5000 to relocate.

The disadvantaged residents in social housing (including independent homes for people with special needs) of RMS property have not had their needs addressed in the rush to evict hundreds of people from their homes.

Most of these people forced from their homes will likely find they have to move some distance away from where they have established support networks. This would be particularly hard on the frail and elderly.

I object to the mitigation of offer of 'counselling' which even if it does exist (and some say it has not been offered to them) would be of little assistance.

Impacts on social facilities

In the area impacted by the project, there are:

- 8 aged care and nursing homes
- 5 primary schools, 3 high schools and 3 kindergarten to Yr 12
- 5 childcare centres and one tertiary education provider
- A number of sports and recreation facilities
- Religious services a
- Shopping centres

I object to the 'mitigation' for organisations that will be left near the tollway construction site (such as the Willows Private Nursing Home and Peek-a-boo Child Care Centre) described as "consultation for 'relief periods' from 24 / 7 construction (destruction) if "feasible and reasonable". This proposal is shallow and unacceptable.

This is an inhumane approach towards the most vulnerable in our society.

(https://m4eis.files.wordpress.com/2015/10/img_3433.jpg)

Students from Haberfield Primary School protesting on the pedestrian bridge after school

Amenity Mitigation

This project will have a high impact on thousands of people. Noise 24/7 for three years, loss of visual outlook, and views of construction (destruction) compounds should not be trivialised. This is a prolonged construction period.

I object to the suggestion that decorating hoardings and some temporary plantings around the compounds is 'mitigation'.

Sports fields

Locals and visiting teams will be playing active sport within an environment of elevated pollution. Emissions from modern vehicles contains fine particulate matter that can penetrate the cells of lungs. (See Air quality submissions here (http://m4eis.org/2015/10/15/environmental-justice-westconnex-and-air-pollution/) and here (http://m4eis.org/2015/10/22/comments-on-air-quality-impact-statement/).

I object to a project that places the health of the community at risk.

Unsafe Removal of Asbestos.

This dangerous substance has been located in several locations across the Westconnex project already. There is evidence (https://newmatilda.com/2015/10/02/westconnexs-asbestos-problem/) that trucks removing asbestos have not been following appropriate safety standards such as sprinkler systems,

washing down trucks before departure, and neglecting to properly cover loads.

I object to the contempt Westconnex has shown for the health and safety of residents (http://www.jennyleong.org/government_forced_to_recognise_westconnex_asbestos_concerns) within the locations and on route to Erskine Park where soil contaminated with asbestos has been dumped without being wetted or properly covered at the time of disposal.

Divisive Infrastructure

I object to a 'solution' that results in a dreadful outcome on the amenity for all impacted suburbs. A wide, dirty and noisy toll road and the spaghetti interchanges thrust through suburbs that form part of Australia's 19th and 20th century history including the destruction of heritage listed homes and historic buildings.

Mental Health

The stress imposed on people by the Westconnex will increase the likelihood of anxiety and depression. The grief people will experience watching the suburb and urban landscape they love permanently destroyed has not been sufficiently addressed in the EIS social impact statement.

The permanent impact of this toll road on thousands of people's physical and mental health through

- visually divisive spaghetti interchanges
- noise barriers -that we know little care to landscaping for residents will be addressed –ref M5 KGR landscape design aka bare noise walls
- prominent and unfiltered exhaust stacks a constant reminder that residents and workers and their families are being poisoned by high levels of pollution
- loss of accessibility by pedestrians and cyclists
- impacts on the elderly for mobility, safety, connectivity and isolation
- impacts to the community and schools with the loss of neighbours
- impacts on the significant number of people forced to leave their home and community – loss of social networks and loss of school mates.
- stress and anxiety brought on by living in a permanent high noise and highly polluted environment.

Cumulative Impacts

Claims of reduced traffic on Parramatta road and improving amenity are unsubstantiated. The traffic congestion on the Parramatta road corridor will not improve (source your EIS). With a better solution to mass transport people (public transport) not addressed and increasing population, Parramatta Road will remain congested.

Impact on businesses

There are approximately 600 permanent jobs that will disappear due to this project due to property acquisitions at Haberfield alone. Remaining businesses, including aged care and child care centres, are likely to fail or suffer significant loss of trade. Suggestions that the patronage of construction workers will augment the local economy seem to be clutching at straws to find a solution here.

Social Infrastructure

Stated mitigation – Landscaping treatments for the benefit of residents. Let's revisit the landscape design of the King Georges Road Interchange – hundreds of metres of bare noise walls because it is easier for the maintenance crew to inspect. Never mind the residents or professional pride or genuine appreciation for the huge disruption caused to residents. Ugly bare walls.

I object to the likely outcome facing residents of the landscaping treatments being a typical, visually divisive structure.

Loss of vegetation

- Tree canopy for the communities along the 33km route of WestCOnnex is less than 19%. This polluting tollway will remove even more precious greenspace.
- Even a single hectare lost is devastating for highly urbanised communities, particularly where the shared greenspace is all they have.
- WestConnex has not included the overall acquisition of greenspace across the whole Westconnex project in any of its community 'information' material to enable the general public to form an informed opinion of the costs and benefits of the project.

Car Dependence

Build a city for the people – and they will come. Build a city for cars – and congestion will prevail.

Ironically, it is these suburbs – targeted for destruction by Westconex – that demonstrates what the NSW Govt should be the planning for new outer suburb communities. The walkability factor – with ready public transport and local shopping centres. Local employment opportunities or employment centres (including high value jobs) within 60 minutes by public transport. Shared community spaces for gardening and leisure and social connectivity. Cultural and entertainment facilities for all ages.

The infrastructure planning for the new western suburbs, such as near Camden is woeful, with only 7% of Camden residents using public transport. Westconnex promotes socially isolating car dependence and the environmental impact of ever increasing traffic noise and air pollution – and does not provide residents of the western suburbs with any relief from congestion.

I object to this proposal as it is the wrong project for the wrong time.

Biodiversity and natural environment

Australia has the notorious distinction of having possibly the worst extinction record on earth according to Richard Kingsford, professor of environmental science at the University of NSW. This is predicted to continue without serious changes to the way we conserve our environment

Endangered Fauna

Green and Golden Bell Frog

Scientists are studying several species of Australian frogs – including the endangered green and golden bell frog – whose skin secretions are toxic to the multi-drug-resistant golden staph know as MRSA. The GGBF secretions may be the wonder drug of the 21st century. Yet, the overall WestConnex project will more than likely be responsible for the extinction of such an important species.

Rare Grey Headed Flying Fox

The cumulative loss of vegetation for this vulnerable species in the M4 and M5 sections will significantly contribute to the endangerment of yet another species. These flying foxes forage on vegetation regardless if it is original or planted. The Office of Environment and Heritage states that the continued removal of foraging vegetation – and the forced concentration of populations into smaller regions – will result in a continued decline in their numbers.

Eastern Bentwing Bat

The impact on this species will be the loss of foraging habitat and the disturbance of roosting sites. Again, as similar to all of our native animals within Sydney metro, the significant and continued loss of vegetation will have a serious impact on these local communities.

Cooks River Castlereagh Iron Bark bushland

Another cumulative impact on our natural environment, with the loss of a critically endangered stand, a development condition of the first M5, will be destroyed.

Wetlands

Wetlands provide significant economic, social and cultural benefits. They are important for primary products such as pastures, timber and fish and support recreational and tourist activities. Wetlands also help reduce the impacts from storm damage and flooding, maintain good water quality in rivers, recharge groundwater, store carbon, help stabilise climatic conditions and control pests. They are also important sites for biodiversity.

Wetlands cover about 9% of the earth's surface and are estimated to contain around 35% of global terrestrial carbon. Wetlands act as sinks for carbon dioxide and other greenhouse gases, especially if their vegetation is protected and their natural processes are maintained.

The proposed F6 extension (which is referred to as a given in the EIS although it is not even in early stages of planning) will likely also impact on the Rockdale wetlands – another significant loss to our natural and human environment.

I object to the sectional approach taken to the Westconnex project which makes it difficult to properly assess the cumulative impact on our wetlands across both Westconnex and Southconnex

I object to the unwarranted destruction of what remains of our natural environment for a project which is managed by politicians and business people who continue to hide the business case on which it is based. Westconnex managers have been unable to properly debate or refute the many informed critiques of the project.

Flooding

During construction, there is the potential for local catchment runoff to enter project excavations at the interchange locations and impact the construction ancillary facilities. Construction activities also have the potential to exacerbate flooding conditions in adjacent developments. The mitigation stated are physical barriers designed to protect the works areas and tunnel entries so as not to increase flooding conditions in adjacent areas. The public needs full independent advice on the safety of the tunnels which is not possible in the short period allowed for consultation.

Urban Salinity

I am concerned about the potential for salinity damage that can shorten the life of urban infrastructure such as roads, buildings, water and sewage pipes. This leads to costly maintenance and repair by homeowners and councils.

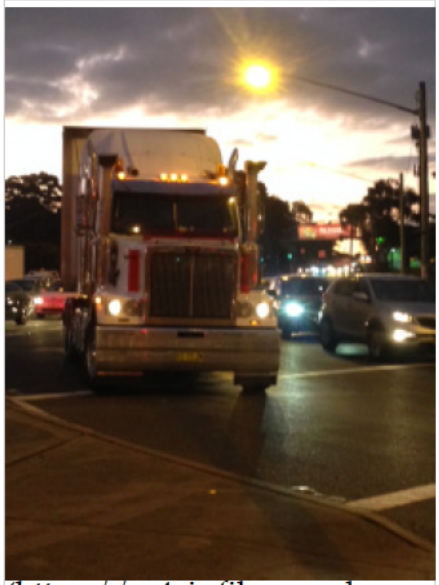
The movement of excess water and salt in parks and gardens can affect plant growth and cause plant death. Sports grounds and recreation areas affected by urban salinity may become bare, unattractive and unusable. Soil properties can be altered significantly making it hard to revegetate these areas.

Pockets of native vegetation in and around urban landscapes may also be affected. This can have serious consequences including the disappearance of native flora and fauna and poor downstream water quality.

I am concerned about the impact of groundwater and the potential for increased risk of flooding due to the reduction of greenspace.

The public needs access to more independent technical information so that they can understand the true impacts of the project.

I conclude that Westconnex comprehensively fails one of its claimed core objectives – *'Protect natural and cultural resources and enhance the environment'* is not met by the Westconnex project.



(https://m4eis.files.wordpress.com/2015/10/img_3108.jpg)

Trucks waiting to get onto the M5 at Beverly Hills

Here's another strong submission from a resident at Haberfield (http://m4eis.org/2015/10/06/a-response-to-westconnex-m4-east-proposal-an-objection-from-a-haberfield-resident/).

Aurelia's story from Homebush (http://m4eis.org/2015/10/14/westconnex-comes-to-underwood-road-homebush-aurelias-story/) also provides more on the social impacts of Westconnex.

Here's a summary of the Social and Economic Impact Report (http://m4eis.org/2015/10/04/summary-of-m4eis-social-and-economic-impact-reports/)

(https://m4eis.files.wordpress.com/2015/10/img_3305.jpg)

Kathy Calman knows from experience what it's like to live near a motorway. Her house in Beverly Hills

One thought on "**Westconnex fails Objective 10 : Protect natural & cultural resources and enhance environment**"

1. **Kathryn** says:
   24/10/2015 at 10:01 am Edit

   The M5 King Georges Road Interchange – Cooloongatta Rd – the noise wall situation is getting worse. An error that we pointed out a year ago in the EIS stated our noise walls were 2.5 metres. They neglected to record that there was a 2 metre mound, making it 4.5 metres (and still we are above RNP night time noise goals at that level).

   According to Fulton Hogan – its 3 metres in the EIS and 3 metres we are getting (though the EIS actually recommended our walls should be 8 metres). To make matters worse, we are getting plastic walls. 128 metres of the stuff – instead of concrete barriers. Nice view of 12 lanes of highway!. Thanks residents for putting up with the destruction for 19 months. Here is the payback. An unliveable suburb.

   Reply (http://m4eis.org/2015/10/23/westconnex-fails-objective-10-protect-natural-cultural-resources-and-enhance-environment/?replytocom=180#respond)

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A People's M4 EIS

Why no extension for consultation ?

02/11/201502/11/2015 wendybaconblog Commentaries & Objections Brent Devine, David Gainsford, Extension of Time

For months, local councils, MPs and groups opposing Westconnex have been asking for an extension of the consultation period. The minimum period is 30 and groups requested either a minimum of 60 days or three months. When the EIS turned out to be 5000 pages, the community groups renewed their calls including staging a 'read-in' of the EIS at the Department of Planning. The Department granted 45 days and this was extended for a further ten days when Westconnex failed to file all the documents correctly.

On the face of it, the requests for an extension for such a huge project would seem very reasonable – the refusal to provide an extension or even to give reasons for not providing one fuels community fears that the process is only a sham.

This letter was sent by one of the People's EIS team Wendy Bacon to the Senior Planner responsible for the M4 East assessment in the Department of Planning Brent Devine on October 13, 2015.

Dear Brent,

Thank you for speaking with me this morning. The point of my call was to express my concern about the lack of time granted to the community to respond to nearly 5000 pages of EIS. Originally the community was only given 45 days, although the community affected by the Northconnex was given 60 days. This seemed unfair and disproportionate given the difference between the projects. The period was extended after Westconnex failed to properly file their documents.

This is a huge EIS report and its social impacts are complex and affect thousands of people and a number of communities. It is hard to think of an urban project that could have more impact than the Westconnex series of tollways. On the other hand, the EIS documents are not easy to absorb or to handle. There is much repetition and the actual analysis is often hard for the public to identify. I have found that important material is in the appendices so one cannot rely on summary chapters. The task is not made any easier by the lack of page numbers in some sections. PDFs are also difficult to deal with, especially when one is trying to check similar material in different technical reports.

My greatest concern is that a number of serious technical issues have arisen which could affect the health and safety of communities that many feel require independent advice. Given that the communities have very limited resources, it is necessary to seek advice from volunteer qualified advisors who can only

address these issues out of hours. With only 20 days to go, these issues cannot be dealt with adequately by the community. Even Councils are stretched to respond. I am particularly concerned about this because I was told by a consultant at the EIS session in Strathfield last Saturday that she did not consult with Ashfield Council on the actual route of the project. Businesses were also not consulted directly. This means that this is the first and perhaps only chance that communities have a chance to respond to the EIS on the actual route which is quite different from that originally proposed.

If the law allowed for hearings or even merit review, the time restrictions might not worry me as much or seem so unjust. However given the amount of public money at stake and the risks to health, safety and the future mobility of residents and visitors to our city, it would seem to be foolish not to allow the more adequate period of at least three months for consultation.

Please acknowledge receipt of this email. There are many community complaints about Westconnex's poor approach to community consultation. Now residents and groups tell me that they are worried that they will not be able to get their submissions done in time. I trust you will respond very soon as time is running out.

Yours sincerely,

Wendy Bacon

After 10 days, I sent this follow-up email part of which read:

Dear Brent

I have tried to call you – maybe I missed your call back.

I wrote you a quite detailed letter and I expected to at least get some reasons back.

There are now 11 days to go….

I do not know why the government is being so unreasonable but Minister Stokes office says it is up to the Planning Department in which you are the responsible person although not ultimately the decision maker.

There are massive flaws in the EIS and I think the community should be given the time to respond.

On October 22 with 11 days to go, I received this response from Brent Devine:

Hi Wendy,

I realise it has been over a week since your email, and I have escalated your request to the executive staff.

I will follow up and can hopefully provide a response shortly.

Regards,
Brent Devine

A few days later I received a letter from the Executive Director Priority Projects Assessments Planning Services David Gainsford declining my response but offering to post my letter seeking an extension as a response to the EIS. I was asked to communicate my consent back to Ms McCourt.

Here's a slightly edited version of what I wrote back:

Dear Ms McCourt

After waiting more than 10 days for a response from the Department about the an extension for submissions to the M4 East I received a letter from David Gainsford Executive Director Priority Projects Assessments Planning Services.

Disappointingly this letter provided no reasons for not extending the submission period, other than to state it had already been extended from the ludicrously short minimum period of 30 days due the "anticipated level of public interest."

The level of interest is indeed high. This is because many critics of the project are seriously concerned that Westconnex is a short signed and damaging project for Sydney in the 21 century. The are concerned that rather than helping solve Sydney's transport problems, Westconnex will saddle the public with traffic congestion for decades to come as well as great financial costs including loans that will be paid off over many decades .This project has grave implications for impacted communities including health costs that have not been properly assessed in the EIS. To quote Sydney psychiatrist , "Westconnex is slow moving disaster for local affected communities. The disaster is easily avoidable and should be avoided by not proceeding headlong with this project."

I note that you say: "As part of the assessment process, the proponent will prepare a response to all submissions received. This response will be made publicly available on the Department's website. I can assure you that the Department will conduct a rigorous assessment of this proposal and carefully consider all issues raised in submissions prior to making its recommendation to the Minister for Planning."

In the light of this guarantee, I look forward to reading a detailed response to the many arguments that have been raised by critics of the Westconnex which do not so far appear to have penetrated the closed thinking of those who prepared the EIS reports. It was disappointing to see that there was no engagement in the EIS with the significant criticisms raised by SGS Consulting that were hired by City of Sydney earlier in the year to prepare a report that was widely publicised. It is reassuring to know that you will consider "all submissions" as many citizens have gone to considerable trouble amidst busy lives in the short time available to address the issues.

I would expect that it would take a considerable amount of time to rigorously assess all the submissions and carefully consider the issues raised. I suggest that as part of your assessment you make good the failure of the Social Impact Assessment to consult with residents in affected suburbs. I find it alarming that public dollars have been spent on a social impact assessment that consisted of a a desktop review and some consultation with Ashfield Councils, other Councils and some organisations in 2014 on a different route, plus a few questions to organisations sent via Westconnex communications staff in 2015. In 2015 Ashfield Council was not consulted at all and there were no direct communications by the consultant with residents affected.

Thank you for the offer from Mr Gainsford to publish my letter as a response. You have my consent. Although it will not be necessary as I can upload it as a response myself along with this letter.

Yours sincerely,

Wendy Bacon

The planning staff all seem like reasonable people on the phone but nevertheless their decisions do not seem reasonable. They are treating the public very shabbily. I'd still like to know – who actually made this decision not to grant an extension – the Premier Mike Baird, the Minister for Planning Rob Stokes, the Minister for Roads Duncan Gay or the head of the Sydney Motorway Corporation – Dennis Cliche? Why the rush – because the contracts were let before the planning process?

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- The DP&E website: http://majorprojects.planning.nsw.gov.au/ (http://majorprojects.planning.nsw.gov.au/)
- At selected local council offices and libraries in the Auburn, Strathfield, Canada Bay, Burwood and Ashfield local government areas
- At selected Roads and Maritime offices
- At various staffed displays in the region, as advertised in local media
- Via the WestConnex website: http://www.westconnex.com.au (http://www.westconnex.com.au).

WDA will continue conducting community information sessions. A project information line (1300 660 248) will also be available throughout the exhibition period to answer enquiries relating to the project.

Feedback on the project during the exhibition period should be made via a written submission to the Secretary of DP&E, quoting the project number (SSI 6307). All submissions received will be placed on the DP&E website.

Written submissions may be made online at http://majorprojects.planning.nsw.gov.au (http://majorprojects.planning.nsw.gov.au) or directed to:

```
SSI 6307
NSW Department of Planning and Environment
GPO Box 39
Sydney NSW 2001
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One thought on "**Executive summary: WestConnex M4 East Environmental Impact Statement**"

1. **wendybaconblog** says:
   25/09/2015 at 9:34 pm Edit

   This is just a short comment on the executive summary of the EIS for the M4 tunnel. The whole EIS is more than 4800 pages long but although this is only a summary, it reveals some of the key weaknesses of the whole assessment process.

   These are some preliminary points that come to mind. Putting my thoughts together provides a starting point for my submission which I hope to share with many others. If you would like to share ideas or add comments leave them on this site or contact me at [redacted]

   The first point of my submission will be that I will be **objecting** to the whole Westconnex project. I'm strongly opposed to any method of planning in which a company – in this case CIMIC -is given a 2 billion contract before the EIS was even lodged. I've read no evidence

that convinces me that 33 kilometres of tollway will solve Sydney's traffic problems, indeed Westconnex might make it worse for residents in many parts of Sydney, including in the West that for so long has been deprived of public transport.

Of course, the issues raised in these preliminary comments will later be checked for fairness or verified in the chapter for the topic and the appendices of the consultants' reports.

The main point that struck me on my initial reading is that the positive benefits of the project are claimed for the **whole** Westconnex project including some other projects such as the Southern extension (tollroad up from the Southern Suburbs to Arnciiffe) which are not even part of the Westconnex project at all. On the other hand, the negative impacts are only discussed in relation to this part of the project, the M4 tunnel between Homebush and Haberfield.

There is **NO** explanation for why this transparently biased approach is taken.

We read about claims of economic advantage and jobs generated by the Westconnex. No doubt jobs could be created but could they have been created for some other more useful project? We are expected to accept all the positive claims at face value but when it comes to the negative impacts, the approach is quite different. For example, we read that about 200 homes would be destroyed for the Westconnex M4 tunnel alone. However we are not told how many homes would be destroyed along the whole Westconnex routes. The same goes for businesses and vegetation. There is no cumulative accounting of the ecological, social of financials costs of the whole Westconnex. Even the negative local impacts of this M4 part of the project, that will seriously impact on thousands of citizens, are glossed over.

It's disturbing that the EIS has been managed and to a large extent produced by Aecom (http://www.wendybacon.com/2015/westconnex-eis-company-is-heavily-involved-in-pushing-motorway-forward/) which has other interests in the Westconnex project from conception to construction.Its Sydney branch had been naively promoting the Westconnex on its website since last year. The international engineering design and construction company which is listed on the New York Stock Exchange paid more than $200 million dollars for a settlement (http://www.wsj.com/articles/aecom-unit-pays-us-201-million-to-settle-australia-toll-road-lawsuit-1442826365) of a case in which it was sued for negligent traffic predictions for the Rivercity tollway project. A spokesperson for AECOM told the Wall Street Journal last week that the company isn't doing traffic predictions anymore but isn't that part of what it's doing for Westconnex? Why would the community rely on this company for its traffic predictions? Of course,none of this embarrassing matter is discussed or even referred to in the EIS. The Baird's government's recklessness in handling $15.4 billion of public money is breathtaking.

There are a lot of vague references to additional public transport options that will be provided along the route. For example, there is mention of two bus lanes that would operate along Parramatta Road when the M4 tunnel opens. However at an EIS exhibition session that I attended recently I was told that these lanes would NOT open at the beginning of operation. The effect of the buslanes will be to force/encourage drivers onto the tollway but as one WDA person said " people can't take too much change at once." They also said that the buslanes would require new infrastructure such as crossings to be installed. So since the bus lanes are outside the scope of this project, none of these problems are discussed although this promise would appear to be key to the claim that traffic would

go through the tolled tunnel rather than Parramatta Road. Contrast this to the way destructive Westconnex impacts are treated. For instance, the dislocation of communities in Homebush and Haberfield is passed over as a temporary impact. There is no appreciation of the cost either emotional and financial of uprooting households and forcing them to reestablish homes elsewhere. The impact of what could happen to people along the route whether they are homeowners, renters or businesses is glossed over as a minor problem that would be 'mitigated' to the extent that it is possible.

In the 'Alternatives' section, there is mention of public transport not providing 'point to point' access to workplaces and homes. Often a mixture of public transport and walking or cycling is at least as efficient as travelling by case. A tollroad does not take you 'point to point' either unless you are unlucky enough to live or work on the perimeter of one. In fact once you come off the toll road you are likely to be stuck in an even worse traffic jam than before as the history of tollroads shows that they do not solve traffic congestion.

As for air quality, the executive summary makes it sound like there is nothing to worry about. There is no mention of the health impacts of encouraging drivers commuting across Sydney to sit in their cars for hours a day. Some negative air quality impacts are acknowledged but they tend to be smoothly passed over or masked by bureaucratic language. We need to research the data provided to discover the location of 'receptors' for whom air quality will deteriorate and draw on up-to-date international research on air quality.

Also the EIS authors claim that air quality will not deteriorate at the tunnel exits because emissions will be blown back down the tunnel by fans and released through the unfiltered ventilation stacks. But what about 200 metres away beyond the portals where drivers find themselves in a bottleneck as traffic flow slows down? The air quality claims in the EIS need to be rigorously tested by a range of experts. At the end of the day, if the traffic estimates are wrong, most of the other EIS predictions will be wrong as well.

There are many other parts of the executive summary that beg for closer examination. I hope to do more reading and posting of comments soon. Do you have more information or ideas about any of these points? Are I wrong on some of them? What do you think?

One of the objects of Westconnex is to "protect natural and cultural resources and enhance the environment." They are easy words to write.

In that context you would surely need clear objective evidence that traffic congestion would be hugely better before knocking down neighbourhoods, subjecting communities to unhealthy noise stress, building non-filtered ventilation stacks near schools, destroying heritage buildings and hectares of vegetation? Instead we read that "modelling outputs suggest that the project would create average travel time savings of between six and eight minutes in 2021 on strategic routes between Western Sydney and the CBD." Now that doesn't seem enough to justify the permanent destruction of communities, foregone opportunities for other more worthwhile projects and the years of construction impacts including noise, vibration, dust,traffic congestion and millions of extra diesel trucks trips over our roads. Wouldn't we be better off if we could drive to a 'park and ride' car park or walk to get a train that we could rely on to arrive frequently and on time? Is that too much for residents of Sydney to expect?

Many would argue that rather than protecting “natural and cultural resources and enhance the environment”, this project will achieve the opposite. A fair planning assessment would reject the project or at least call a halt until a serious independent inquiry could be undertaken. The original idea of an EIS was for projects to be scrutinised by independent scientific analysis but in this and many other cases, the planning process has been subverted by vested interests.

Reply (http://m4eis.org/2015/09/18/executive-summary-westconnex-m4-east-environmental-impact-statement/?replytocom=44#respond)

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If you are required under section 147(3) of the Environmental Planning and Assessment Act 1979 *to disclose any political donations (see Page 1 for details), please fill in this form and sign below.*

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Name of person making this disclosure: WENDY BACON

Planning application reference (e.g. DA number, planning application title or reference, property address or other description): 14 – 6788 MS.

Your interest in the planning application (circle relevant option below)

You are the APPLICANT **YES** / (**NO**) OR You are a PERSON MAKING A SUBMISSION IN RELATION TO AN APPLICATION (**YES**) / **NO**

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Wendy Bacon.	"	NSW Greens.	29/1/15	100

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By signing below, I/we hereby declare that all information contained within this statement is accurate at the time of signing.

Signature(s) and Date: Wendy Bacon. 29/1/2016.

Name(s): WENDY BACON.

Cont

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Wendy Bacon.	"	NSW Greens	24/3/2015	500
Wendy Bacon	"	"	17/2/2015	100
Wendy Bacon	"	"	5/1/2015	50
Wendy Bacon.	"	"	29/12/2015	100

[redacted]

From: wendy bacon [redacted]>
Sent: Tuesday, 13 October 2015 4:03 PM
To: Brent Devine
Subject: Urgent request for extension of time for M4EIS exhibition and submission

Dear Brent,

Thank you for speaking with me this morning. The point of my call was to express my concern about the lack of time granted to the community to respond to nearly 5000 pages of EIS. Originally the community was only given 45 days, although the community affected by the Northconnex was given 60 days. This seemed unfair and disproportionate given the difference between the projects. The period was extended after Westconnex failed to properly file their documents.

This is a huge EIS report and its social impacts are complex and affect thousands of people and a number of communities. It is hard to think of an urban project that could have more impact than the Westconnex series of tollways. On the other hand, the EIS documents are not easy to absorb or to handle. There is much repetition and the actual analysis is often hard for the public to identify. I have found that important material is in the appendices so one cannot rely on summary chapters. The task is not made any easier by the lack of page numbers in some sections. PDFs are also difficult to deal with, especially when one is trying to check similar material in different technical reports.

My greatest concern is that a number of serious technical issues have arisen which could affect the health and safety of communities that many feel require independent advice. Given that the communities have very limited resources, it is necessary to seek advice from volunteer qualified advisors who can only address these issues out of hours. With only 20 days to go, these issues cannot be dealt with adequately by the community. Even Councils are stretched to respond. I am particularly concerned about this because I was told by a consultant at the EIS session in Strathfield last Saturday that she did not consult with Ashfield Council on the actual route of the project. Businesses were also not consulted directly. This means that this is the first and perhaps only chance that communities have a chance to respond to the EIS on the actual route which is quite different from that originally proposed.

If the law allowed for hearings or even merit review, the time restrictions might not worry me as much or seem so unjust. However given the amount of public money at stake and the risks to health, safety and the future mobility of residents and visitors to our city, it would seem to be foolish not to allow the more adequate period of at least three months for consultation.

Please acknowledge receipt of this email. There are many community complaints about Westconnex's poor approach to community consultation. Now residents and groups tell me that they are worried that they will not be able to get their submissions done in time. I trust you will respond very soon as time is running out.

Yours sincerely,

Wendy Bacon

Wendy Bacon
Journalist and Researcher
Australian Centre for Independent Journalism
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