I object to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: PETER CRUTCHLEY

Signature:

Please include my personal information when publishing this submission to your website

Declaration : I HAVE NOT made any reportable political donations in the last 2 years.

Address: 60 TARY ST

Suburb: ROZELLE Postcode: 2039

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

- The EIS states that traffic congestion around the St Peters Interchange is expected to be worse after completion of the M5 and the M4-M5 Link particularly in the evening peak hour. The EIS admits that this will have a "moderate negative" impact on the neighbourhood in increasing pollution (also admitted separately) therefore in health impacts, on safety for foot and cycle traffic but also for vehicles and on the local amenity.

- The Darley Road site will not be returned after the project, with a substantial portion permanently housing a Motorways Operations facility which involves a substation and water treatment plant. This means that the residents will not be able to directly access the North Light rail Station from Darley Road but will have to traverse Canal Road and use the narrow path from the side. In addition the presence of this facility reduces the utility of this vital land which could be turned into a community facility. Over the past 12 months community representatives were repeatedly told that the land would be returned and this has not occurred. We also object to the location of this type of infrastructure in a neighbourhood setting.

- It is clear from the EIS that spoil truck movements will not be confined to the City West link. At a community consultation it was revealed that trucks removing spoil at Camperdown would very likely be travelling from the James Craig Rd area and in that case would be using the additional lane on the Crescent and then turning right up Johnston St. This is totally CONTRARY to what concerned residents had been promised would not happen. It is clear that any assurances given to the community in past consultations are totally disregarded without consultation later. This is unacceptable.

- I am concerned that SMC has selected one of Sydney's most dangerous traffic spots, Darley Rd in Leichhardt for a construction site that will bring hundreds of extra trucks and cars into the area on a daily basis for years.

- The latest EIS was released just ten business days after feedback period ended for the Concept Design for the M4/M5 and before preliminary drilling to establish a route through the Inner West is completed. WHAT IS THE RUSH? This EIS is little more than a concept design and is far less developed than earlier ones. It is composed of many indicate only plans such that it is impossible to know what the impacts will be and yet approval is being sought in a rush. The EIS ignores more than 1500 submissions, including one of 142 pages from the Inner West Council.

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: PETER CRITCHLEY
	Address: 60 TERRY ST
Application Number: SSI 7485	Suburb: ROZELLE Postcode 2039
Application Name: WestConnex M4-M5 Link	Signature:

Please include my personal information when publishing this submission to your website.
***Declaration:** I **HAVE NOT** made any reportable political donations in the last 2 years.*

I object to the whole of the WestConnex Project, and the specific WestConnex M4-M5 Link proposals as contained in the EIS application, for the following reasons, and request the Minister reject the application.

- The increased amount of traffic the M4-M5 Link will dump on the roads to and from the St Peters, Haberfield and Rozelle Interchanges will disrupt local transport networks including bus and active transport (walking and cycling)

- There are overlaps in the construction periods of the New M5 and M4 of up to one year. This will significantly worsen impacts for residents close to construction areas. No additional mitigation or any compensation is offered for residents for these periods.(Executive Summary xxvii). It is unacceptable that residents should have these prolonged periods of exposure to more than one project. The EIS makes no attempt to measure or mitigate the cumulative impact of these prolonged periods of construction noise exposure.

- Out of hours work - Pyrmont Bridge Road site - Up to 14 'receivers' at this site are predicted to have impacts from high noise impacts during out of hours work for construction and pavement works for approximately 2 weeks caused by the use of a rock-breaker. Again, no plans to relocate or compensate residents affected is provided in the EIS (EIS, XV) The only mitigation contained in the EIS is that the use of the road profiler is to be limited during out of hours works 'where feasible.' (Table 5-120) In other words, there is no mitigation whatsoever for residents affected by daytime noise and a possibility that they will be similarly affected out of hours where the contractor considers that it isn't feasible to limit the use of the road profiler. This represents an inadequate response to managing these severe noise impacts for residents.

- Targets for renewable energy and offsets are unclear

- Noise from trucks entering and exiting the site - Pyrmont Bridge Road site - The EIS states that there will be noise 'exceedances' for trucks entering and exiting the site (Table 5-120) No detail is provided as to the level of any such 'exceedance'. Nor does it propose any mitigation other than investigations into 'locations' where hoarding above 2 metres can be utilized to control trucks in the queuing area. This does not result in any firm plans to manage the noise. Nor is enough detail provided so that those affected can comment on the effectiveness of this proposed mitigation measure

- Increased traffic on Bridge Road, Wattle Street and the Western Distributor will reduce the amenity and value of the investment in the renewal of the Fish Markets and renewal of the Bays Market District

- Despite the promise of the WestConnex business case, Parramatta Road remains a barrier to urban revitalisation. There is no discussion of this commitment in the EIS.

- The EIS states that the risk of ground settlement is lessened where tunnelling is more that 35m (EIS Vol 2B App E p1). Yet the depths of tunnelling in

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: PETER CRUTCHLEY Address: 6 TERRY ST
Application Number: SSI 7485	Suburb: ROZELLE Postcode 2039
Application Name: WestConnex M4-M5 Link	Signature:

Please include my personal information when publishing this submission to your website
Declaration: I HAVE NOT made any reportable political donations in the last 2 years.

I object to the whole of the WestConnex Project, and the specific WestConnex M4-M5 Link proposals as contained in the EIS application, for the following reasons, and request the Minister reject the application.

- The WestConnex program of works has been described as an integrated transport network solution. However, the role and interdependency with public transport and freight rail is not considered. The recent Government commitment to a Metro West requires a rethink on the need for WestConnex. Particularly as the WestConnex business case outlines a mode shift from public transport to the toll road as a benefit required to justify it economically.

- While WestConnex might integrate with the wider motorway network, no evidence is provided demonstrating that it integrates with the wider road network – let alone the broader transport and land use system. For example the EIS provides no information about changes in traffic volumes entering the Sydney CBD caused by WestConnex. RMS has only just commenced work to identify which roads fanning out from WestConnex portals will need to be upgraded to deliver large numbers of vehicles to and from the project. It is thereformpossible to form a properly informed understanding of the environmental impacts – the very purpose of the EIS.

- The EIS states that the project will improve connection to the Sydney Airport and Port Botany. It will not. The Premier herself has said that the Sydney Gateway does not form part of the WestConnex project. Without the Sydney Gateway, connections between WestConnex (St Peters Interchange) and Sydney Airport and Port Botany will be via congested surface roads in Botany and Mascot. As the connection is unresolved, it is impossible to determine the effect on demand of the unknown pricing regime that will apply to the Sydney Gateway, nor how much travel time will be incurred – which might actually negate the already marginal proposed travel time savings.

- It is quite clear to me that insufficient research has been done on the archeology of the Rozelle Railway yards. This could be a valuable archeology site. Why has an EIS been put forward without the necessary research being done to further identify potential remains? No project should be approved on the basis of such an inadequate level of research.

- Ambient air quality - There is no evidence provided in the EIS that the ventilation outlets will be date. The EIS simply states that 'the ventilation outlets would be designed to effectively disperse the emissions from the tunnel and are predicted to have negligible effect on local air quality (xiv, Executive Summary). This is inadequate and details of the impacts on air quality need to be provided so that the residents and experts can meaningfully comment on the impact.

Attention Director
Application Number: SSI 7485

Infrastructure Projects, Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Application Name:
WestConnex M4-M5 Link

Name: PETER CRUTCHLEY

Signature:

Please include my personal information when publishing this submission to your website.
I HAVE NOT made reportable political donations in the last 2 years.

Address: 60 TERRY ST

Suburb: ROZELLE Postcode 2039

I object to the WestConnex M4-M5 Link proposals for the following reasons, and request the Minister reject the application, and require SMC and RMC to prepare a new EIS that is based on genuine, not indicative, design parameters, costings, and business case.

- The EIS identifies hundreds of risks at different construction sites. It relation to these risks the EIS recommends proceeding despite the risks; or seeking a way to mitigate risks during the "detailed design" phase. That phase excludes the public altogether. That is, the M4/M5 should be approved with no calculation of risks or what mitigation may mean for impacted residents.

- I am concerned that the AECOM, the company responsible for the EIS, always approves knocking down heritage buildings if the project requires it. It doesn't how much value it holds for the community, it must always be destroyed.

- The proposal for a permanent water treatment plant and substation to the south of the site on Darley Road will prevent direct pedestrian access to the light rail station. It will affect the future uses of the site once the project is completed. The facility is out of step with the area which is comprised of low rise homes and detracts from the visual amenity of the area. This site is a pedestrian hub and will be a visual blight for pedestrians, bike users and the homes that have direct line of sight to the facility. It should not be permitted on this site.

- Table 6.1 in Appendix Q (Social and Economic impact) is not an accurate report on the concerns of residents. It downplays concerns of Newtown, St Peters and Haberfield residents. It does not even mention concerns about additional years of construction in Haberfield and St Peters. The raises the question of whether this is a result of the failure of SMC to notify impacted residents including those on the Eastern Side of King Street and St Peters about the potential impacts of the M4 M5

- Many homes around the Rozelle Rail Yards and the Crescent Civil site will be noise affected, some will be highly noise affected. The expected duration of the cumulative works is 120 weeks, almost 3 years, when noise impact will be significant so it is essential that maximum noise mitigation measures are put in place. However the EIS contains only vague details of how mitigation will be carried out. There is no requirement that measures will in fact be carried out to address noise impacts. The approval conditions need to contain specific noise mitigation measures, that can be mandated and enforced. Areas that will be particularly highly noise affected are Bayview Crescent and Railway Parade, the Northern end of Rail Yard site and sections of Lilyfield Rd, Hornsey St, Quirk St and Robert St. Given their proximity, receivers located along Lilyfield Rd between Victoria Road and Gordon St which overlook the Rozelle Yards are likely to experience the greatest construction noise impact within the whole Rozelle area.

Submission from:	Submission to:
Name: Karen Atkinson Signature: K Atkinson *Please **include** my personal information when publishing this submission to your website* ***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.* Address: 7 TROUTON ST Suburb: BALMAIN Postcode 2041	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001 Attn: Director – Transport Assessments Application Number: SSI 7485 Application Application Name: WestConnex M4-M5 Link

I submit this objection to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the following reasons, **and ask that the Minister reject the application.**

A. There are overlaps in the construction periods of the New M5 and M4 of up to one year. This will significantly worsen impacts for residents close to construction areas. No additional mitigation or any compensation is offered for residents for these periods.(Executive Summary xxvii). It is unacceptable that residents should have these prolonged periods of exposure to more than one project. The EIS makes no attempt to measure or mitigate the cumulative impact of these prolonged periods of construction noise exposure.

B. Rozelle Rail Yards and Rozelle Civil Site.It is clear that the most highly affected area of Stage 3 will be the Rozelle area and the massive and hugely complex Rozelle interchange. The suggestion that Westconnex is capable of building this is highly questionable. Nothing like this has been built anywhere else in the World. Considering the simple problems of dust management, noxious gasses and the handling of toxic materials like asbestos that have been so inappropriately dealt with on Stages 1 and 2 by Westconnex this intersection of Stage 3 is a disaster waiting to happen and should definitely not be allowed to proceed without a massive investigation. What has been shown in the EIS is totally inadequate for this project to be allowed to proceed.

C. The tunnels under Rozelle/Lilyfield are going to be in three levels. The EIS does not explain what safety procedures are being built into the project to deal with situations like serious congestion, accidents or fire. With a serious hold up on the deepest of these tunnels it is clear that the air quality will very quickly become toxic unless substantial air conditioning is a major part of the design. There is no in depth detail about how these issues are going to be addressed. This is not acceptable.

D. Vegetation: Leichhardt. The mature trees on the Darley Road site should be preserved. If any trees are removed during construction it should be a condition of approval that they are replaced with mature trees.

E. Insufficient time has been given for the community to prepare submissions to the EIS, especially when one considers that whole neighbourhoods affected by the project were not even notified during the concept design period. e.g Newtown, east of King St.

F. 1.1599 residences or thousands of residents would have noise levels in the evening sufficient to cause sleep disturbance. The technical paper in EIS acknowledges that this is the case, even allowing for acoustic sheds and noise walls. Sleep disturbance has health risks including heightened stress levels and risk of developing dementia. This is simply not acceptable.

NSW Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

https://westconnexactiongroup.good.do/makeyoursubmissiontothewestconnexm4m5eis/Submission-to-WestConnex-New-M4M5/

EIS Submission for WestConnex M4-M5 Link (Application Number SSI 16_7485)

Thank you for the opportunity to submit on the EIS for WestConnex M4-M5 Link. I oppose the project and outline my major concerns below, especially those related to Rozelle Public School (the School) as a sensitive receptor.

Air pollution caused by the ventilation shafts

WestConnex plans unfiltered tunnel ventilation shafts of undetermined heights: one approximately 200m northwest and three others about 600m south of the School. There is not enough detail or evidence of analysis at the moment to enable me to determine the impact to the children at the School. Please provide the following:

- An analysis of current traffic volumes at 9am, noon and 3pm on Victoria Road adjacent to the school, and projected traffic analysis for school days both on Victoria Road adjacent to the School, and for both a tolled and toll-free Iron Cove Link tunnel adjacent to the School, at 9am, noon and 3pm, by diesel and non-diesel engine type,
- Evidence of current air pollution levels at the School from 9am, noon and 3pm for all school days in the past year, and the projected levels of air pollution at the School post-construction at 9am, noon and 3pm on day one, year one, year five and year ten, including carcinogenic diesel particulates, PM 2.5 particulates, and any other relevant measurement,
- Details of the prevailing wind and other relevant weather conditions at the School for each day in the past year,
- The final design of the 4 ventilation shafts proposed for Rozelle, including the height, diameter, façade and exact location, and a commitment that all ventilation shafts in Rozelle will be filtered for PM2.5,

Impacts of construction

Four to five years of construction works is planned, including work at Wellington Street which is adjacent to the School, constructing the Iron Cove Link tunnel portals on Victoria Road about 250m from the School, with tunnelling work (and activities to support tunnelling) scheduled for 24 hours a day, seven days a week.

I am very concerned that this will mean our children (as well as local residents) will be negatively impacted in some way by worsened air quality, loud noise and untenable vibration during this time - potentially the rest of their entire primary school education - during the entire time that our children are present on school grounds or at home and for a significant part of their lives.

Please provide a construction plan to include specific commitments and plans to:

- Minimise the short-term and long-term impact of construction children's physical and mental health, brain development, stress levels, sleep and naps, and the impact on those with pre-existing lung and heart conditions,

Impacts to physical and mental health after construction

- Identify and mitigate all short-term and long-term impacts of prolonged exposure to all known air pollutants associated with traffic on sensitive receptors as those identified in Appendix K figure 6-4 are insufficient.

Road user and pedestrian safety during construction and operation

There isn't enough traffic management detail to ensure the safety for the children at the School both during construction and operation. Please provide the following:

- A traffic risk mitigation plan concerning all roads and footpaths within 500m of the construction area, including but not limited to Victoria Road, Wellington Street, Merton Street and Darling Street for road users and pedestrians, including buses, pedestrians and cyclists during construction due to temporary road arrangements or the closeness of construction activities to normal traffic,
- Details of traffic modelling concerning all roads and footpaths within 500m of the construction area, including but not limited to Victoria Road, Wellington Street, Merton Street and Darling Street which minimises risks to safety for road users, including buses, pedestrians and cyclists during operation whilst the Iron Cove Link is toll-free, and if the Iron Cove Link is tolled in future, including any possible rat runs created by toll-avoiding road users,
- A traffic plan to maximise our children's health and safety and ability to walk to and participate in important School events, such as the School cross country and athletics carnival, normally held at King George's Park, and the School swim carnival at Drummoyne pool,
- Details of the impacts on bus routes and stops, and cycle paths and footpaths within 500m of construction, including but not limited to Victoria Road during construction and operation,
- Details on access to King George's Park and the Bay Run by road users, cyclists and pedestrians during construction and operation.

Other major concerns I have include:

I am concerned about the impact the noise and dust will have on future health of the community and individuals.

For the sake of our community, our families, and our children, I hope you will be able to consider and address these important concerns.

Yours Sincerely,

Signature:

I allow / do not allow for my personal details to be published.

I have not made a reportable political donation over $1000 in the past 2 years.

Name: Xavier Atkinson
Address: 7 TROUTON ST, BALMAIN NSW 2041
Email: xjatkinson@gmail.com

Submission from: JASINTA DECORIE Name: JASINTA DECORIE Signature: *Please **include** my personal information when publishing this submission to your website* ***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.* Address: 276 DARLING ST Suburb: BALMAIN Postcode: 2041	Submission to: Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001 Attn: Director – Transport Assessments Application Number: SSI 7485 Application Application Name: WestConnex M4-M5 Link

I submit my objection to the WestConnex M4-M5 Link as contained in the EIS application # SSI 7485, for the following reasons, **and ask that the Minister reject the application and require preparation of a genuine, not indicative, EIS**

- Because this is still based on a "concept design" it is unknown how the communities affected will not know what is being done below their residences, schools, business premises and public spaces, particularly if the whole project is sold into a private corporation's ownership before the actual designs and construction plans are determined. The EIS makes references to these designs and plans being reviewed but there is **NO** information as to what agency will be responsible for such reviews or whether the outcomes of such reviews will be made public. The communities below whose homes, business premises, public buildings and public spaces this massive project will be excavated and built will be completely in the dark about what is being done, what standards it is supposed to comply with, what inspection or scrutiny it will subject to, and whether the private corporations undertaking the work will be held to any liability by our government.

- The EIS permits trucks to access local roads in exceptional circumstances which includes queuing at the site. Given the constraints of the Darley Road site queuing will be the usual situation. The EIS needs to be amended to remove queuing as an exceptional circumstance. The truck movements should properly managed by the contractor so that there is no queuing. This exception will make it easier for contractors to neglect their obligation to monitor and manage truck movements in and out of the site and needs to be removed. The EIS needs to specifically mention all local streets abutting Darley Road and expressly prohibited truck movements (including parking) on these streets. This should include all streets from the north (James St) to the south (Falls Road), which are near the project footprint.

- Streets in Haberfield would be subject to heavy vehicle traffic for a further four years, making at least 7 years of heavy impacts on a single suburb. The answer is not a 'community strategy'. Residents who believed that their pain would be over after the M4 east are now being asked to sustain a further four years of impacts. No compensation or serious mitigation is suggested.

- The EIS states that investigation would be undertaken to confirm whether the Victoria Road bridge is a potential roost site for microbats. There will be attempts to 'manage potential impacts' if confirmed. This is inadequate. The project should not be permitted to impact on vulnerable species.

- I do not accept the finding in the Appendix P that there will be no noise exceedences during construction at Campbell Rd St Peters. There has been terrible noise during the early construction of the New M5. Why would this stop, especially given the construction is just as close to houses? Is it because the noise is already so bad that comparatively it will not be that much worse. This casts doubt on the whole noise study.

I object to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: KATE ROBERTS

Signature:

*Please **include** my personal information when publishing this submission to your website*
***Declaration**: I **HAVE NOT** made any reportable political donations in the last 2 years.*

Address: 9 GEORGE ST

Suburb: BALMAIN Postcode 2041

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

- The Rozelle interchange has an unprecedented concentration of stacks, in a valley, adjacent to densely populated suburbs. The interchange has steep and long climbs, increasing emissions concentrations, which will then be pumped into the surrounding area. The modelling does not account for stop-start conditions. However, the EIS shows significant traffic volumes heading onto the Anzac Bridge, which already operates at the lowest Level of Service (F) in peak times. There will be significant queues heading into the tunnels, greatly increasing the level of emissions. The existing M5 in peak conditions may provide a more realistic base line.

- The EIS states that the impact on regional air quality is minimal and thus concludes that the project's impact on ozone is negligible. Ozone is a major pollutant and Western Sydney, Campbelltown in particular, suffers the worst ozone pollution. Major components of ozone are generated in eastern Sydney and drift west. Previous environment departments have spoken about the need for an eight-hour standard concentration and goal for ozone (DECCEW, 2010, State of Knowledge: Ozone). OEH needs to provide information about the value of this standard and on the impact of new motorways on that level.

- In view of the above no tunnelling less than 35m in depth from the surface to the crown of a tunnel (ie the top) under residences should be contemplated let alone undertaken. And of course no tunnelling should be undertaken under sensitive sites.

- The EIS (App H, p.269) refers to the RMS plans to carry out "network integration" works surrounding the Rozelle interchange once the project is complete but offers little detail of the nature of the works. It mentions the intersection of the Western Distributor and Pyrmont Bridge Road at Pyrmont, Western Distributor near Darling Harbour and a review of kerbside uses near Western Distributor, The Crescent, Johnston Street and Ross Street.

- The analysis shows Anzac Bridge/Western Distributor is currently at or close to capacity, particularly in the AM peak where existing operational and geometric features of the road network limit the capacity. The EIS notes that under all scenarios the Project will generate significant additional traffic on these links, requiring major and costly additional motorway infrastructure to the CBD. This is despite the fact that the NSW Government recognises that there is no capacity to accommodate additional car trips to the CBD and all its policies aim to allocate more street space to public transport, walking and cycling. The EIS must assess and identify any upgrades that the Project will cause or require. (App H p. xxxiii)

I object to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: KATE ROBERTS

Signature: [signature]

*Please **Include** my personal information when publishing this submission to your website*
***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.*

Address: 9 GEORGE ST

Suburb: BALMAIN Postcode 2041

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

- Given that the modelling for air quality is based on the traffic modelling, which, as shown above, is fundamentally flawed, and given poor air quality has a significant health impact the EIS should not be approved until an independent scientifically qualified reviewer has analysed the stated air quality outcomes and identified any deficits

- Significant declines in pollutants are due to improvements to in-vehicle technology and fuel. However, plans to improve standards for heavy vehicles, which disproportionately contribute to NOx emissions and thus ozone, appear to have stalled. The proponent needs to provide a scenario that sets out impacts due to delays in adopting improved emission standards.

- Part 3 of the Secretary's Environmental Assessment Requirements requires assessment of the likely risks of the project to public safety, paying particular attention to pedestrian safety. This is not addressed in Chapter 8.

- The EIS admits that the people who live in western Sydney have lower incomes than in the inner suburbs and that the tolls will therefore be a heavier cost in Emu Plains, Penrith, Mt Druitt, Blacktown or Wetherill Park than in Strathfield or Padstow. This is unfair when the benefits of Stage 3 are all for north-south connections to the northern beaches or the proposed new harbour tunnel.

- The original objectives of the project specified improving road and freight access to Sydney Airport and to Port Botany. We now have the proposals for Stages 1,2 and 3 and they don't even go to Port Botany or Sydney Airport. We are being asked to support Stage 3 of WestConnex on the basis of more major unfunded projects that are barely sketches on a map.

- The EIS provides traffic projections for the 'With Project' scenario and 'cumulative' scenario (which in addition to links in the 'With Project' scenario includes the Beaches Link and F6 motorway connections), but when referencing the traffic benefits/impacts in the early sections, the EIS appears to cite the 'with project' scenario rather than Cumulative Scenario. It is unclear which scenarios the Business Case best reflects.

- We know the state government intends to sell the project, both the constructing and the operation. I object to the privatization of the road system. There is no guarantee of protecting the public interest in an efficient transport system when so much of it operates to make a profit for shareholders.

- The modelling makes no mention of bus lanes on Victoria Rd. If these lanes were not modelled as car lanes the assumed capacity of the road is incorrect.

- The modelling shows severe degradation to the City West Link if the Western Harbour Tunnel is connected.

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: KATE ROBERTS
	Address: 9 GEORGE ST.
Application Number: SSI 7485	Suburb: BALMAIN Postcode 2041
Application Name: WestConnex M4-M5 Link	Signature:

*Please **include** my personal information when publishing this submission to your website*
***Declaration**: I **HAVE NOT** made any reportable political donations in the last 2 years.*

I object to the whole of the WestConnex Project, and the specific WestConnex M4-M5 Link proposals as contained in the EIS application, for the following reasons, and request the Minister reject the application.

- The increased amount of traffic the M4-M5 Link will dump on the roads to and from the St Peters, Haberfield and Rozelle Interchanges will disrupt local transport networks including bus and active transport (walking and cycling)

- There are overlaps in the construction periods of the New M5 and M4 of up to one year. This will significantly worsen impacts for residents close to construction areas. No additional mitigation or any compensation is offered for residents for these periods.(Executive Summary xxvii). It is unacceptable that residents should have these prolonged periods of exposure to more than one project. The EIS makes no attempt to measure or mitigate the cumulative impact of these prolonged periods of construction noise exposure.

- Out of hours work - Pyrmont Bridge Road site - Up to 14 'receivers' at this site are predicted to have impacts from high noise impacts during out of hours work for construction and pavement works for approximately 2 weeks caused by the use of a rock-breaker. Again, no plans to relocate or compensate residents affected is provided in the EIS (EIS, XV) The only mitigation contained in the EIS is that the use of the road profiler is to be limited during out of hours works 'where feasible.' (Table 5-120) In other words, there is no mitigation whatsoever for residents affected by daytime noise and a possibility that they will be similarly affected out of hours where the contractor considers that it isn't feasible to limit the use of the road profiler. This represents an inadequate response to managing these severe noise impacts for residents.

- Targets for renewable energy and offsets are unclear

- Noise from trucks entering and exiting the site - Pyrmont Bridge Road site - The EIS states that there will be noise 'exceedances' for trucks entering and exiting the site (Table 5-120) No detail is provided as to the level of any such 'exceedance'. Nor does it propose any mitigation other than investigations into 'locations' where hoarding above 2 metres can be utilized to control trucks in the queuing area. This does not result in any firm plans to manage the noise. Nor is enough detail provided so that those affected can comment on the effectiveness of this proposed mitigation measure

- Increased traffic on Bridge Road, Wattle Street and the Western Distributor will reduce the amenity and value of the investment in the renewal of the Fish Markets and renewal of the Bays Market District

- Despite the promise of the WestConnex business case, Parramatta Road remains a barrier to urban revitalisation. There is no discussion of this commitment in the EIS.

I submit my strongest objections to the M4-M5 Link proposals as contained in the EIS application # SSI 7485, and request the Minister to reject the application and require SMC / RMS to issue a true, not an 'indicative' and fundamentally flawed EIS

Name: KATE ROBERTS

Signature:

*Please **include** my personal information when publishing this submission to your website*
***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.*

Address: 9 GEORGE ST,

Suburb: BALMAIN Postcode 2041

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name:
WestConnex M4-M5 Link

- The City West Link Eastbound AM and PM peak hour and other locations."Table 7-19 shows that several locations are forecast to exceed theoretical roadway capacity with the increased background traffic and the construction traffic in the 2021 AM and PM peak hours. However, traffic on the majority of these roads would exceed their theoretical capacity even without the construction traffic, simply due to the growth in background traffic". So in the full knowledge that this area will be at capacity in 2021, massive amounts of construction traffic are going to be added for the whole construction period of 5 years. Even on completion it is stated in the EIS that traffic will be worse in this area than 'without the project'. This categorically shows that the planning of Westconnex is totally inadequate and needs major changes. It also shows that when completed Westconnex will not work. It is abundantly obvious that Rail/Metro is the only option to radically overhaul Sydney's failed transport systems

- I am completely opposed to approving a project in which the Air quality experts recommend rather than filtrating stacks extra stacks could be added later.

- 2 G Appendix P Table 5-27 of the EIS states that 43% of the Leichhardt- Glebe Precinct travel to work by Car, 21% by Bus and 5%by Rail. These are figures for 2011. These figures are being used to promote the project and suggest they are accurate today. In the case of Rail these figures are extremely questionable. The Light Rail is now hugely popular, it's use having grown enormously. It is travelling at full capacity at Peak hours. More services are being put in place. Apartment blocks are being built as close to the Light Rail corridor as possible. Residents see the Light Rail as an efficient, reliable and timely method of commuting to work. It is blatantly obvious that the Govt should be investing heavily in building and extending Light Rail, Metro and Rail. If this were pursued in a professional manner the necessity for trying to hoodwink the community into believing that Westconnex were needed would be totally unnecessary.

- The EIS was prepared by global engineering firm AECOM, which also prepared the EIS for Stages 1 and 2. When he approved these earlier stages, the then Minister for Planning Rob Stokes pointed to conditions of approval that would minimise impacts on communities. But the impacts have turned out to worse than expected.

I object to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: Mark Cashmore

Signature:

*Please **include** my personal information when publishing this submission to your website*
***Declaration**: I **HAVE NOT** made any reportable political donations in the last 2 years.*

Address: 28/501 Glebe Point Road

Suburb: Glebe Postcode 2037

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

I. (6-51) The EIS needs to mandate that these measures are in place. Where mentioned, the acoustic shed that is considered offers the lower grade noise protection. This is despite the fact that 36 'sensitive receivers' are identified in the EIS, who will have extreme noise disturbance through much of the 5-year construction period. In addition, the acoustic shed covers only the spoil and spoil handling area and not the tunnel entrances and exits. The highest level of noise protection, which is only suggested in the EIS, needs to be mandated in the EIS. In addition, the shed needs to cover both the entrance and exit to the site and not simply the spoil handling areas. The independent engineer's report (commissioned by the Inner West council) states that it is likely, because of the elevated position of the site, that it is likely an acoustic shed will not contain the noise to an acceptable level. In addition, a temporary access tunnel will be built from the top of the site and run directly under homes in James Street. These homes will be unacceptably impacted by the construction noise and truck movements without these additional measures

II. I do not consider so many disruptions of pedestrian and cycle ways to be a 'temporary' impact. Four years in the life of a community is a long time. The EIS acknowledges that there will be more danger in the environment around construction sites. It is a serious matter to deliberately take steps to reduce the safety of a community, especially when as the traffic analysis shows there will be a legacy of traffic congestion even in 2033. A promise of a plan is NOT an answer to those concerned about the impacts.

III. The EIS states that these will occur near the Darley Road site. There is no detail provided, nor is there a process by which residents can influence such decisions. The Inner West Council's documents state that Darley Road is not built to normal road requirements and safety standards, as it was established as an access road for the former goods line. Two fatalities have occurred near the site location, with many accidents. The Council has been trying to make Darley Road a safer route for many years. Elwick Street North for example was partially closed as a result of a fatality. The approval conditions need to make it clear that all road closures need to be made in consultation with residents affected and that the safety issues are adequately addressed. No arterial traffic from Darley Road should be allowed to be diverted onto narrow local roads

IV. The proposed work hours for the Rozelle Rail Yards are tunnelling and spoil handling 24 hours a day seven days a week. Civil construction Mon - Fri 7.00am – 6.00pm, Sat 8.00am -1.00 pm. There will be no night work at The Crescent Civil Site and the daytime hours are stated to be the same as at the Rozelle Rail Yards. However as has been experienced by those at Haberfield and St Peters these hours and especially late and night work have been extended and implemented when the schedule has fallen behind and this has lead to physical and mental stress for many residents through interrupted sleep and loss of sleep especially with children. The roads and sites at night in the area will see a marked increase in noise from truck movements, truck reversing alarms and running machinery. It will also see a marked increase in light during the night hours with site illumination and vehicle head lights as has been experienced in other areas. These problems have not been properly addressed and are not adequately dealt with in the EIS.

Attention: Director, Infrastructure Projects, Planning Services Department of Planning and Environment, GPO Box 39, Sydney, NSW, 2001

Submission in relation to: Application Number - SSI 7485
Application name - WestConnex M4-M5 Link

Name:	Mark Cashmore
Address:	628 501 Glebe Point Rd Suburb GLEBE Post Code 2037
Please include my personal information when publishing this submission to your website	Yes / No
Declaration: I have not made any reportable political donations in the last 2 years.	
Signed:	Date 26-9-17

Impact of MOC1 on local area

I oppose the plan for a water treatment plant and an electrical substation to remain on the site of 7 Darley Rd Leichhardt after tunnel construction is complete.

This Motorway Operations Centre 1 (MOC1) is a completely inappropriate use of a site in a residential area with particular characteristics.

The character of Leichhardt is heavily influenced by the street pattern (predominantly north/south extending from Parramatta Road) and built form. The wide carriageways and regular street pattern combined with the topography and a predominance of single storey detached housing gives Leichhardt a more open character than that of Glebe or Annandale. The suburb is made up of several distinctive residential neighbourhoods including Excelsior Estate, Helsarmel, Piperston and West Leichhardt. The subject site is within the Helsarmel Distinctive Neighbourhood that is located on the northwest slope of the Leichhardt/Balmain ridge. The Helsarmel Distinctive Neighbourhood is predominated by low scale detached and semi-detached cottages that demonstrated a variety of architectural styles and building materials. Many of these dwellings are Federation or post-war styles, with scattered examples of Californian bungalows and workers cottages.

The desired future character as set out by Council is to maintain the character of the neighbourhood by keeping development complementary in architectural style, form and materials and preserve the low scale cottage character. The suburb profile allows for contemporary development that is complementary to the streetscape.

The MOC1 proposal for a tunnel water treatment plant and an electrical substation is inconsistent with the character of the neighbourhood. This is a residential neighbourhood and what is proposed will permanently degrade our neighbourhood. MOC1 will be a prominent and unwelcome eyesore.

The proponent should be required to abandon the Darley Road civil and tunnel site Leichhardt and the proposed Motorway Operations Centre 1. The proponent should identify alternatives locations for water treatment and a substation including at the alternative dive site locations. The proponent has not given an adequate explanation as to why these alternatives have not been included in the EIS.

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: Mabel Luft
	Address: 58A Osgathorpe Rd
Application Number: SSI 7485	Suburb: Gladesville Postcode 2111
Application Name: WestConnex M4-M5 Link	Signature:

Please include my personal information when publishing this submission to your website
Declaration: *I **HAVE NOT** made any reportable political donations in the last 2 years.*

I object to the whole of the WestConnex Project, and the specific WestConnex M4-M5 Link proposals as contained in the EIS application, for the following reasons, and request the Minister reject the application.

- The EIS states that the risk of ground settlement is lessened where tunnelling is more that 35m (EIS Vol 2B App E p1). Yet the depths of tunnelling in streets leading to and around the Inner West Interchange are astonishingly low, eg John St at 22m, Emma St at 24m, Hill St at 28m, Moore St 27m, Piper St 37m, (Vol 2B Appendix E Part 2), Catherine St at 28m (Vol 2B Appendix E Part 1) - homes would indisputably sustain damage or cracking at these depths.

- Given that the modelling for air quality is based on the traffic modelling, which, as shown above, is fundamentally flawed, and given poor air quality has a significant health impact the EIS should not be approved until an independent scientifically qualified reviewer has analysed the stated air quality outcomes and identified any deficits

- Concentrations of some pollutants $PM_{2.5}$ and PM_{10} are already near the current standard and in excess of proposed standards (p9-81, p9-93). It is critical to note that these particulates are a classified carcinogen and are known to have critical, and at times fatal, consequences if elevated. People living within 500 metres of heavily affected areas have demonstrably shorter lives, much higher incidences of chronic lung conditions and higher levels of cardiovascular diseases.

- I object to the whole WestConnex project and Stage 3, the M4-M5 Link in particular, because I object to paying high tolls to fund a road project that does not benefit Western Sydney.

- The EIS notes that an 'Operational Traffic Performance Review' will be undertaken at 12 months and five years after the M4-M5 Link is open to consider the need for "post-opening mitigation measures" (Page 223, Chapter 9.8, Appendix H). I object to this approach as it is contrary to the requirements of the EIS process and reflects a clear admission on the part of the NSW Government that:
  - ◊ It has no confidence in the traffic modelling process to predict to any reliable extent the likely impacts of the Project;
  - ◊ It is unable or unprepared to describe the true impacts of the Project on the people of NSW;
  - ◊ It has not considered or budgeted for the potentially significant additional roadworks required to address the impacts of the Project (or the need for road upgrades to feed toll-paying drivers to WestConnex.

- The modelling conclusions are internally inconsistent. There is an assumption that traffic would dissipate at the edge of the motorway with no negative impacts on the CBD, Mascot and Alexandria. However there is also an assumption that additional roads would be needed to cope with said traffic.

I object to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: Iqbal Latif

Signature:

*Please **include** my personal information when publishing this submission to your website*
***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.*

Address: 58A Osgathorpe Rd

Suburb: Gladesville Postcode 2111

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

- The high tolls are set to increase for decades by the CPI or by 4% a year, whichever is higher. When inflation is low and wages are not even keeping up with low inflation this is outrageous. And it is not as if the commuters or workers of western Sydney have a real alternative in public transport. This is just gouging western Sydney road users to make the road attractive to a buyer

- 602 homes and more than a thousand residents near Rozelle construction sites would be affected by noise sufficient to cause sleep disturbance even if acoustic sheds and noise walls are used..The EIS promises negotiation to provide even more mitigation on a one by one basis. This is not acceptable to me. As other projects have demonstrated, those with less bargaining power or social networks have been left more exposed. In any case, there is no certainty that additional measures would be taken or be effective.

- The EIS admits that drivers from lower income households are more likely to travel longer distances to avoid tolls because of the cost. So you either pay the high tolls (capped at $7.95 in 2015 dollars) or you drive for longer to avoid the tolls. We have seen this already where commuters have chose to drive on Parramatta rd not the new M4 with the new tolls. This is unfair.

- Whilst chapters 10 and 12 of Appendix H show mid-block level of service at interfaces with interchanges and points within the tunnels, there is no information about other mid-block points such as the ANZAC Bridge. Part 8.3.3 of the EIS refers to increases in daily traffic forecasts on the Anzac Bridge/Western Distributor, particularly in the AM peak, as traffic accesses the M4-M5 Link and future forms of traffic or network management are intended. Information about the traffic forecasts for the Anzac Bridge/Western Distributor should be provided.

- The 2023 'cumulative' modelling scenario includes the Sydney Gateway and the western harbour tunnel but neither of these projects are currently committed and it is highly unlikely they will be completed by this date. This raises the question of why did the proponent adopt such a misleading position and how does it affect the impacts stated?

- I object to the way this project is hailed by the Minister for Western Sydney Stuart Ayres for the benefit of western Sydney when hardly any parts of Sydney west of Parramatta are even mentioned in the EIS. This is deliberately misleading. All the reasons for this stage of WestConnex are about linking the new M4 and M5 to the western harbour tunnel and northern beaches tunnel. Or they talk about links to the "Sydney Gateway" to the airport and Port Botany and they are not even part of this project.

- This EIS contains no meaningful design and construction details and no parameters as to how broad changes and therefore impacts could be. It therefore fails to allow the community to be informed about and comment on the project impacts in a meaningful way.

Attention Director
Application Number: SSI 7485

Infrastructure Projects, Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001
Application Name:
WestConnex M4-M5 Link

Name: H. STACK

Signature: .....

Please include my personal information when publishing this submission to your website. I HAVE NOT made reportable political donations in the last 2 years.

Address: 61 HAMPTON ST

Suburb: CROYDON PARK *Postcode* 2133

I submit my objection to the WestConnex M4-M5 Link proposals for the reasons stated below, and request the Minister reject the application entirely, and cause the proponents to reissue an EIS that is based on a fully researched, developed, and budgeted concept design, and require the proponents to prepare a new business case against that design.

- *The EIS (including Appendix H) fails to provide traffic modelling outputs to assess impacts of the Project on CBD streets and intersections. Given the highly constrained and congested nature of the CBD, NSW Government policy focusses on reducing the number of cars in the CBD in favour of public transport, walking and cycling. The proponent should provide intersection performance results for the following intersections:*

  a) *The ANZAC Bridge off-ramp to Allen Street/Botany Road*
  b) *The Western Distributor off-ramp to Druitt Street (buses)*
  c) *The Western Distributor off-ramp to Bathurst Street*
  d) *The Western Distributor off-ramp to King Street/Sussex Street*
  e) *Gardeners Road and Botany Road*
  f) *All intersections within the modelled area in the Sydney CBD*

- *The traffic model used is an 'unconstrained' model. It assumes that all vehicles will travel on the route with the lowest "generalised cost" (i.e. combination of time and money). But it does not consider whether those routes have the capacity to handle all those vehicles. In the real world people change their time of travel, mode of travel and consider whether to make a trip at all to avoid congested routes. As a result travel patterns in the real world are very different to the patterns identified in models.*

- *Better use of existing road infrastructure has not been analysed as a feasible alternative. The EIS only refers to existing RMS programs. An analysis of urban road projects recommended in the State Infrastructure Strategy Update 2014 should be conducted as strategic alternatives including:*

  a) *Smart Motorways investments on the M4, the Warringah Freeway and Southern Cross Drive-General Holmes Drive*
  b) *Upgrading the Sydney Coordinated Adaptive Traffic System (SCATS)*

- *The EIS refers to benefits from road projects that are not part of the project's scope. The full costs, benefits and impacts of these projects need to be considered in a transparent process.*

Submission from:	Submission to:
Name: H. STACK Signature:	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
*Please **include** my personal information when publishing this submission to your website* ***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.*	Attn: Director – Transport Assessments
Address: 61 HAMPTON ST	Application Number: SSI 7485 Application
Suburb: ROYDON PARK Postcode 2133	Application Name: WestConnex M4-M5 Link

I submit my objection to the WestConnex M4-M5 Link as contained in the EIS application # SSI 7485, for the following reasons, **and ask that the Minister reject the application and require preparation of a genuine, not indicative, EIS**

◊ Because this is still based on a "concept design" it is unknown how the communities affected will not know what is being done below their residences, schools, business premises and public spaces, particularly if the whole project is sold into a private corporation's ownership before the actual designs and construction plans are determined. The EIS makes references to these designs and plans being reviewed but there is **NO** information as to what agency will be responsible for such reviews or whether the outcomes of such reviews will be made public. The communities below whose homes, business premises, public buildings and public spaces this massive project will be excavated and built will be completely in the dark about what is being done, what standards it is supposed to comply with, what inspection or scrutiny it will subject to, and whether the private corporations undertaking the work will be held to any liability by our government.

◊ The EIS permits trucks to access local roads in exceptional circumstances which includes queuing at the site. Given the constraints of the Darley Road site queuing will be the usual situation. The EIS needs to be amended to remove queuing as an exceptional circumstance. The truck movements should properly managed by the contractor so that there is no queuing. This exception will make it easier for contractors to neglect their obligation to monitor and manage truck movements in and out of the site and needs to be removed. The EIS needs to specifically mention all local streets abutting Darley Road and expressly prohibited truck movements (including parking) on these streets. This should include all streets from the north (James St) to the south (Falls Road), which are near the project footprint.

◊ Streets in Haberfield would be subject to heavy vehicle traffic for a further four years, making at least 7 years of heavy impacts on a single suburb. The answer is not a 'community strategy'. Residents who believed that their pain would be over after the M4 east are now being asked to sustain a further four years of impacts. No compensation or serious mitigation is suggested.

◊ The EIS states that investigation would be undertaken to confirm whether the Victoria Road bridge is a potential roost site for microbats. There will be attempts to 'manage potential impacts' if confirmed. This is inadequate. The project should not be permitted to impact on vulnerable species.

◊ I do not accept the finding in the Appendix P that there will be no noise exceedences during construction at Campbell Rd St Peters. There has been terrible noise during the early construction of the New M5. Why would this stop, especially given the construction is just as close to houses? Is it because the noise is already so bad that comparatively it will not be that much worse. This casts doubt on the whole noise study.

I submit my strongest objections to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: MARK FARLOW

Signature:

Please **include** my personal information when publishing this submission to your website
Declaration : I **HAVE NOT** made any reportable political donations in the last 2 years.

Address: 2 401/12 DENISON

Suburb: CAMPERDOWN Postcode 2050

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name:
WestConnex M4-M5 Link

- ◊ There will be 517 Heavy truck movements a day, of which 46 are stated to take place during peak hours from the Rozelle Rail Yard the largest amount of spoil truck movement on the whole of Stage 3. This will lead to a vast amount of extra noise and air pollution in this area. There will also be disturbance of soil in the old Rozelle Goods Yard which will be heavily contaminated with toxic substances. It is highly probable that there will be lead and asbestos. (as was the case in St Peters) You made no provision for the safe removal of these toxic substances in St Peters and the EIS makes no provision for their safe removal in this area.
- ◊ The EIS misrepresents the structure of the Global Economic Corridor and overstates the relationship of the project to centres within it by claiming the Project serves centres in the north of the GEC that it does not.

- ◊ I note that in the area of Lilyfield Rd and Gordon Street, the work proposed which would include deep excavation that would result in major adverse impacts on archaeological remains, while other surface works would have localised impacts on archaeological remains that may be present. It is suggested that what are called 'management measures' would be carried out including the development of a Historical Archaeological Research Design which would include an "assessment of any detailed design plans to develop a methodology and scope for a program of test excavation to determine the nature, condition and extent of potential archaeological remains." This is completely unacceptable to me. The community will have no right to any input into this plan or access to independent expert advice. This is all part of an 'approve now', 'research later' approach that will lead to poorly planned unnecessary destruction, a loss of potential community history and understanding.

- ◊ The cited 'key customers' that would benefit from the project (long distance, freight, businesses) represent a very small minority of those who are forecast to actually use the project (single occupancy commuter vehicles). The key customers could be served by a far more modest project, given they represent an extremely small proportion of projected traffic on the Project.

- ◊ The EIS (Section 3.2) does not set out the specific transport needs addressed by the project but states additional road capacity is required to meet a projected increase in trips. It does not set out any trips, desire lines, demand corridors or growth that the WestConnex project is addressing. As a result it is not possible to assess the project's ability to meet those needs. Nor is it demonstrated that projections in growth in population and employment correlate to traffic demand increase along the proposed M4-M5 Link.

Submission from:	Submission to:
Name: Geoff Smith Signature: *Please **include** my personal information when publishing this submission to your website* ***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.* Address: 16 College st Gladesville Suburb: Gladesville Postcode 2111	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001 Attn: Director – Transport Assessments Application Number: SSI 7485 Application Application Name: WestConnex M4-M5 Link

I submit this objection to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the following reasons, **and ask that the Minister reject the application.**

I. The EIS states that property damage due to ground movement may occur. We object to the project in its entirety on this basis. The EIS states that 'settlement, induced by tunnel excavation, and groundwater drawdown, may occur in some areas along the tunnel alignment'. The risk of ground movement is lessened where tunnelling is more than 35 metres. However, some tunnelling is at less than 10 metres. This proposed tunnel alignment creates an unacceptable risk of ground movement. In addition, the EIS states that there are a number of discrete areas to the north and northwest of the Rozelle Rail Yards, to the north of Campbell Road at St Peters and in the vicinity of Lord Street at Newtown where ground water movement above 20 milliliters is predicted 'strict limits on the degree of settlement permitted would be imposed on the project" and 'damage' would be rectified at no cost to the owner. would be placed (Executive Summary, xvii -iii). The project should not be permitted to be delivered in such a way that there is a known risk to property damage that cannot be mitigated to an acceptable level of risk.

II. The EIS identifies hundreds of risks at different construction sites. It relation to these risks the EIS recommends proceeding despite the risks; or seeking a way to mitigate risks during the "detailed design" phase. That phase excludes the public altogether. That is, the M4/M5 should be approved with no calculation of risks or what mitigation may mean for impacted residents.

III. Where is the commitment to community consultation and to long term planning when the EIS for the M4/M5 Link is released before any response to the extensive community feedback on the M4-M5 Link concept design could possibly have been seriously considered. This demonstrates deep government contempt for the people of NSW and the communities of the Inner West of Sydney in particular.

IV. Unfiltered stacks anywhere in Sydney are not unacceptable. There must be a review of the NSW government's unacceptable policy on this issue. I am appalled that the ex Minister for Planning Rob Stokes who approved the New M5 and unfiltered stacks in St Peters and Haberfield would declare that he would not have them in his own area. How can residents have any trust in a process that is underpinned by such hypocrisy.

V. The increased amount of traffic the M4-M5 Link will dump on the roads to and from the St Peters Interchange will have a heavy disruptive impact on the local transport routes, whether by vehicle, bus, or active transport (walking and cycling).

I submit my strongest objections to the M4-M5 Link proposals as contained in the EIS application # SSI 7485, and request the Minister to reject the application and require SMC / RMS to issue a true, not an 'indicative' and fundamentally flawed EIS

Name: ANNE GREIG

Signature: A F Greig

*Please **include** my personal information when publishing this submission to your website*
***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.*

Address: 26/84 ST GEORGES CRES

Suburb: DRUMMOYNE NSW Postcode 2047

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name:
WestConnex M4-M5 Link

- The City West Link Eastbound AM and PM peak hour and other locations."Table 7-19 shows that several locations are forecast to exceed theoretical roadway capacity with the increased background traffic and the construction traffic in the 2021 AM and PM peak hours. However, traffic on the majority of these roads would exceed their theoretical capacity even without the construction traffic, simply due to the growth in background traffic". So in the full knowledge that this area will be at capacity in 2021, massive amounts of construction traffic are going to be added for the whole construction period of 5 years. Even on completion it is stated in the EIS that traffic will be worse in this area than 'without the project'. This categorically shows that the planning of Westconnex is totally inadequate and needs major changes. It also shows that when completed Westconnex will not work. It is abundantly obvious that Rail/Metro is the only option to radically overhaul Sydney's failed transport systems

- I am completely opposed to approving a project in which the Air quality experts recommend rather than filtrating stacks extra stacks could be added later.

- 2 G Appendix P Table 5-27 of the EIS states that 43% of the Leichhardt- Glebe Precinct travel to work by Car, 21% by Bus and 5%by Rail. These are figures for 2011. These figures are being used to promote the project and suggest they are accurate today. In the case of Rail these figures are extremely questionable. The Light Rail is now hugely popular, it's use having grown enormously. It is travelling at full capacity at Peak hours. More services are being put in place. Apartment blocks are being built as close to the Light Rail corridor as possible. Residents see the Light Rail as an efficient, reliable and timely method of commuting to work. It is blatantly obvious that the Govt should be investing heavily in building and extending Light Rail, Metro and Rail. If this were pursued in a professional manner the necessity for trying to hoodwink the community into believing that Westconnex were needed would be totally unnecessary.

- The EIS was prepared by global engineering firm AECOM, which also prepared the EIS for Stages 1 and 2. When he approved these earlier stages, the then Minister for Planning Rob Stokes pointed to conditions of approval that would minimise impacts on communities. But the impacts have turned out to worse than expected.

I object to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: ANNE GREIG

Signature: A. E. Greig

*Please **include** my personal information when publishing this submission to your website*
***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.*

Address: 26/84 ST GEORGES CRES

Suburb: DRUMMOYNE NSW Postcode 2047

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

- Given that the modelling for air quality is based on the traffic modelling, which, as shown above, is fundamentally flawed, and given poor air quality has a significant health impact the EIS should not be approved until an independent scientifically qualified reviewer has analysed the stated air quality outcomes and identified any deficits

- Significant declines in pollutants are due to improvements to in-vehicle technology and fuel. However, plans to improve standards for heavy vehicles, which disproportionately contribute to NOx emissions and thus ozone, appear to have stalled. The proponent needs to provide a scenario that sets out impacts due to delays in adopting improved emission standards.

- Part 3 of the Secretary's Environmental Assessment Requirements requires assessment of the likely risks of the project to public safety, paying particular attention to pedestrian safety. This is not addressed in Chapter 8.

- The EIS admits that the people who live in western Sydney have lower incomes than in the inner suburbs and that the tolls will therefore be a heavier cost in Emu Plains, Penrith, Mt Druitt, Blacktown or Wetherill Park than in Strathfield or Padstow. This is unfair when the benefits of Stage 3 are all for north-south connections to the northern beaches or the proposed new harbour tunnel.

- The original objectives of the project specified improving road and freight access to Sydney Airport and to Port Botany. We now have the proposals for Stages 1,2 and 3 and they don't even go to Port Botany or Sydney Airport. We are being asked to support Stage 3 of WestConnex on the basis of more major unfunded projects that are barely sketches on a map.

- The EIS provides traffic projections for the 'With Project' scenario and 'cumulative' scenario (which in addition to links in the 'With Project' scenario includes the Beaches Link and F6 motorway connections), but when referencing the traffic benefits/impacts in the early sections, the EIS appears to cite the 'with project' scenario rather than Cumulative Scenario. It is unclear which scenarios the Business Case best reflects.

- We know the state government intends to sell the project, both the constructing and the operation. I object to the privatization of the road system. There is no guarantee of protecting the public interest in an efficient transport system when so much of it operates to make a profit for shareholders.

- The modelling makes no mention of bus lanes on Victoria Rd. If these lanes were not modelled as car lanes the assumed capacity of the road is incorrect.

- The modelling shows severe degradation to the City West Link if the Western Harbour Tunnel is connected.

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: ANNE GREIG
	Address: 26/84 ST GEORGES CRES
Application Number: SSI 7485	Suburb: DRUMMOYNE Postcode 2047
Application Name: WestConnex M4-M5 Link	Signature: A. F. Greig.

Please include my personal information when publishing this submission to your website
Declaration: I HAVE NOT made any reportable political donations in the last 2 years

I object to the whole of the WestConnex Project, and the specific WestConnex M4-M5 Link proposals as contained in the EIS application, for the following reasons, and request the Minister reject the application.

- The increased amount of traffic the M4-M5 Link will dump on the roads to and from the St Peters, Haberfield and Rozelle Interchanges will disrupt local transport networks including bus and active transport (walking and cycling)

- There are overlaps in the construction periods of the New M5 and M4 of up to one year. This will significantly worsen impacts for residents close to construction areas. No additional mitigation or any compensation is offered for residents for these periods.(Executive Summary xxvii). It is unacceptable that residents should have these prolonged periods of exposure to more than one project. The EIS makes no attempt to measure or mitigate the cumulative impact of these prolonged periods of construction noise exposure.

- Out of hours work - Pyrmont Bridge Road site - Up to 14 'receivers' at this site are predicted to have impacts from high noise impacts during out of hours work for construction and pavement works for approximately 2 weeks caused by the use of a rock-breaker. Again, no plans to relocate or compensate residents affected is provided in the EIS (EIS, XV) The only mitigation contained in the EIS is that the use of the road profiler is to be limited during out of hours works 'where feasible.' (Table 5-120) In other words, there is no mitigation whatsoever for residents affected by daytime noise and a possibility that they will be similarly affected out of hours where the contractor considers that it isn't feasible to limit the use of the road profiler. This represents an inadequate response to managing these severe noise impacts for residents.

- Targets for renewable energy and offsets are unclear

- Noise from trucks entering and exiting the site - Pyrmont Bridge Road site - The EIS states that there will be noise 'exceedances' for trucks entering and exiting the site (Table 5-120) No detail is provided as to the level of any such 'exceedance'. Nor does it propose any mitigation other than investigations into 'locations' where hoarding above 2 metres can be utilized to control trucks in the queuing area. This does not result in any firm plans to manage the noise. Nor is enough detail provided so that those affected can comment on the effectiveness of this proposed mitigation measure

- Increased traffic on Bridge Road, Wattle Street and the Western Distributor will reduce the amenity and value of the investment in the renewal of the Fish Markets and renewal of the Bays Market District

- Despite the promise of the WestConnex business case, Parramatta Road remains a barrier to urban revitalisation. There is no discussion of this commitment in the EIS.

I submit my strongest objections to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: GARY CONATY

Signature: [signature]

Please include my personal information when publishing this submission to your website
Declaration: I HAVE NOT made any reportable political donations in the last 2 years.

Address: 285 VICTORIA PLACE

Suburb: DRUMMOYNE Postcode 2047.

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name:
WestConnex M4-M5 Link

normal working hours. Access to the EIS is very difficult without access to a personal computer. This totally restricts open community engagement.

- The Rozelle Rail Yards site is the location of 3 Unfiltered Pollution Stacks. There is a fourth stack on Victoria Rd close to Darling St. If the Western Harbour Tunnel is built there will also be a total of 7 Tunnel Portals. Tunnel Portals are also areas of high levels of pollution. It is totally unacceptable that the Pollution Stacks are unfiltered. In 2008 Gladys Berejiklian said of Labor "It's not too late, the Government can still ensure that filtration is a possibility. World's best practice is to filter tunnels. Why won't Labor allow people to sleep at night, knowing their children aren't inhaling toxins that could jeopardize their health now or in the future." It is totally unacceptable that the tunnels will not be filtered. Recently built tunnels in Tokyo successfully filter 98% of all pollutants.

- There is no reliable evidence presented (or available) that building motorways reduces traffic congestion over the long term. No major urban arterial road project, without carefully considered and implemented pricing signals, has succeeded in easing congestion for more than a few years. This is universally acknowledged in planning disciplines, and is replicated by the Future Transport website, has been stated by the current Minister for Transport and the current Premier (during her time as Shadow Minister for Transport).

- There will be 517 Heavy truck movements a day, of which 46 are stated to take place during peak hours from the Rozelle Rail Yard the largest amount of spoil truck movement on the whole of Stage 3. This will lead to a vast amount of extra noise and air pollution in this area. There will also be disturbance of soil in the old Rozelle Goods Yard which will be heavily contaminated with toxic substances. It is highly probable that there will be lead and asbestos. (as was the case in St Peters) You made no provision for the safe removal of these toxic substances in St Peters and the EIS makes no provision for their safe removal in this area.

- The EIS (Section 3.2) does not set out the specific transport needs addressed by the project but states additional road capacity is required to meet a projected increase in trips. It does not set out any trips, desire lines, demand corridors or growth that the WestConnex project is addressing. As a result it is not possible to assess the project's ability to meet those needs. Nor is it demonstrated that projections in growth in population and employment correlate to traffic demand increase along the proposed M4-M5 Link.

Attention Director
Application Number: SSI 7485

Infrastructure Projects, Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001
Application Name:
WestConnex M4-M5 Link

Name: GARY CONATY

Signature: [signature]

Please include my personal information when publishing this submission to your website. I HAVE NOT made reportable political donations in the last 2 years.

Address: 285 VICTORIA PLACE

Suburb: DRUMMOYNE Postcode 2047

I submit my objection to the WestConnex M4-M5 Link proposals for the reasons stated below, and request the Minister reject the application entirely, and cause the proponents to reissue an EIS that is based on a fully researched, developed, and budgeted concept design, and require the proponents to prepare a new business case against that design.

- Rozelle Rail Yards will have 400 car parking spaces provided for site workers(EIS). The daily workforce for these sites is shown to be approximately 550. This means that 150 vehicles will need to park in nearby local streets which are already at full capacity during weekdays from commuters parking and taking the light rail.

- I am concerned that while hundreds of impacts on resident, including noise, loss of business, dust, and lost time through more traffic congestion, are identified in the EIS, the approach is always to recommend approval and promise vague 'mitigation' in the future. This is not good enough.

- The EIS proposes that all trucks will arrive at the Darley Road civil and tunnel site from Haberfield and travel along Darley Road to the site, with a right-hand turn now permitted into James Street. The proposed route will result in a truck every 3-4 minutes for 5 years running directly by the small houses on Darley Road. These homes will not be habitable during the five-year construction period due to the unacceptable noise impacts. The truck noise will be worsened by their need to travel up a steep hill to return to the City West Link, so the noise impacts will affect not just those homes on or immediately adjacent to Darley Road.

- The newly formed Greater Sydney Commission is currently preparing strategic plans (six District Plans and the Greater Sydney Region Plan) for Sydney's long-term future and TfNSW is currently developing Sydney's Transport Future. All motorway projects should be placed on hold until finalisation of these plans.

- There will be major impacts on the Anzac Bridge with a projected increase of 60% in daily traffic. There will also be major impacts to the Sydney City Centre. The EIS states that this will lead to major impacts on bus travel time and reliability. The EIS's suggests that people will have to adjust their travel times to starting for work earlier and finishing later. This is unacceptable and underlines Westconnex's waste and total failure.

- The Westconnex has been described as an integrated transport network solution. This is totally untrue as the role and integration with public transport and freight rail has not been assessed. The Government recently committed to a Metro West so this throws into question the need for Westconnex. This is especially so as the Westconnex business case outlines a shift from public transport to toll roads as a benefit. This needs to be justified economically. The EIS does not do this.

- The EIS is a strategy only document, it does not commit to any design and it therefore does not address any local impacts created by the proposed M4-M5 Link. Rather it prepares the pathway for sale of the Sydney Motorways Corporation to the private sector, removing from the responsibility, oversight and control of the Government the final design, cost and implementation of the M4-M5 Link.

Attention Director
Application Number: SSI 7485

Infrastructure Projects, Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Application Name:
WestConnex M4-M5 Link

Name: GARY CONATY

Signature:

Please include my personal information when publishing this submission to your website.
~~HAVE NOT~~ made reportable political donations in the last 2 years.

Address: 285 VICTORIA PLACE

Suburb: DRUMMOYNE Postcode 2047

I object to the WestConnex M4-M5 Link proposals for the following reasons, and request the Minister reject the application, and require SMC and RMC to prepare a new EIS that is based on genuine, not indicative, design parameters, costings, and business case.

- The Rozelle Interchange will prevent major redevelopment in the Rozelle area. This area has been identified by the NSW Government as a major opportunity for urban renewal for over 20 years. Light construction vehicle routes – the EIS acknowledges that these vehicles will use 'dispersed' routes (8-62). In other words, construction vehicles will use and park on local roads. The EIS does not propose any management as to which roads they use.

- The addition of 70-100 light vehicle movements day in Leichhardt will result in our small, congested streets, which are already at capacity and suffering parking shortages, will have the added impact of workers travelling to and from the site and parking in local streets. There will be rat running. The EIS should provide an agreed route (using arterial roads only) that can be used by all vehicles associated with the project.

- It is stated that the hugely expensive Stage 3 M4/M5 link is required as a link between the two motorways. This is totally untrue. The A3 is the primary eastern link between the two motorways and it is described in the State Road network system as the M4- M5 Connector.

- I object to the assessment of the removal of buildings, other rail infrastructure and vegetation on the Rozelle Railway Yards being done in advance of this EIS. The RMS environmental assessment process is not publicly accountable. These works were part of the WestConnex project and should have been assessed as part of Stage 3.

- To the west there are the M7, A6 and A3 connections. There has been no modelling provided of whether with appropriate upgrades these connections might provide far more cost effective and time efficient connections, particularly given their alignments would service multiple demand corridors.

- The EIS does not set out a credible strategic rationale for WestConnex. There is no informed discussion on the economic geography of Sydney, and the role an integrated transport system has to play in meeting the needs of businesses and residents.

- Motor vehicles account for 14% of Particulate Pollution of 2.5 microns and less in Australia. There is no safe level to exposure to particulate matter of 2.5 microns and less. Fine particulate matter is linked with Asthma, Lung Disease, Cancer, Stroke and poor lung development in children. Those most at risk are the old, the young and the unborn of pregnant women.

Attention Director
Application Number: SSI 7485

Infrastructure Projects, Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Application Name:
WestConnex M4-M5 Link

Name: MARTIN WATSON

Signature:

Please include my personal information when publishing this submission to your website.
I HAVE NOT made reportable political donations in the last 2 years.

Address: 66 CURTIS RD

Suburb: BALMAIN Postcode 2041

I object to the WestConnex M4-M5 Link proposals for the following reasons, and request the Minister reject the application, and require SMC and RMC to prepare a new EIS that is based on genuine, not indicative, design parameters, costings, and business case.

- I strongly object to the WestConnex M4-M5 Link for a multitude of reasons, including :
  - It is a toll road project made for big business, searching for a rationale.
  - It fails to meet the primary objectives of providing a direct motorway connection between Western Sydney and Sydney Airport and Port.
  - The Environmental Impact Statement does not safeguard communities. Government is seeking planning approval to sell the project to the private sector and discharging its responsibility and control for the delivery of the project.
  - There is a lack of strategic justification for the project, No feasible alternatives have been developed or assessed.
  - There will be major impacts on the Anzac Bridge (projected 60% increase in daily traffic) and Sydney City Centre. The EIS forecasts major impacts on bus travel time and reliability.
  - The EIS does not adequately account for impacts on health and air quality. The EIS identifies an additional 5 unfiltered ventilation stacks to be constructed in inner Sydney. In addition local surface roads will be widened and traffic volumes will increase.
  - Lack of alignment with the NSW Government's priorities and policies
  - Major impacts on the community
  - Legacy Impacts and worsening intergenerational equity
  - Other global cities are investing in fast and efficient public transport that truly connects homes and jobs, supports the decentralisation of commercial investment and develops a resilient and equitable city for future generations.

- At the Rozelle Rail Yards site there will be 2 entry/exits for Heavy vehicles off the City West Link. Extra traffic controls are to be set up with extra sequences of traffic light controls to enable spoil trucks to access and exit this site. It is stated there will be 517 Heavy Truck movements as day of which 46 will be in Peak hours, plus 10 truck movements from the Crescent site. Maps showing the truck movements show that all these trucks will use the City West link. Similar maps for Darley Rd dive site also show trucks from there using the City West Link. At a consultation with a Westconnex staff member it was stated that trucks removing spoil from Camperdown dive site would be stationed and called up from James Craig Rd, so there will also be a constant movement of trucks from this location onto the City West Link. The EIS states the cumulative effect of truck movements from all sites onto the City West Link will be 700 one way Heavy truck movements a day and of that 208 will be in Peak hours. This will cause total gridlock. The EIS says other routes maybe considered; there are no details of these. This is unacceptable as it would allow a privately owned SMC to make whatever decisions they saw fit when and if the EIS is approved with no input from the community allowed.

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: GIANCIENE ALLAN. Address: 21 MILTON ST
Application Number: SSI 7485	Suburb: LEICHHARDT. Postcode 2040.
Application Name: WestConnex M4-M5 Link	Signature: G. Allan
Please include my personal information when publishing this submission to your website ***Declaration : I HAVE NOT made any reportable political donations in the last 2 years.***	

I object to the whole of the WestConnex Project, and the specific WestConnex M4-M5 Link proposals as contained in the EIS application, for the following reasons, and request the Minister reject the application.

- The WestConnex program of works has been described as an integrated transport network solution. However, the role and interdependency with public transport and freight rail is not considered. The recent Government commitment to a Metro West requires a rethink on the need for WestConnex. Particularly as the WestConnex business case outlines a mode shift from public transport to the toll road as a benefit required to justify it economically.

- While WestConnex might integrate with the wider motorway network, no evidence is provided demonstrating that it integrates with the wider road network – let alone the broader transport and land use system. For example the EIS provides no information about changes in traffic volumes entering the Sydney CBD caused by WestConnex. RMS has only just commenced work to identify which roads fanning out from WestConnex portals will need to be upgraded to deliver large numbers of vehicles to and from the project. It is thereformpossible to form a properly informed understanding of the environmental impacts – the very purpose of the EIS.

- The EIS states that the project will improve connection to the Sydney Airport and Port Botany. It will not. The Premier herself has said that the Sydney Gateway does not form part of the WestConnex project. Without the Sydney Gateway, connections between WestConnex (St Peters Interchange) and Sydney Airport and Port Botany will be via congested surface roads in Botany and Mascot. As the connection is unresolved, it is impossible to determine the effect on demand of the unknown pricing regime that will apply to the Sydney Gateway, nor how much travel time will be incurred – which might actually negate the already marginal proposed travel time savings.

- It is quite clear to me that insufficient research has been done on the archeology of the Rozelle Railway yards. This could be a valuable archeology site. Why has an EIS been put forward without the necessary research being done to further identify potential remains? No project should be approved on the basis of such an inadequate level of research.

- Ambient air quality - There is no evidence provided in the EIS that the ventilation outlets will be date. The EIS simply states that 'the ventilation outlets would be designed to effectively disperse the emissions from the tunnel and are predicted to have negligible effect on local air quality (xiv, Executive Summary). This is inadequate and details of the impacts on air quality need to be provided so that the residents and experts can meaningfully comment on the impact.

I submit my strongest objections to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: Lee Tennent

Signature: Lee T

Please **include** my personal information when publishing this submission to your website
Declaration : I **HAVE NOT** made any reportable political donations in the last 2 years.

Address: 65 Curtis Rd

Suburb: Balmain 2041 Postcode

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name:
WestConnex M4-M5 Link

◊ The WestConnex route has changed significantly over time, even after the initial August 2013 Business Case was approved by the NSW Government but not made public. Therefore an Updated Business Case on an updated concept was published in 2015. SGS Economics and Planning undertook a detailed assessment of this and reached the following conclusions:

- Misrepresentation of the Benefit Cost Ratio (BCR) as 1.71 when it was 1.64.
- The Business Case did not identify Stage 3 WestConnex, connecting the M4 to the M5, as a priority for "filling in the missing links in Sydney's motorway network".
- Modelling for post-2031 conditions was not undertaken, however benefits were assumed to continue until 2052.
- The transport modelling is likely to have underestimated the impact of extra traffic induced by the additional capacity, which would significantly reduce the BCR.
- The Business Case did not reflect global approaches to congestion management, such as transit investment and demand management.
- The Business Case suggested WestConnex would help renew Parramatta Road by reducing traffic on it, despite the modelling showing that many parts of it would carry more traffic, not less.
- Travel time savings are a key component of the positive BCR. A significant proportion of these supposed benefits arise from travel time savings were within the margin of error of modelling, or would be so small that motorists may not notice them (and therefore would not value them).
- Insufficient justification was provided for the significant travel time savings, and economic benefits, factored into the BCR for business and light commercial vehicles – for instance there was insufficient analysis of origins and destinations of these trips.
- The construction costs appear too conservative – if these increase, the BCR would reduce accordingly.
- Other costs were not accounted for, such as reduced amenity on urban development, loss of land for higher value activities, and the health costs of potentially reduced public transport use.
- In summary, SGS suggested that the actual BCR of the project could be less than 1:1, with NSW taxpayers exposed to the risk that the project may not succeed.

◊ The project fails to address its most fundamental objective of connecting to Port Botany, the genesis of the entire enterprise

Attention Director *Application Number: SSI 7485* *Infrastructure Projects, Planning Services,* *Department of Planning and Environment* *GPO Box 39, Sydney, NSW, 2001* *Application Name:* *WestConnex M4-M5 Link*	*Name:* Catherine Holbeche *Signature:* Catherine Holbeche *Please include my personal information when publishing this submission to your website. I HAVE NOT made reportable political donations in the last 2 years.* *Address:* 36 Blaxcell St *Suburb:* Balmain *Postcode* 2041

I submit my objection to the WestConnex M4-M5 Link proposals for the reasons stated below, and request the Minister reject the application entirely, and cause the proponents to reissue an EIS that is based on a fully researched, developed, and budgeted concept design, and require the proponents to prepare a new business case against that design.

◊ Other planning issues are excluded from cost-benefit analysis, which is a key component of developing a business case:

- No analysis of equity impacts of the infrastructure investment and the tolling regime, given the lower socio-economic status of many areas of Western Sydney, and the requirement for potential users of WestConnex to own or pay for access to a private vehicle to be able to use it
- The localised impact of air quality around the ventilation outlets should have been accounted for.
- Impacts associated with loss of amenity from reduced access to open space should have been accounted for.

◊ There will be major impacts on the Anzac Bridge with a projected increase of 60% in daily traffic. There will also be major impacts to the Sydney City Centre. The EIS states that this will lead to major impacts on bus travel time and reliability. The EIS's suggests that people will have to adjust their travel times to starting for work earlier and finishing later. This is unacceptable and underlines Westconnex's waste and total failure.

◊ Lack of ability to comment on the urban design as part of the approval process - The EIS does not provide any opportunity to comment on the urban design and landscape component of the project. It states that 'a detailed review and finalisation of the architectural treatment of the project operational infrastructure would be undertaken ;during detailed design'. The Community should be given an opportunity to comment upon and influence the design and we object to the approval of the EIS on the basis that this detail is not provided, nor is the community (or other stakeholders) given an opportunity to comment or influence the final design.

◊ The Westconnex has been described as an integrated transport network solution. This is totally untrue as the role and integration with public transport and freight rail has not been assessed. The Government recently committed to a Metro West so this throws into question the need for Westconnex. This is especially so as the Westconnex business case outlines a shift from public transport to toll roads as a benefit. This needs to be justified economically. The EIS does not do this.

◊ The EIS is a strategy only document, it does not commit to any design and it therefore does not address any local impacts created by the proposed M4-M5 Link. Rather it prepares the pathway for sale of the Sydney Motorways Corporation to the private sector, removing from the responsibility, oversight and control of the Government the final design, cost and implementation of the M4-M5 Link.

Attention Director
Application Number: SSI 7485

Infrastructure Projects, Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Application Name:
WestConnex M4-M5 Link

Name: JAMES MAGUIRE

Signature:

Please include my personal information when publishing this submission to your website.
I HAVE NOT made reportable political donations in the last 2 years.

Address: 78 PALMER STREET

Suburb: BALMAIN *Postcode* 2041

I object to the WestConnex M4-M5 Link proposals for the following reasons, and request the Minister reject the application, and require SMC and RMC to prepare a new EIS that is based on genuine, not indicative, design parameters, costings, and business case.

- Cumulative construction impacts - Camperdown. The EIS states that residents will likely be subject to cumulative construction impacts as several tunnelling works activities may operate simultaneously (10-119, EIS) No mitigation steps are proposed to ease this impact on those affected.

- The EIS is based on the fallacy that the M4 and-M5 need linking when they are already linked by the M7, A6 and A3. The A3 is the primary eastern link between the two motorways and is shown in the State Road network hierarchy as the M4-M5 Connector.

- I am concerned that the AECOM, the company responsible for the EIS, always approves knocking down heritage buildings if the project requires it. It doesn't how much value it holds for the community, it must always be destroyed.

- Ground-borne out-of-hours work - Camperdown The EIS acknowledges the noise and vibration impacts and the need for work to occur outside of standard daytime construction hours. It simply states that 'the specific management strategy for addressing potential impacts associated with ground-borne noise...would be documented in the OOHW protocol. This is inadequate as the community have no opportunity to comment on the OOHW protocol or the management of the ongoing impacts to which they will be subjected.

- I strongly object to the WestConnex M4-M5 Link for a multitude of reasons, including :
  i. It is a toll road project made for big business, searching for a rationale.
  ii. It fails to meet the primary objectives of providing a direct motorway connection between Western Sydney and Sydney Airport and Port.
  iii. The Environmental Impact Statement does not safeguard communities. Government is seeking planning approval to sell the project to the private sector and discharging its responsibility and control for the delivery of the project.
  iv. There is a lack of strategic justification for the project, No feasible alternatives have been developed or assessed.
  v. There will be major impacts on the Anzac Bridge (projected 60% increase in daily traffic) and Sydney City Centre. The EIS forecasts major impacts on bus travel time and reliability.
  vi. The EIS does not adequately account for impacts on health and air quality. The EIS identifies an additional 5 unfiltered ventilation stacks to be constructed in inner Sydney. In addition local surface roads will be widened and traffic volumes will increase.
  vii. Lack of alignment with the NSW Government's priorities and policies
  viii. Major impacts on the community
  ix. Legacy Impacts and worsening intergenerational equity
  x. Other global cities are investing in fast and efficient public transport that truly connects homes and jobs, supports the decentralisation of commercial investment and develops a resilient and equitable city for future generations.

Submission from:	Submission to:
Name: JAMES M. A. GUIRE Signature: *Please **include** my personal information when publishing this submission to your website* ***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.* Address: 78 PALMER STREET Suburb: BALMAIN Postcode 2041	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001 Attn: Director – Transport Assessments Application Number: SSI 7485 Application Application Name: WestConnex M4-M5 Link

I submit my objection to the WestConnex M4-M5 Link as contained in the EIS application # SSI 7485, for the following reasons, **and ask that the Minister reject the application and require preparation of a genuine, not indicative, EIS**

- *An on-line interactive map was published with the M4-M5 Concept Design that indicated a very wide yellow 'swoosh' that is upwards of a kilometre wide in some sections of the M4-M5 proposals. SMC have NEVER publicly published or acknowledged that the contractor to be appointed to build the tunnels will be 'encouraged' to do so within the yellow swoosh footprint, but may go outside the indicative swoosh area if found necessary after further geotech and survey work. The proposed Sydney Water Tunnels surveys (EIS 12-57) could potentially see a dramatic change in the tunnel alignments in the Newtown area. Why were these surveys not done during the past three years such that 'definitive' rather than 'indicative' alignments could be published. The EIS should be withdrawn till such time that it is a true and fair 'definitive' document open for genuine public comment.*

- *I object to the location of a permanent substation and water treatment plant following the completion of the project on the Darley Road site. This will limit the future uses of the land and the community has been continually assured that the land, which is Government-owned, would be available for community purposes. The presence of this facility will forever prevent the ability for safe and direct pedestrian access to the light rail stop, with users required to walk down a dark and winding path. It will also limit the future use of the site. If a permanent facility is to be located then it should be moved to the north of the site so that it is out of sight of homes and has less visual impact on residents.*

- *Traffic operational modelling – Leichhardt. The EIS does not provide any operational modelling for the Darley Road area (8-11), despite the fact 170 vehicles a day are proposed to enter this highly congested (during peak hours) area. Darley Road is a critical arterial road for commuters accessing the City West Link and this analysis should be provided so that impacts can be properly assessed.*

- *There is a higher than average number of shift workers in the Inner West. The EIS acknowledges that even allowing for mitigation measures such as acoustic sheds and noise walls, shift workers will be more vulnerable to impacts of years of construction work and will consequently be at risk of a loss of quality of life, loss of productivity and chronic mental and physical illness.*

- *The project directly affected five listed heritage items, including demolition of the stormwater canal at Rozelle. Twenty-one other statutory heritage items of State or local heritage significant would be subject to indirect impacts through vibration, settlement and visual setting. And directly affected nine individual buildings as assessed as being potential local heritage items. It is unacceptable that heritage items are removed or potentially damaged and the approval should prohibit such destruction.(Executive Summary xviii)*

I submit my strongest objections to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: Joyce GROOT

Signature: J Groot

Please **include** my personal information when publishing this submission to your website
Declaration: I **HAVE NOT** made any reportable political donations in the last 2 years.

Address: 7/16-18 Palmer St

Suburb: Balmain Postcode 2041

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name:
WestConnex M4-M5 Link

- I note that in the area of Lilyfield Rd and Gordon Street, the work proposed which would include deep excavation that would result in major adverse impacts on archaeological remains, while other surface works would have localised impacts on archaeological remains that may be present. It is suggested that what are called 'management measures' would be carried out including the development of a Historical Archaeological Research Design which would include an "assessment of any detailed design plans to develop a methodology and scope for a program of test excavation to determine the nature, condition and extent of potential archaeological remains." This is completely unacceptable to me. The community will have no right to any input into this plan or access to independent expert advice. This is all part of an 'approve now', 'research later' approach that will lead to poorly planned unnecessary destruction, a loss of potential community history and understanding.

- The NSW Government appears to have accepted the project as part of a State Infrastructure Strategy and other plans before a business case was even developed. There was no incentive to explore alternatives or to fully explore the costs and benefits. This process has been described as "lock in". Commitment escalates because a project appears in numerous policy documents. WestConnex is a clear example of government "locking in" commitment before detailed analysis had been undertaken.With the Government fully locked-in to WestConnex, these issues and inadequacies with the Updated Business Case are repeated in the EIS.

- Crucially, to make the sale more attractive, the tunnels between Haberfield and St Peters will be built independently of the Rozelle Interchange.This is being done to de-risk the project for the private sector sale, as the tunnels can be built using known standards and technology and generate income from January 2023. It would appear that the building of the Rozelle Interchange is so risky that no contractor tendered for the contract in the original tender period.

Attention Director *Application Number: SSI 7485* *Infrastructure Projects, Planning Services,* *Department of Planning and Environment* *GPO Box 39, Sydney, NSW, 2001* *Application Name:* *WestConnex M4-M5 Link*	*Name:* Joyce Groot *Signature:* Groot *Please include my personal information when publishing this submission to your website. I HAVE NOT made reportable political donations in the last 2 years.* *Address:* 7/16-18 Palmer St *Suburb:* BALMAIN *Postcode* 2041

I submit my objection to the WestConnex M4-M5 Link proposals for the reasons stated below, and request the Minister reject the application entirely, and cause the proponents to reissue an EIS that is based on a fully researched, developed, and budgeted concept design, and require the proponents to prepare a new business case against that design.

- Rozelle Rail Yards will have 400 car parking spaces provided for site workers(EIS). The daily workforce for these sites is shown to be approximately 550. This means that 150 vehicles will need to park in nearby local streets which are already at full capacity during weekdays from commuters parking and taking the light rail.

- I am concerned that while hundreds of impacts on resident, including noise, loss of business, dust, and lost time through more traffic congestion, are identified in the EIS, the approach is always to recommend approval and promise vague 'mitigation' in the future. This is not good enough.

- The EIS proposes that all trucks will arrive at the Darley Road civil and tunnel site from Haberfield and travel along Darley Road to the site, with a right-hand turn now permitted into James Street. The proposed route will result in a truck every 3-4 minutes for 5 years running directly by the small houses on Darley Road. These homes will not be habitable during the five-year construction period due to the unacceptable noise impacts. The truck noise will be worsened by their need to travel up a steep hill to return to the City West Link, so the noise impacts will affect not just those homes on or immediately adjacent to Darley Road.

- The newly formed Greater Sydney Commission is currently preparing strategic plans (six District Plans and the Greater Sydney Region Plan) for Sydney's long-term future and TfNSW is currently developing Sydney's Transport Future. All motorway projects should be placed on hold until finalisation of these plans.

- There will be major impacts on the Anzac Bridge with a projected increase of 60% in daily traffic. There will also be major impacts to the Sydney City Centre. The EIS states that this will lead to major impacts on bus travel time and reliability. The EIS's suggests that people will have to adjust their travel times to starting for work earlier and finishing later. This is unacceptable and underlines Westconnex's waste and total failure.

- The Westconnex has been described as an integrated transport network solution. This is totally untrue as the role and integration with public transport and freight rail has not been assessed. The Government recently committed to a Metro West so this throws into question the need for Westconnex. This is especially so as the Westconnex business case outlines a shift from public transport to toll roads as a benefit. This needs to be justified economically. The EIS does not do this.

- The EIS is a strategy only document, it does not commit to any design and it therefore does not address any local impacts created by the proposed M4-M5 Link. Rather it prepares the pathway for sale of the Sydney Motorways Corporation to the private sector, removing from the responsibility, oversight and control of the Government the final design, cost and implementation of the M4-M5 Link.

I object to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: John Doyle

Signature: [signature]

*Please **include** my personal information when publishing this submission to your website **Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.*

Address: 57 Glan St.

Suburb: Balmain Postcode

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

A. Permanent substation and water treatment plant - Residents on Darley Rd opposite the site and residents in Hubert St will have a direct line of site to the Motorway operation infrastructure. The resultant impact is a permanent degradation of the visual environment, is a loss of amenity and is detrimental to the community. This facility should not be permitted in this location and the EIS needs to demonstrate why it is required at this site. If approved, the facility should be moved to the north of the site out of line of site of residents. The residual land should be returned for community purposes, such as green space, with future commercial uses ruled out. If the community is forced to endure 5 years of severe disruptions due to this toll road, the compensation should, at the very least, result in the land being returned to the community as green space.

B. It is clear from the EIS that spoil truck movements will not be confined to the City West link. At a community consultation it was revealed that trucks removing spoil at Camperdown would very likely be travelling from the James Craig Rd area and in that case would be using the additional lane on the Crescent and then turning right up Johnston St. This is totally CONTRARY to what concerned residents had been promised would not happen. It is clear that any assurances given to the community in past consultations are totally disregarded without consultation later. This is unacceptable.

C. Heart disease will skyrocket due to air pollution caused by Westconnex bringing more cars into the Inner West says Paul Torzillo, Head of Respiratory medicine at Royal Prince Albert Hospital. Inner West Courier 23rd May 2017

D. The removal of spoil at the Rozelle Rail Yards will lead to the largest amount of Spoil truck movements on the entire Stage 3 project: 517 Heavy truck movements a day, of which 46 are stated to take place at Peak hours. There will also be 10 Heavy truck movements a day from the Crescent Civil Site. The sheer number of trucks on the road will lead to massive increases in congestion. Maps in the EIS have the spoil trucks going to and from these sites from the Haberfield direction on the City West Link. This is also the direction that is being proposed for spoil truck movements from Darley Rd which is said to have 100 Heavy truck movements a day. It is stated that the cumulative effect of truck movements from all sites on the City West Link will be 700 (one way) Heavy truck movements a day and of that 208 will be in Peak hours. This plan totally lacks credibility

E. The Concept Design was a woefully inadequate document totally devoid of any real depth of detail in terms of maps, scales, distances with only vague suggestions and glamorized Artist's Impressions of an idealized view of what Stage 3 would be like. It was another example of current city planning documents that consistently accentuate huge areas of tranquil green spaces with families and children out walking and riding bicycles in idealized parks and suburbs. All this is total PR spin and bears no reality about the real outcome of the build. It bears no reality as to what Stage 3 of Westconnex will be like.

F. I am concerned that while the EIS finds that tolls do weigh more heavily on lower income motorists, there is no serious analysis of the blatant unfairness of letting of private consortium toll people for decades in order to pay for less profitable tollways for wealthier communities.

I wish to submit my objection to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485. The reasons for objecting are set out below.

Name: A. TOBIN

Signature:

Please include my personal information when publishing this submission to your website
***Declaration** : I HAVE NOT made any reportable political donations in the last 2 years.*

Address: 5 CARLINGLE ST

Suburb: BALMAIN Postcode 2041

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

- The operational Green House Gas (GHG) assessment is based on the WestConnex Road Traffic Model version 2.3 (WRTM v2.3).This model has major flaws and the unreliable outputs of the model put into question the GHG assessment.

- The proposed Inner West Subsurface Interchange, planned as part of Stage 1 (Vol 2B Appendix E p 1), linking the 2 mainline tunnels with the Rozelle Interchange and the Iron Cove link is of serious concern, there has been little information about the Inner West Interchange, its construction or exactly which streets it would affect. At Westconnex Information sessions held in the inner west in Sept 2017 staff state the path of the tunnels and the Interchange are 'indicative only'. How are residents expected to submit submissions without knowing if their street is affected?

- Both the St Peters Active Recreation Area and the Rozelle Interchange Open Space are a false promise. Unless there is an agreement for construction and management these will be grassed wastelands with compromised amenity, adjoined by ventilation facilities in Rozelle, divided by above ground portals and difficult to access across busy roads

- The project would take land intended for housing and employment specified in The Bays Precinct Transformation Plan.

- Significantly, there is nothing in the EIS to ensure that tunnelling would be at a sufficient depth so as not to endanger the integrity of homes, including vibration, and noise impacts. Further, without provision for full compensation for damage sustained there would be no incentive for contractors, or Roads and Maritime Services, to minimise damage to homes or indeed to have any concern for damage sustained.

- Scientists have found that there is no safe level of air pollution. As pollution levels rise deaths and hospitalisations rise too. A thorough cost-benefit analysis that takes into account the health effects due to increased exposure is required.

- Given that these works could be undertaken to deliver toll paying drivers to the privately owned WestConnex, there is strong potential for a conflict between private profit and community impacts. The cost of any such integration works should very clearly be attributed to the Project cost, and should not impact on the available RMS budget for the State road network normal maintenance and improvement budget.

I wish to submit my objection to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485. The reasons for objecting are set out below.

Name: DR ANGELA ARGENT

Signature: A Argent

Please include my personal information when publishing this submission to your website

***Declaration** : I HAVE NOT made any reportable political donations in the last 2 years.*

Address: 1 MACQUARIE TERRACE

Suburb: BALMAIN Postcode 2041

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director - Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

- The Parramatta Road Urban Transformation project has been put on hold by the NSW Government for a number of reasons, including the uncertainties relating to traffic capacity on Parramatta Road following the construction of WestConnex. To claim this as a benefit is misleading. The project predicts increased traffic congestion on Parramatta Road without the transformation, which clearly is not a benefit, and potentially funnels traffic unable to penetrate the corridor into the privately operated toll road.

- The EIS is a strategy document only. It does not commit to any design, and therefore it doesn't address any local issues which are created by the construction of the M4-M5 link. Its whole purpose is to prepare a legal and bureaucratic pathway for the sale of Sydney Motor Corporation to the private sector thereby removing the Government from the oversight and responsibility for the design and construction. It also endeavours to lock out the public from being able to have any say in what is built, how it is built and where it is built.

- The Rozelle Rail Yard stacks are stated to be 38m high and are situated in a valley area. The majority of Balmain Road is 39m above sea level and Annandale St is at 29m above sea level. Both are considerably less than 1 kilometre from the Rail Yard stacks so pollution will be blown directly into many homes in these areas. This will expose the residents of Annandale, Lilyfield, Rozelle and Balmain to highly increased health risks.

- The Rozelle Rail Yards site is the location of 3 Unfiltered Pollution Stacks. There is a fourth stack on Victoria Rd close to Darling St almost opposite Rozelle Primary School. If the Western Harbour Tunnel is built there will also be a total of 7 Tunnel Portals. Tunnel Portals are also areas of high levels of pollution. It is totally unacceptable that the Pollution Stacks are unfiltered. Recently built tunnels in Tokyo successfully filter 98% of all pollutants. There are at least 5 schools and childcare centres in close proximity to these pollution stacks.

- Noise impacts - Camperdown The EIS indicates that a large number of residents will be affected by construction noise caused by demolition and pavement and infrastructure works. This includes use of a rock breaker and concrete saw. During all periods of construction, there will be noise impacts from construction of site car parking and deliveries and pavement and infrastructure works. No proper mitigation measures are proposed to protect residents from these impacts (10-118, EIS) The EIS admits that three residents and two businesses will be subject to noise impacts above acceptable levels for 16 days (10-119, EIS) No detail is provided as to whether alternative accommodation will be offered or other compensation.

I submit my strongest objections to the M4-M5 Link proposals as contained in the EIS application # SSI 7485, and request the Minister to reject the application and require SMC / RMS to issue a true, not an 'indicative' and fundamentally flawed EIS

Name: Dr ANGELA ARGENT

Signature:

*Please **include** my personal information when publishing this submission to your website*
***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.*

Address: 1 MACQUARIE TERRACE

Suburb: BALMAIN Postcode 2041

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name:
WestConnex M4-M5 Link

- Additional facilities. The EIS states that the contractor may decide upon additional 'construction ancillary facilities' to the 12 identified in the EIS. The EIS should not be approved on the basis that there may be more unidentified sites taken, as residents will have no opportunity to comment on their impacts. The approval condition should limit any construction facilities to those already notified and detailed in the EIS.

- The process that has led to this EIS has been undemocratic and obscure, driven by decisions made behind closed doors.

- The EIS states that darley Road is a contaminated site, and likely has asbestos. The proposal is that 'treated' water will be directly discharged into the stormwater drain at Blackmore oval. There are four long-standing rowing clubs in the vicinity of this location. This plan will jeopardise the integrity of our waterway and compromise the use of the bay for recreational activities for boat and other users. We object in the strongest terms to this proposal on environmental and health reasons. There is no detail of the ongoing Motorway maintenance activities during operation provided in the EIS. The community therefore cannot comment on the impact that this ongoing facility will have on the locality. This component of the EIS should not be approved as this information is not provided and therefore impacts (on parking, safety, noise, amenity of the area) are not known.

- Rozelle is an old and historic suburbs of Sydney. The damage that this project would do in destruction of homes, other buildings and vegetation is unacceptable, especially when the project would leave a legacy of traffic congestion in the area.

- Permanent water treatment plant and substation – Leichhardt The proposal to locate this permanent structure in a residential setting is opposed. The site will have a negative visual impact on the area and is in direct line of sight of a number of homes. If approved, the facility should be moved to the north of the site further from homes.

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: DR ANGELA ARGENT
	Address: 1 MACQUARIE TERRACE
Application Number: SSI 7485	Suburb: BALMAIN Postcode 2041
Application Name: WestConnex M4-M5 Link	Signature:

*Please **include** my personal information when publishing this submission to your website*
***Declaration**: I **HAVE NOT** made any reportable political donations in the last 2 years.*

I object to the whole of the WestConnex Project, and the specific WestConnex M4-M5 Link proposals as contained in the EIS application, for the following reasons, and request the Minister reject the application.

1. The key intersection performance tables in App H (p.258 St Peters and 248 Rozelle) demonstrate that many intersections will either worsen (at the worst case scenario of LOS F) or remain unchanged particularly in 2033, including the following intersections:
   - Princes Highway/Canal Road
   - Princes Highway/Railway Road
   - Unwins Bridge Road/Campbell Street
   - Campbell Road/Bourke Road
   - Princes Highway/Campbell Street
   - Ricketty Street/Kent Road
   - Gardeners Road/Kent Road
   - Gardeners Road/Bourke Road
   - Gardeners Rd/O'Riordan Street
   - Victoria Road/Lyons Road
   - Victoria Road/Darling Street
   - Victoria Road/Robert Street

2. I object to this new tollway because in the past tolls have been justified as needed to pay for the new road. This is not the case of this tollway that will charge tolls for 40 years. This is only to guarantee revenue to the new private owner.

3. The proponent excludes the impact of the Western Sydney Airport from analysis of the project. This could have a significant impact on traffic volumes.

4. The modelling shows significant increases in traffic on Victoria Rd (+20% ADT) which is already at capacity.

5. Most people in Emu Plains, Penrith, Mt Druitt, or Blacktown who work in Sydney CBD use the trains. What workers travelling to Sydney city really need are better and more frequent trains. This is just dismissed by the EIS.

6. Most people in Emu Plains, Penrith, Mt Druitt, or Blacktown who work in Sydney CBD use the trains. What workers travelling to Sydney city really need are better and more frequent trains. This is just dismissed by the EIS.

7. The modelling shows the motorway exceeds reasonable operating limits in the peak in less than ten years.

8. The underlying traffic modelling and outputs was insufficient to:
   - Demonstrate the need for the project.
   - Understand impacts of dispersed traffic on connecting roads, such as the Anzac Bridge, and whether they have available capacity to meet the predicted traffic discharge. Any congestion on exits has the capacity to negate all travel time savings to the exit point, given the small predicted benefits.

9. Public transport is rejected by the EIS so the state government is forcing us to use cars more when most major cities in the world are trying to reduce the number of cars on the roads. We know this is to promote private road operators' profits. I object to putting so much public funding to the cause of private profit. I urge the Secretary of Planning to reject this project.

Submission from:	Submission to:
Name: Maria PEARCY Signature: [signature] *Please **include** my personal information when publishing this submission to your website* ***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.* Address: 62 ROWNTREE ST Suburb: BIRCHGROVE Postcode 2041	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001 Attn: Director – Transport Assessments Application Number: SSI 7485 Application Application Name: WestConnex M4-M5 Link

I submit this objection to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the following reasons, **and ask that the Minister reject the application.**

- Vegetation: Leichhardt. The mature trees on the Darley Road site should be preserved. If any trees are removed during construction it should be a condition of approval that they are replaced with mature trees.

- It is clear that Annandale, Glebe, Rozelle and Lilyfield will be exposed to unacceptable health risks. With four unfiltered emissions stacks in the area plus a large number of exit portals, the residents of this area will suffer greatly from poisonous diesel particulates. This is negligent when you consider that , the World Health Organisation in 2012 declared diesel particulates carcinogenic. " As you are no doubt aware there are at least 5 schools that will be in the orbit of these poisonous fumes and children and the elderly are most at risk to lung ailments. Your Education Minister Rob Stokes declared in 2017, "No ventilation shafts will be built near any school."

- Insufficient time has been given for the community to prepare submissions to the EIS, especially when one considers that whole neighbourhoods affected by the project were not even notified during the concept design period. e.g Newtown, east of King St.

- All of the streets abutting Darley Road identified as NCA 13 (James Street to Falls Street) should have a strict prohibition on any truck movements and worker contractor parking. These homes are already suffering the worst construction impacts of the work on the site and should be spared the further imposition of lack of parking and additional noise impacts. The EIS needs to prohibit outright truck movements (including parking) and worker parking on all of these streets.

- 1.1599 residences or thousands of residents would have noise levels in the evening sufficient to cause sleep disturbance. The technical paper in EIS acknowledges that this is the case, even allowing for acoustic sheds and noise walls. Sleep disturbance has health risks including heightened stress levels and risk of developing dementia. This is simply not acceptable.

- There are overlaps in the construction periods of the New M5 and M4 of up to one year. This will significantly worsen impacts for residents close to construction areas. No additional mitigation or any compensation is offered for residents for these periods.(Executive Summary xxvii). It is unacceptable that residents should have these prolonged periods of exposure to more than one project. The EIS makes no attempt to measure or mitigate the cumulative impact of these prolonged periods of construction noise exposure.

I object to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: Maria Pearcy

Signature: [signature]

*Please **include** my personal information when publishing this submission to your website* ***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.*

Address: 62 ROWNTREE ST

Suburb: BIRCHGROVE NSW Postcode 2041

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

- I am concerned that while the EIS finds that tolls do weigh more heavily on lower income motorists, there is no serious analysis of the blatant unfairness of letting of private consortium toll people for decades in order to pay for less profitable tollways for wealthier communities.

- I am concerned that SMC has selected one of Sydney's most dangerous traffic spots, Darley Rd in Leichhardt for a construction site that will bring hundreds of extra trucks and cars into the area on a daily basis for years.

- Permanent substation and water treatment plant - Residents on Darley Rd opposite the site and residents in Hubert St will have a direct line of site to the Motorway operation infrastructure. The resultant impact is a permanent degradation of the visual environment, is a loss of amenity and is detrimental to the community. This facility should not be permitted in this location and the EIS needs to demonstrate why it is required at this site. If approved, the facility should be moved to the north of the site out of line of site of residents. The residual land should be returned for community purposes, such as green space, with future commercial uses ruled out. If the community is forced to endure 5 years of severe disruptions due to this toll road, the compensation should, at the very least, result in the land being returned to the community as green space.

- Darley Road is confirmed as a 'civil and tunnel site (dive site) with a 'Motorway Operations' site at one end for machinery during the build and will then house permanent water treatment facilities, despite evidence tendered to the Concept Design explaining that this intersection has an high accident rate and is completely unsuitable for such a purpose.

- The traffic around St Peters expected to be heavier because of the increased road access to the new Interchange will adversely affect our community because moving around to our parks and to the shops, to the buses and to the train stations, for pedestrians and cars, will be more difficult. Our community is being sacrificed for the marginal improvement in traffic movement elsewhere in Sydney. No measures to ameliorate the impact are mentioned. This is unacceptable.

- The EIS does not provide any opportunity to comment on the urban design and landscape component of the project. It states that 'a detailed review and finalisation of the architectural treatment of the project operational infrastructure would be undertaken 'during detailed design'. The Community should be given an opportunity to comment upon and influence the design and we object to the approval of the EIS on the basis that this detail is not provided, nor is the community (or other stakeholders) given an opportunity to comment or influence the final design.

- The latest EIS was released just ten business days after feedback period ended for the Concept Design for the M4/M5 and before preliminary drilling to establish a route through the Inner West is completed. WHAT IS THE RUSH? This EIS is little more than a concept design and is far less developed than earlier ones. It is composed of many indicate only plans such that it is impossible to know what the impacts will be and yet approval is being sought in a rush. The EIS ignores more than 1500 submissions, including one of 142 pages from the Inner West Council.

I object to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: Maria Pearcy

Signature: M Lanch-Pearcy

*Please **include** my personal information when publishing this submission to your website* ***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.*

Address: 62 Rowntree St

Suburb: Birchgrove NSW Postcode 2041

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

- Truck routes – Leichhardt: No trucks should be permitted on Darley Road or local roads in Leichhardt or Lilyfield. The EIS proposes that all trucks will arrive at the Darley Road civil and tunnel site from Haberfield and travel along Darley Road to the site, with a right-hand turn now permitted into James Street. The proposed route will result in a truck every 3-4 minutes for 5 years running directly by the small houses on Darley Road. These homes will not be habitable during the five-year construction period due to the unacceptable noise impacts. The truck noise will be worsened by their need to travel up a steep hill to return to the City West Link, so the noise impacts will affect not just those homes on or immediately adjacent to Darley Road. The proposal to run trucks so close to homes is dangerous and there have been two fatalities on Darley Road at the proposed site location. The EIS does not propose any noise or safety barriers to address this. Despite the unacceptable impact to nearby homes, there is no proposal for noise walls, nor any mitigation to individual homes.

- Noise mitigation – Leichhardt. The noise mitigation proposed in the EIS is unacceptable. No detail of noise walls is provided, giving residents no opportunity to comment on whether final impacts are acceptable. This is despite the fact 36 homes are identified in the EIS as severely affected by construction noise. The acoustic shed proposed is of the lowest grade and does not cover the entire site, resulting in noise impacts from the movement of trucks in and out of the tunnel access point. The highest grade acoustic shed should be provided, with the shed covering the entire site. The additional noise mitigation such as noise walls, need to be det out in detail so that residents can properly comment on the impacts.

- I am concerned that the AECOM, the company responsible for the EIS, always approves knocking down heritage buildings if the project requires it. It doesn't how much value it holds for the community, it must always be destroyed.

- The decision to build a three-stage tollway instead of expanding public transport has never been subjected to democratic decision-making and in fact has been opposed by the great majority of submissions received in response to the Environmental Impact Statements for the first two stages.

- I do not accept that King Street traffic congestion will be improved by this project, There should be a complete review of the traffic modelling that does not appear to take sufficient notice of the impact of pouring 51000 extra cars down Euston Rd on top of increases in population in the area. Given that there is no outlet between the St Peters and Haberfield or Rozelle, all traffic going to the CBD, East or into the Inner West will use local roads.

- The proposal for a permanent water treatment plant and substation to the south of the site on Darley Road will prevent direct pedestrian access to the light rail station. It will affect the future uses of the site once the project is completed. The facility is out of step with the area which is comprised of low rise homes and detracts from the visual amenity of the area. This site is a pedestrian hub and will be a visual blight for pedestrians, bike users and the homes that have direct line of sight to the facility. It should not be permitted on this site.

I submit my strongest objections to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: P Mitsou

Signature:

Please **include** my personal information when publishing this submission to your website
Declaration : I **HAVE NOT** made any reportable political donations in the last 2 years.

Address: 465 Balmain Rd

Suburb: Lilyfield Postcode 2040

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name:
WestConnex M4-M5 Link

◊ The Project focuses on 'catering for traffic growth' (P4.15). This contradicts and undermines the NSW Government's Long Term Transport Master Plan and Future Transport web site which commit to an integrated approach to congestion management focussed on land use planning, demand management, public transport investment and "a coherent whole of network planning strategy", essentially aiming for growth in public transport and containing road demand to that required to serve the freight and servicing tasks.

◊ The NSW Government appears to have accepted the project as part of a State Infrastructure Strategy and other plans before a business case was even developed. There was no incentive to explore alternatives or to fully explore the costs and benefits. This process has been described as "lock in". Commitment escalates because a project appears in numerous policy documents. WestConnex is a clear example of government "locking in" commitment before detailed analysis had been undertaken.With the Government fully locked-in to WestConnex, these issues and inadequacies with the Updated Business Case are repeated in the EIS.

◊ SMC have made it extremely difficult for the community to access hard copies of the EIS. The local Glebe library only has one copy and this is the situation at other local libraries. There are very limited hours of access to these locations outside normal working hours. Access to the EIS is very difficult without access to a personal computer. This totally restricts open community engagement.

◊ Crucially, to make the sale more attractive, the tunnels between Haberfield and St Peters will be built independently of the Rozelle Interchange.This is being done to de-risk the project for the private sector sale, as the tunnels can be built using known standards and technology and generate income from January 2023. It would appear that the building of the Rozelle Interchange is so risky that no contractor tendered for the contract in the original tender period.

◊ Noise impacts - Pyrmont Bridge Road site - The EIS indicates that residents will be subjected to severe noise impacts for up to 4 months, caused by the long-term construction work proposed for this site which includes 8 weeks to demolish buildings, followed by 6 weeks to establish construction facilities, with pavement and infrastructure works required (EIS, 10-112) The EIS contains limited mitigation proposed to manage such impacts.

I object to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: Phoebe Mitsu

Signature:

Please include my personal information when publishing this submission to your website
***Declaration**: I HAVE NOT made any reportable political donations in the last 2 years.*

Address: 2/465 Balmain Rd.

Suburb: Lilyfield Postcode 2040

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

- The EIS states that traffic congestion around the St Peters Interchange is expected to be worse after completion of the M5 and the M4-M5 Link particularly in the evening peak hour. The EIS admits that this will have a "moderate negative" impact on the neighbourhood in increasing pollution (also admitted separately) therefore in health impacts, on safety for foot and cycle traffic but also for vehicles and on the local amenity.

- The Darley Road site will not be returned after the project, with a substantial portion permanently housing a Motorways Operations facility which involves a substation and water treatment plant. This means that the residents will not be able to directly access the North Light rail Station from Darley Road but will have to traverse Canal Road and use the narrow path from the side. In addition the presence of this facility reduces the utility of this vital land which could be turned into a community facility. Over the past 12 months community representatives were repeatedly told that the land would be returned and this has not occurred. We also object to the location of this type of infrastructure in a neighbourhood setting.

- It is clear from the EIS that spoil truck movements will not be confined to the City West link. At a community consultation it was revealed that trucks removing spoil at Camperdown would very likely be travelling from the James Craig Rd area and in that case would be using the additional lane on the Crescent and then turning right up Johnston St. This is totally CONTRARY to what concerned residents had been promised would not happen. It is clear that any assurances given to the community in past consultations are totally disregarded without consultation later. This is unacceptable.

- I am concerned that SMC has selected one of Sydney's most dangerous traffic spots, Darley Rd in Leichhardt for a construction site that will bring hundreds of extra trucks and cars into the area on a daily basis for years.

- The latest EIS was released just ten business days after feedback period ended for the Concept Design for the M4/M5 and before preliminary drilling to establish a route through the Inner West is completed. WHAT IS THE RUSH? This EIS is little more than a concept design and is far less developed than earlier ones. It is composed of many indicate only plans such that it is impossible to know what the impacts will be and yet approval is being sought in a rush. The EIS ignores more than 1500 submissions, including one of 142 pages from the Inner West Council.

I object to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: PRISCILLA LEICHHARDT CLARK

Signature:

Please include my personal information when publishing this submission to your website

***Declaration**: I HAVE NOT made any reportable political donations in the last 2 years.*

Address: 5 PERCY ST

Suburb: ROZELLE Postcode 2039

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

⇒ The Darley Road site will not be returned after the project, with a substantial portion permanently housing a Motorways Operations facility which involves a substation and water treatment plant. This means that the residents will not be able to directly access the North Light rail Station from Darley Road but will have to traverse Canal Road and use the narrow path from the side. In addition the presence of this facility reduces the utility of this vital land which could be turned into a community facility. Over the past 12 months community representatives were repeatedly told that the land would be returned and this has not occurred. We also object to the location of this type of infrastructure in a neighbourhood setting.

⇒ I am concerned that SMC has selected one of Sydney's most dangerous traffic spots, Darley Rd in Leichhardt for a construction site that will bring hundreds of extra trucks and cars into the area on a daily basis for years.

⇒ The consultants for the Social and Economic Impact study is HillPDA. This company has a conflict of interest and is not an appropriate choice to do a social impact study of WestCONnex. Amongst its services it offers property valuation services and promotes property development in what are perceived to be strategic locations. HillPDA were heavily involved in work leading to the development of Urban Growth NSW and the heavily criticised Parramatta Rd Study. It is not in the public interest to use public funds on an EIS done by a company that has such a heavy stake in property development opportunities along the Parramatta Rd corridor. One of the advantages of property development along Parramatta Rd that Hill PDA promotes on its website is the 33 kilometre WestCONnex.

⇒ There is a higher than average number of shift workers in the Inner West. The EIS acknowledges that even allowing for mitigation measures such as acoustic sheds and noise walls, shift workers will be more vulnerable to impacts of years of construction work and will consequently be at risk of a loss of quality of life, loss of productivity and chronic mental and physical illness.

I wish to submit my objection to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485. The reasons for objecting are set out below.

Name: PRISCILLA LEIGHTON CLARK

Signature: [redacted]

Please include my personal information when publishing this submission to your website

***Declaration** : I HAVE NOT made any reportable political donations in the last 2 years.*

Address: 5 PERCY ST

Suburb: ROZELLE Postcode: 2039

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

- The Parramatta Road Urban Transformation project has been put on hold by the NSW Government for a number of reasons, including the uncertainties relating to traffic capacity on Parramatta Road following the construction of WestConnex. To claim this as a benefit is misleading. The project predicts increased traffic congestion on Parramatta Road without the transformation, which clearly is not a benefit, and potentially funnels traffic unable to penetrate the corridor into the privately operated toll road.

- The EIS is a strategy document only. It does not commit to any design, and therefore it doesn't address any local issues which are created by the construction of the M4-M5 link. Its whole purpose is to prepare a legal and bureaucratic pathway for the sale of Sydney Motor Corporation to the private sector thereby removing the Government from the oversight and responsibility for the design and construction. It also endeavours to lock out the public from being able to have any say in what is built, how it is built and where it is built.

- The Rozelle Rail Yard stacks are stated to be 38m high and are situated in a valley area. The majority of Balmain Road is 39m above sea level and Annandale St is at 29m above sea level. Both are considerably less than 1 kilometre from the Rail Yard stacks so pollution will be blown directly into many homes in these areas. This will expose the residents of Annandale, Lilyfield, Rozelle and Balmain to highly increased health risks.

- The Rozelle Rail Yards site is the location of 3 Unfiltered Pollution Stacks. There is a fourth stack on Victoria Rd close to Darling St almost opposite Rozelle Primary School. If the Western Harbour Tunnel is built there will also be a total of 7 Tunnel Portals. Tunnel Portals are also areas of high levels of pollution. It is totally unacceptable that the Pollution Stacks are unfiltered. Recently built tunnels in Tokyo successfully filter 98% of all pollutants. There are at least 5 schools and childcare centres in close proximity to these pollution stacks.

- Noise impacts – Camperdown The EIS indicates that a large number of residents will be affected by construction noise caused by demolition and pavement and infrastructure works. This includes use of a rock breaker and concrete saw. During all periods of construction, there will be noise impacts from construction of site car parking and deliveries and pavement and infrastructure works. No proper mitigation measures are proposed to protect residents from these impacts (10-118, EIS) The EIS admits that three residents and two businesses will be subject to noise impacts above acceptable levels for 16 days (10-119, EIS) No detail is provided as to whether alternative accommodation will be offered or other compensation.

Submission from:	Submission to:
Name: Julie Sheridan Signature: Julie Sheridan *Please **include** my personal information when publishing this submission to your website* ***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.* Address: 4 Miller Street Suburb: Drummoyne Postcode 2047	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001 Attn: Director – Transport Assessments Application Number: SSI 7485 Application Application Name: WestConnex M4-M5 Link

I submit this objection to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the following reasons, **and ask that the Minister reject the application.**

i. Table 6.1 in Appendix Q (Social and Economic impact) is not an accurate report on the concerns of residents. It downplays concerns of Newtown, St Peters and Haberfield residents. It does not even mention concerns about additional years of construction in Haberfield and St Peters. The raises the question of whether this is a result of the failure of SMC to notify impacted residents including those on the Eastern Side of King Street and St Peters about the potential impacts of the M4 M5

ii. The impact of the project on cycling and walking will be considerable around construction sites. The promise of a construction plan is not sufficient. There has not been sufficient consultation or warning given to those directly affected or interested organisations. There needs to be a longer period of consultation so that the community can be informed about the added dangers and inconvenience, especially when you consider that it is over a 4 year period.

iii. I am appalled to read in the EIS that more than 100 homes across the Rozelle construction sites will be severely affected by construction noise for months or even years at a time. This would include hundreds of individual residents including young children, school students and people who spend time at home during the day. The predicted levels are more than 75 decibels and high enough to produce damage over an eight hour period. Such noise levels will severely impact on the health, capacity to work and quality of life of residents. NSW Planning should not give approval to a project that could cause such impacts. Promises of potential mitigation are not enough, especially when you consider the ongoing unacceptable noise in Haberfield during the M4East construction.

iv. I am completely opposed to approving a project in which the Air quality experts recommend rather than filtrating stacks extra stacks could be added later.

v. The EIS acknowledges that extra construction traffic will add to travel times across the Inner West and have a negative impact on businesses in the area. No compensation is suggested. These impacts are not been taken into account of evaluating the cost of WestCONnex.

Submission from:	Submission to:
Name: Matthew Taber Signature: M Taber *Please **include** my personal information when publishing this submission to your website* ***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.* Address: 72 Johnston St Suburb: Annandale Postcode 2038	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001 Attn: Director – Transport Assessments Application Number: SSI 7485 Application Application Name: WestConnex M4-M5 Link

I submit my objection to the WestConnex M4-M5 Link as contained in the EIS application # SSI 7485, for the following reasons, **and ask that the Minister reject the application and require preparation of a genuine, not indicative, EIS**

- *Stage 3 is the most complex and expensive stage of WestConnex, yet there are no detailed construction plans. It is not enough to say there will be mitigation if negative impacts unfold. An EIS should assess risks and be able to predict whether they are worth risking and if so, what mitigation should be necessary.*

- *I do not accept the finding in the Appendix P that there will be no noise exceedences during construction at Campbell Rd St Peters. There has been terrible noise during the early construction of the New M5. Why would this stop, especially given the construction is just as close to houses? Is it because the noise is already so bad that comparatively it will not be that much worse. This casts doubt on the whole noise study.*

- *The EIS claims to have saved Blackmore Park and Easton Park due to negative community feedback. I am concerned that this is a false claim and that this site was never really in contention due to other physical factors. I would like NSW Planning to investigate whether this claim is correct to have heeded the community is false or not.*

- *The EIS acknowledges that visual impacts will occur during construction. However it does not propose to address these negative impacts in the design of the project. This is unacceptable and the EIS needs to propose walls,, plant and perimeter treatments and other measures at appropriate locations to lessen the impact on visual amenity. (Executive Summary xviii)*

- *Motor vehicles account for 14% of Particulate Pollution of 2.5 microns and less in Australia. There is no safe level to exposure to particulate matter of 2.5 microns and less. Particulate matter is linked with Asthma, Lung Disease, Cancer and Stroke.*

- *The Rozelle and Iron Cove interchanges are not to meet the project objective of linking M4 East and New M5 (Part 3.3 of EIS) and should not be included in the Project. Existing motorways (Cross City Tunnel and Eastern Distributor) would provide suitable road capacity to avoid the city centre.*

- *The Western Sydney Airport is due to commence construction next year with completion in 2026. Demand for air travel in Sydney is set to double over the next 20 years. Initial patronage is said to be 10 million passengers per year. Information should be provided demonstrating how (or whether) the project caters for travel to the new airport and the likely lessening of demand to the current monopoly airport.*

- *It all very difficult for the community to access hard copies of the EIS outside normal working and business hours. The Newtown Library only has one copy of the EIS, and has extremely limited opening hours. This restricted access does NOT constitute open and fair community engagement.*

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: MILENA SCEMC
	Address: 24/9 HELENA ST.
Application Number: SSI 7485	Suburb: LILYFIELD Postcode 2040
Application Name: WestConnex M4-M5 Link	Signature:

Please include my personal information when publishing this submission to your website
Declaration: I HAVE NOT made any reportable political donations in the last 2 years

I object to the whole of the WestConnex Project, and the specific WestConnex M4-M5 Link proposals as contained in the EIS application, for the following reasons:

◊ The EIS states that 'reasonable and feasible work practices and mitigation measures would be implemented to minimise potential noise impacts due to activities occurring at the Darley Road civil and tunnel site.' 96-52) This is not good enough. The EIS does not contain any detail whatsoever of these proposal on which they can comment. In addition, there is no requirement that measures will in fact be introduced to address noise impacts. The approval conditions need to contain detail of specific noise mitigation measures that are mandated and can be enforced.

◊ Leichhardt residents were repeatedly told by SMC that the Darley Road site would be operational for three years. The EIS states that it will be operational for 5 years. This creates an unacceptable impact for residents. The works on the site should be restricted to a three-year program as was promised.

◊ The volume of extra heavy traffic in the Rozelle area and the acknowledged impact this will have on local roads is completely unacceptable to me.

◊ Table 6.1 in Appendix Q (Social and Economic impact) is not an accurate report on the concerns of residents. It downgrades the concerns of Newtown, St Peters and Haberfield residents. It does not even mention concerns about additional years of construction in Haberfield and St Peters. It also does not mention concerns about heritage impacts in Newtown. I can only assume that this is because there was almost no consultation in Newtown and a failure to notify impacted residents including those on the Eastern Side of King Street and St Peters.

◊ Heavy vehicle movements during peak hours – Leichhardt. The EIS states that 'reasonable and practical management strategies would be investigated to minimize the volume of heavy vehicle movements during peak hours.' (8-53). This is also not acceptable as it is not known what will actually be done to manage this impact. It is not good enough for the EIS, which forms the basis of the approval of this project, to simply mention 'investigations' and not detail a proper plan (on which residents can comment) on management of heavy vehicle movements during peak hours. In addition, Darley Road is very congested from 7am until 9.30am and then from 4pm-6.30pm, well outside the 'peak' periods identified in the EIS. And the impact on traffic will be caused by 'light' vehicles and not simply heavy vehicles. It is clear that there is no plan for managing these vehicle movements. The EIS should not be approved as drafted. It is unacceptable for this volume of vehicles to be proposed for this critical arterial road with no plan for management

I wish to submit my objection to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485. The reasons for objecting are set out below.

Name: JUDY RUMER

Signature: Judy Rumer

Please include my personal information when publishing this submission to your website

Declaration : I HAVE NOT made any reportable political donations in the last 2 years.

Address: 3/2 MUSGRAVE ST

Suburb: MOSMAN Postcode: 2088

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

- The Rozelle Rail Yard stacks are stated to be 38m high and are situated in a valley area. The majority of Balmain Road is 39m above sea level and Annandale St is at 29m above sea level. Both are considerably less than 1 kilometre from the Rail Yard stacks so pollution will be blown directly into many homes in these areas. This will expose the residents of Annandale, Lilyfield, Rozelle and Balmain to highly increased health risks.

- The proposed work hours for the Rozelle Rail Yards Site are tunnelling and spoil handling 24 hours a day seven days a week. On ground construction Mon-Fri 7.00am – 6.00pm, Sat 8.00am- 1.00pm. However as has been experienced by those at Haberfield and St Peters these hours and especially late and night work have been extended and implemented when the schedules have fallen behind and this has lead to great physical and mental stress for many residents through interrupted sleep and loss of sleep especially for those with children. The roads and sites at night in the area will see a marked increase in noise from truck movements, truck reversing alarms and running machinery. It will also see a marked increase in light during the night hours with site illumination and vehicle head lights as has been experienced in other areas. These problems have not been addressed in the EIS.

- The Rozelle Rail Yards site is the location of 3 Unfiltered Pollution Stacks. There is a fourth stack on Victoria Rd close to Darling St almost opposite Rozelle Primary School. If the Western Harbour Tunnel is built there will also be a total of 7 Tunnel Portals. Tunnel Portals are also areas of high levels of pollution. It is totally unacceptable that the Pollution Stacks are unfiltered. Recently built tunnels in Tokyo successfully filter 98% of all pollutants. There are at least 5 schools and childcare centres in close proximity to these pollution stacks.

- Noise impacts - Camperdown The EIS indicates that a large number of residents will be affected by construction noise caused by demolition and pavement and infrastructure works. This includes use of a rock breaker and concrete saw. During all periods of construction, there will be noise impacts from construction of site car parking and deliveries and pavement and infrastructure works. No proper mitigation measures are proposed to protect residents from these impacts (10-118, EIS) The EIS admits that three residents and two businesses will be subject to noise impacts above acceptable levels for 16 days (10-119, EIS) No detail is provided as to whether alternative accommodation will be offered or other compensation.

I object to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: EMMA ELDER

Signature:

*Please **include** my personal information when publishing this submission to your website*
***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.*

Address: 20 PYRMONT BRIDGE RD

Suburb: CAMPERDOWN Postcode 2050

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

◊ I am concerned that while the EIS finds that tolls do weigh more heavily on lower income motorists, there is no serious analysis of the blatant unfairness of letting of private consortium toll people for decades in order to pay for less profitable tollways for wealthier communities.

◊ EIS 6.1 (Synthesis, Page 45) states. "..... this may result in changes to both the project design and the construction methodologies described and assessed in this EIS. Any changes to the project would be reviewed for consistency with the assessment contained in the EIS including relevant mitigation measures, environmental performance outcomes and any future conditions of approval". It is unstated just who would have responsibility for such a "review(ed) for consistency", and how these changes would be communicated to the community. The EIS should not be approved till significant 'uncertainties' have been fully researched and surveyed and the results (and any changes) published for public comment (ie : the Sydney Water Tunnels issues at 12-57)

◊ The EIS states that property damage due to ground movement may occur. We object to the project in its entirety on this basis. The EIS states that 'settlement, induced by tunnel excavation, and groundwater drawdown, may occur in some areas along the tunnel alignment'. The risk of ground movement is lessened where tunnelling is more than 35 metres. However, some tunnelling is at less than 10 metres. This proposed tunnel alignment creates an unacceptable risk of ground movement. In addition, the EIS states that there are a number of discrete areas to the north and northwest of the Rozelle Rail Yards, to the north of Campbell Road at St Peters and in the vicinity of Lord Street at Newtown where ground water movement above 20 milliliters is predicted 'strict limits on the degree of settlement permitted would be imposed on the project" and 'damage' would be rectified at no cost to the owner. would be placed (Executive Summary, xvii - iii). The project should not be permitted to be delivered in such a way that there is a known risk to property damage that cannot be mitigated to an acceptable level of risk.

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: EMMA ELDER
	Address: 20 PYRMONT BRIDGE RD
Application Number: SSI 7485	Suburb: CAMPERDOWN Postcode 2050
Application Name: WestConnex M4-M5 Link	Signature:

*Please **include** my personal information when publishing this submission to your website*
***Declaration**: I **HAVE NOT** made any reportable political donations in the last 2 years.*

I object to the whole of the WestConnex Project, and the specific WestConnex M4-M5 Link proposals as contained in the EIS application, for the following reasons, and request the Minister reject the application.

- *The M4-M5 Link enables the expansion of the WestConnex network to include the Western Harbour Tunnel, Beaches Link and M6. These motorway projects, were not part of the WestConnex business case and are not priority projects in any State or Federal roads plan.*

- *The business case is fatally flawed in a number of ways :*
  - *It does not factor in the impact of longer total journey lengths on urban sprawl, which will have a flow-cost for infrastructure and servicing.*
  - *It includes benefits from WestConnex supporting more compact commercial land use when this is generally not the result of motorway investment, and is unlikely to be in the area served by Stage 3.*
  - *It does not attempt to cost the reductions in public transport, especially the loss of fare revenue.*
  - *Ancillary road projects necessitated by WestConnex, such as the potentially $1BN Alexandria-Moore Park Connectivity Upgrade, should have been included in the Business Case.*
  - *Impact on property values, costs of noise during construction, and loss of business should all have been costed and included in the Business Case*
  - *Loss of heritage to the whole community (not just property owners) should have been included in the Business Case.*

- *The Government is spending many billions of taxpayer dollars via Metro Rail to try and free itself of the restrictions of the City Circle that imposes a choke on the whole rail network, but is now replicating a the city circle with a 60km road network. It does makes sense to focus a rail network on the centre of the densest employment and residential area of Australia, with the greatest economic output per square kilometre. However, it is the antithesis of common sense, practicality, economic productivity, property value creation, environmental planning, social planning and basic transport planning to replicate it with more motorways.*

- *The Business Case for the WestConnex project (made up of the New M4, Iron Cove Link and Rozelle Interchange, M4-M5 Link, New M5, King Georges Road Interchange upgrade and Sydney Gateway was not adequate to justify moving to environmental impact assessment.*

Submission from:	Submission to:
Name: EMMA ELDER	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature:	
*Please **include** my personal information when publishing this submission to your website* ***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.*	Attn: Director – Transport Assessments
Address: 20 PYRMONT BRIDGE RD	Application Number: SSI 7485 Application
Suburb: CAMPERDOWN Postcode: 2050	Application Name: WestConnex M4-M5 Link

I submit my objection to the WestConnex M4-M5 Link as contained in the EIS application # SSI 7485, for the following reasons, **and ask that the Minister reject the application and require preparation of a genuine, not indicative, EIS**

◊ Because this is still based on a "concept design" it is unknown how the communities affected will not know what is being done below their residences, schools, business premises and public spaces, particularly if the whole project is sold into a private corporation's ownership before the actual designs and construction plans are determined. The EIS makes references to these designs and plans being reviewed but there is **NO** information as to what agency will be responsible for such reviews or whether the outcomes of such reviews will be made public. The communities below whose homes, business premises, public buildings and public spaces this massive project will be excavated and built will be completely in the dark about what is being done, what standards it is supposed to comply with, what inspection or scrutiny it will subject to, and whether the private corporations undertaking the work will be held to any liability by our government.

◊ The EIS permits trucks to access local roads in exceptional circumstances which includes queuing at the site. Given the constraints of the Darley Road site queuing will be the usual situation. The EIS needs to be amended to remove queuing as an exceptional circumstance. The truck movements should properly managed by the contractor so that there is no queuing. This exception will make it easier for contractors to neglect their obligation to monitor and manage truck movements in and out of the site and needs to be removed. The EIS needs to specifically mention all local streets abutting Darley Road and expressly prohibited truck movements (including parking) on these streets. This should include all streets from the north (James St) to the south (Falls Road), which are near the project footprint.

◊ Streets in Haberfield would be subject to heavy vehicle traffic for a further four years, making at least 7 years of heavy impacts on a single suburb. The answer is not a 'community strategy'. Residents who believed that their pain would be over after the M4 east are now being asked to sustain a further four years of impacts. No compensation or serious mitigation is suggested.

◊ The EIS states that investigation would be undertaken to confirm whether the Victoria Road bridge is a potential roost site for microbats. There will be attempts to 'manage potential impacts' if confirmed. This is inadequate. The project should not be permitted to impact on vulnerable species.

◊ I do not accept the finding in the Appendix P that there will be no noise exceedences during construction at Campbell Rd St Peters. There has been terrible noise during the early construction of the New M5. Why would this stop, especially given the construction is just as close to houses? Is it because the noise is already so bad that comparatively it will not be that much worse. This casts doubt on the whole noise study.

I submit my strongest objections to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: Jan Wells

Signature: J Wells

Please **include** my personal information when publishing this submission to your website
Declaration : I **HAVE NOT** made any reportable political donations in the last 2 years.

Address: 241 Annandale St

Suburb: Annandale Postcode 2038

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name:
WestConnex M4-M5 Link

◊ It is clear that Annandale, Glebe, Rozelle and Lilyfield will be exposed to unacceptable health risks. With four unfiltered emissions stacks in the area plus a large number of exit portals, the residents of this area will suffer greatly from poisonous diesel particulates. This is negligent when you consider that, the World Health Organisation in 2012 declared diesel particulates carcinogenic. " As you are no doubt aware there are at least 5 schools that will be in the orbit of these poisonous fumes and children and the elderly are most at risk to lung ailments. Your Education Minister Rob Stokes declared in 2017, "No ventilation shafts will be built near any school."

◊ Where is the commitment to community consultation and to long term planning when the EIS for the M4/M5 Link is released before any response to the extensive community feedback on the M4-M5 Link concept design could possibly have been seriously considered. This demonstrates deep government contempt for the people of NSW and the communities of the Inner West of Sydney in particular.

◊ No workers associated with the WestConnex project should be permitted to park on local streets. Parking is at a premium in this area and many residents to not have off-street parking. The removal of 20 car spaces for five years as is proposed on Darley Road will worsen this situation as will the removal of 'kiss and ride facilities' at the light rail. There is also a pre-DA application for 120 units on William Street which is not taken into account in the EIS. This will place further stress on parking. The EIS needs to outright prohibit any worker parking on local streets.

◊ The impact of the project on cycling and walking will be considerable around construction sites. The promise of a construction plan is not sufficient. There has not been sufficient consultation or warning given to those directly affected or interested organisations. There needs to be a longer period of consultation so that the community can be informed about the added dangers and inconvenience, especially when you consider that it is over a 4 year period.

◊ In the EIS there are indications of what is to be expected in the Rozelle Rail Yards construction site and the Crescent Civil site. But the EIS states that only after Construction Contractors have been engaged would project designs and methodologies be finally worked out and agreed. This may result in major changes to the project design and construction methodologies. The community will have no input into this process, so the community is totally powerless to be able to comment on what will actually be proposed, how it will be carried out and what will finally be built. This is not acceptable.

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: Ian Webb Address: 241 Annandale St
Application Number: SSI 7485	Suburb: ANNANDALE Postcode 2038
Application Name: WestConnex M4-M5 Link	Signature: [signature]

*Please **include** my personal information when publishing this submission to your website*
***Declaration**: I **HAVE NOT** made any reportable political donations in the last 2 years.*

I object to the whole of the WestConnex Project, and the specific WestConnex M4-M5 Link proposals as contained in the EIS application, for the following reasons, and request the Minister reject the application.

- The increased amount of traffic the M4-M5 Link will dump on the roads to and from the St Peters, Haberfield and Rozelle Interchanges will disrupt local transport networks including bus and active transport (walking and cycling)

- There are overlaps in the construction periods of the New M5 and M4 of up to one year. This will significantly worsen impacts for residents close to construction areas. No additional mitigation or any compensation is offered for residents for these periods.(Executive Summary xxvii). It is unacceptable that residents should have these prolonged periods of exposure to more than one project. The EIS makes no attempt to measure or mitigate the cumulative impact of these prolonged periods of construction noise exposure.

- Out of hours work - Pyrmont Bridge Road site - Up to 14 'receivers' at this site are predicted to have impacts from high noise impacts during out of hours work for construction and pavement works for approximately 2 weeks caused by the use of a rock-breaker. Again, no plans to relocate or compensate residents affected is provided in the EIS (EIS, XV) The only mitigation contained in the EIS is that the use of the road profiler is to be limited during out of hours works 'where feasible.' (Table 5-120) In other words, there is no mitigation whatsoever for residents affected by daytime noise and a possibility that they will be similarly affected out of hours where the contractor considers that it isn't feasible to limit the use of the road profiler. This represents an inadequate response to managing these severe noise impacts for residents.

- Targets for renewable energy and offsets are unclear

- Noise from trucks entering and exiting the site - Pyrmont Bridge Road site - The EIS states that there will be noise 'exceedances' for trucks entering and exiting the site (Table 5-120) No detail is provided as to the level of any such 'exceedance'. Nor does it propose any mitigation other than investigations into 'locations' where hoarding above 2 metres can be utilized to control trucks in the queuing area. This does not result in any firm plans to manage the noise. Nor is enough detail provided so that those affected can comment on the effectiveness of this proposed mitigation measure

- Increased traffic on Bridge Road, Wattle Street and the Western Distributor will reduce the amenity and value of the investment in the renewal of the Fish Markets and renewal of the Bays Market District

- Despite the promise of the WestConnex business case, Parramatta Road remains a barrier to urban revitalisation. There is no discussion of this commitment in the EIS.

Attention Director
Application Number: SSI 7485

Infrastructure Projects, Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001
Application Name:
WestConnex M4-M5 Link

Name: Petra Becker

Signature: .....

Please include my personal information when publishing this submission to your website. I HAVE NOT made reportable political donations in the last 2 years.

Address: 49 Percival St.

Suburb: City Hall *Postcode* 2048

I submit my objection to the WestConnex M4-M5 Link proposals for the reasons stated below, and request the Minister reject the application entirely, and cause the proponents to reissue an EIS that is based on a fully researched, developed, and budgeted concept design, and require the proponents to prepare a new business case against that design.

- Rozelle Rail Yards and Rozelle Civil Site.It is clear that the most highly affected area of Stage 3 will be the Rozelle area and the massive and hugely complex Rozelle interchange. The suggestion that Westconnex is capable of building this is highly questionable. Nothing like this has been built anywhere else in the World. Considering the simple problems of dust management, noxious gasses and the handling of toxic materials like asbestos that have been so inappropriately dealt with on Stages 1 and 2 by Westconnex this intersection of Stage 3 is a disaster waiting to happen and should definitely not be allowed to proceed without a massive investigation. What has been shown in the EIS is totally inadequate for this project to be allowed to proceed.

- Human health risk (Executive Summary xvi) - The EIS states that there may be a 'small increase in pollutant concentrations' near surface roads.The EIS states that potential health impacts associated with changes in air quality (specifically nitrogen dioxide and particulates) within the local community have been assessed and are considered to be 'acceptable.' We disagree that the impacts on human health are acceptable and object to the project in its entirety because of these impacts.

- Truck routes – Leichhardt: No trucks should be permitted on Darley Road or local roads in Leichhardt or Lilyfield. The EIS proposes that all trucks will arrive at the Darley Road civil and tunnel site from Haberfield and travel along Darley Road to the site, with a right-hand turn now permitted into James Street. The proposed route will result in a truck every 3-4 minutes for 5 years running directly by the small houses on Darley Road. These homes will not be habitable during the five-year construction period due to the unacceptable noise impacts. The truck noise will be worsened by their need to travel up a steep hill to return to the City West Link, so the noise impacts will affect not just those homes on or immediately adjacent to Darley Road. The proposal to run trucks so close to homes is dangerous and there have been two fatalities on Darley Road at the proposed site location. The EIS does not propose any noise or safety barriers to address this. Despite the unacceptable impact to nearby homes, there is no proposal for noise walls, nor any mitigation to individual homes.

- At the western end of Bignell Lane near Pyrmont Bridge Road existing flood depth was identified up to one metre in the 100 year ARI. The NSW Government Floodplain Development Manual (2005) identifies this location as a high flood hazard area.

Submission to : Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001 **Attention: Director – Transport Assessments** **Application Number: SSI 7485** **Application Name: WestConnex M4-M5 Link**	**Name:** HELEN REYNOLDS **Signature:** [signature] *Please Include my personal information when publishing this submission to your website* *Declaration : I HAVE NOT made any reportable political donations in the last 2 years.* **Address:** 18 Red Lion St **Suburb:** Rozelle **Postcode** 2039

I submit this objection to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the following reasons, and ask that the Minister reject the application

1. The EIS states "Direct and indirect traffic disruptions are likely to be experienced on local and arterial roads in most suburbs that are in close proximity to construction sites. This would include the suburbs of Ashfield, Haberfield, St Peters, Camperdown, Annandale, Lilyfield, Leichhardt, and Rozelle." Despite this finding, the study then pushes these negative impacts aside as inevitable. There is never any evaluation of whether in the light of the negative impacts an alternative public infrastructure project might be preferable

2. Daytime noise at 177 properties across the project is predicted to be so bad during the years of construction that extra noise treatments will be required. The is however a caveat - the properties will change if the design changes. My understanding is that the design could change without the public being specifically notified or given the chance for feedback. This means that there is a possibility of hundreds of residents being severely impacted who are not even identified in this EIS. I find this completely unacceptable.

3. I object to the publication of this EIS only 14 days after the final date for submission of comments on the concept design. At the time this EIS was approved for publication, there had been no public response to the public submissions on the design. It was not possible that the community's feedback was considered let alone assessed before the EIS model was finalised. The rushed process exposes the fundamental lack of integrity in the feedback process and treats the community with contempt.

4. Many students walk or ride to Orange Grove and Leichhardt Secondary College schools via Darley Road.There are also a number of childcare centres very close to the Darley Road site.

5. No road junction as large and complex as the extraordinary spaghetti junction proposed to go underground has been built anywhere in the world. The feasibility is not tested. There are no international or national standards for such a construction.

6. Rozelle is an old and historic suburbs of Sydney. The damage that this project would do in destruction of homes, other buildings and vegetation is unacceptable, especially when the project would leave a legacy of traffic congestion in the area.

7. Streets in Haberfield would be subject to heavy vehicle traffic for a further four years, making at least 7 years of heavy impacts on a single suburb. The answer is not a "community strategy'. Residents who believed that their pain would be over after the M4 east are now being asked to sustain a further four years of impacts. No compensation or serious mitigation is suggested.

Attention Director
Application Number: SSI 7485

Infrastructure Projects, Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Application Name: WestConnex M4-M5 Link

Name: HELEN REYNOLDS

Signature: [signature]

Please include my personal information when publishing this submission to your website.
~~I HAVE NOT~~ made reportable political donations in the last 2 years.

Address: 18 Red Lion St

Suburb: Rozelle *Postcode* 2039

I object to the WestConnex M4-M5 Link proposals for the following reasons:

1. I object to the issue of this EIS only 14 days after the period for submission of comments on the concept design closed. There is no public response to the 1,000s of comments made on the design and it seems impossible that the comments could have been reviewed, assessed and responses to them incorporated into the EIS in that time. This casts doubt over the integrity of the entire EIS process.

2. Research about roads clearly demonstrates that roads create congestion. The WestConnex project is no different and the EIS clearly indicates that this is an impact of the M4/M5 and the consequent roads that will follow. WHERE WILL THIS END AS THE m4/m5 Link EIS itself indicates the RMS is already hard at work considering how to solve these problems – of congestion caused by roads.

3. It has estimated that if construction goes ahead, some homes in Darley St Leichhardt will have a truck on average every 4 minutes just metres from their bedrooms. If experience in Haberfield, Kingsgrove, St Peters and Alexandria is anything to go by, residents can again expect the actual experience to be worse than predicted by the EIS. HOW IS THIS POSSIBLE? why have the serious and legitimate concerns raised by the residents not even been acknowledged.

4. The substation and water treatment plant should be moved to the north end of the site near the City West link. This will mean that the site is less visible to residents and most pedestrian access is at this end. There are no homes that will have direct line of site of the facility if it is moved. This will also enable direct pedestrian access to the light rail without the need to use the winding path at the rear of the site which creates safety issues and adds to the time required to access the light rail stop.

5. The warm and caring words contained in the EIS, ref Sustainability Management Strategy, have not been reflected in the wanton destruction of homes, trees and habitat already. Why should we believe them?

6. I am concerned that while the EIS finds that tolls do weigh more heavily on lower income motorists, there is no serious analysis of the blatant unfairness of letting of private consortium toll people for decades in order to pay for less profitable tollways for wealthier communities.

7. We object to the selection of the Darley Road site on the basis that it provides for daily movements of 170 heavy and light vehicles accessing Darley Road. This creates an unacceptable risk to the safety of pedestrians accessing the North Leichhardt light rail stop as well as bicycle users accessing the bicycle route on Darley Road and entering Canal road to join the dedicated bike paths on the bay run. Many school children cross at this point to walk to Orange Grove and Leichhardt Secondary College. The EIS states that an alternative truck movement is proposed which involves use of the City West Link with no trucks to access Darley Road. The selection of Darley Road should not be approved if it involves any truck movements on Darley Road, which is what it currently provides.

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: HELEN REYNOLDS
	Address: 18 Red Lion St
Application Number: SSI 7485	Suburb: Rozelle Postcode 2039
Application Name: WestConnex M4-M5 Link	Signature:
Please include my personal information when publishing this submission to your website Declaration: I HAVE NOT made any reportable political donations in the last 2 years	

I object to the whole of the WestConnex Project, and the specific WestConnex M4-M5 Link proposals as contained in the EIS application, for the following reasons:

I. *I am very concerned by the finding that 162 homes and hundreds of individual residents including young children, students and people at home during the day will be highly affected by construction noise. These homes are spread across all construction sites. The predicted levels are more than 75 decibels and high enough to produce damage over an eight hour period. Such noise levels will severely impact on the health, capacity to work and quality of life of residents.NSW Planning should not give approval for this, especially based on the difficulties residents near M4 East, M4 Widening and New M5 residents have experienced in achieving notification and mitigation M4 east and New M5. A promise of some future plan to mitigate by a construction company yet to be nominated is certainly not sufficient.*

II. *The EIS states that spoil haulage hours will be restricted but ignores the fact that the same was promised for the M4 East but these promises have been ignored repeatedly.*

III. *The business case for the project in all three stages has failed to taken into account the external costs of these massive road projects in air pollution for human and environmental health, in adding fossil fuel emissions to increase global warming effects, and in the economic and social costs of the disruption to human activities, of displacement of people and businesses and of the destruction of community cohesion and amenity. These external costs far outweigh any benefits from building roads which poorly serve people's transport needs but instead enrich private corporations.*

IV. *The EIS lacks sufficient focus on traffic congestion in the suburbs of Alexandria and Erskineville. Are these being ignored because they will be even more congested than currently.*

V. *The EIS states that, if the current proposal for ventilation facilities do not manage to achieve satisfactory environmental and health impacts, that further ventilation facilities may be proposed. This is unacceptable and the EIS does not provide the alternative locations for any such facilities and therefore the community is deprived of any opportunity to comment on their impacts. The EIS should not be approved on the basis that there may be additional ventilation facilities that are not disclosed in the EIS.*

VI. *It is clear that the tunnel portals will be major sites for more traffic congestion. Some intersections that are currently very congested will be just as bad in 2033.*

VII. *Leichhardt residents were repeatedly told by SMC that the Darley Road site would be operational for three years. The EIS states that it will be operational for 5 years. This creates an unacceptable impact for residents. The works on the site should be restricted to a three-year program as was promised.*

VIII. *The volume of extra heavy traffic in the Rozelle area and the acknowledged impact this will have on local roads is completely unacceptable to me.*

Submission from:	Submission to:
Name: M ELY	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature: CM CELY	
*Please **include** my personal information when publishing this submission to your website* ***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.*	Attn: Director – Transport Assessments
Address: 64 Campbell ST	Application Number: SSI 7485 Application
Suburb: Balmain Postcode 2041	Application Name: WestConnex M4-M5 Link

I submit this objection to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the following reasons, **and ask that the Minister reject the application.**

i. The site should be returned to the community as compensation for the imposition of this construction site in our neighbourhood for a 5 year period. If the substation and water treatment plant is moved to the north of the site, then the lower half of the site (which is the most accessible end) could be converted into open space with mature trees planted. As this site is immediately adjacent to the bay run, bicycle parking and other facilities that support active transport could be included. This would result increase the green space for residents and result in a pleasant green environment for pedestrians, rather than a fenced facility.

ii. Why the so called 'King Street Gateway' been excluded in the analysis of cumulative impacts of other projects ?

iii. I am concerned that the AECOM, the company responsible for the EIS, always approves knocking down heritage buildings if the project requires it. It doesn't how much value it holds for the community, it must always be destroyed.

iv. No workers associated with the WestConnex project should be permitted to park on local streets. Parking is at a premium in this area and many residents to not have off-street parking. The removal of 20 car spaces for five years as is proposed on Darley Road will worsen this situation as will the removal of 'kiss and ride facilities' at the light rail. There is also a pre-DA application for 120 units on William Street which is not taken into account in the EIS. This will place further stress on parking. The EIS needs to outright prohibit any worker parking on local streets.

v. The additional unfiltered exhaust stack on the north-west corner of the interchange will further increase the vehicle pollution in an area where the prevailing south and north-westerly winds will send that pollution over residences, schools and sports fields. The St Peters Primary School in particular will be at the apex of a triangle between the two exhaust stacks on the south–western and north-western corners of the interchange. This is utterly unacceptable.

vi. I oppose the destruction of any more of Sydney's heritage for WestCONnex. I am appalled that Sydney Motorway Corporation is seeking approval to tunnel under hundreds of highly valued heritage buildings in Newtown without any serious assessment of risk at all. This heritage belongs to all of Sydney.

vii. A lot of work has gone into building cycling and pedestrian routes in Rozelle and Annandale. Interference and disruption of routes for four years is not a 'temporary' imposition.

Submission to : Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	**Name:** PETER SUTHERLAND
	Signature: P. Sutherland
Attention: Director – Transport Assessments	***Please Include my personal information when publishing this submission to your website***
Application Number: SSI 7485	***Declaration : I HAVE NOT made any reportable political donations in the last 2 years.***
Application Name: WestConnex M4-M5 Link	**Address:** 137 VICTORIA ST
	Suburb: ASHFIELD **Postcode** 2131

I submit this objection to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the following reasons, and ask that the Minister reject the application

⇒ **I am appalled to learn that more than 100 homes including hundreds of residents will be affected by noise exceedences 'out of hours' in the vicinity of Darley Road, Leichhardt. This will not just be for a few days but could continue for years. Such impacts will severely impact on the quality of life of residents.**

⇒ **This EIS contains no meaningful design and construction details and no parameters as to how broad changes and therefore impacts could be. It therefore fails to allow the community to be informed about and comment on the project impacts in a meaningful way.**

⇒ **The EIS at 7-25 refers to 876 comments (limited to 140 characters) made via the collaborative map on the Concept Design 'up to July' that were considered in the preparation of the EIS. It does not mention the many hundreds of extended written submissions that were lodged in late July and early August. These critical 'community engagement' feedback submissions have clearly not been considered in the preparation of the EIS. This casts doubt over the integrity of the entire EIS process.**

⇒ **The EIS states "Direct and indirect traffic disruptions are likely to be experienced on local and arterial roads in most suburbs that are in close proximity to construction sites. This would include the suburbs of Ashfield, Haberfield, St Peters, Camperdown, Annandale, Lilyfield, Leichhardt, and Rozelle." Despite this finding, the study then pushes these negative impacts aside as inevitable. There is never any evaluation of whether in the light of the negative impacts an alternative public infrastructure project might be preferable**

⇒ **Daytime noise at 177 properties across the project is predicted to be so bad during the years of construction that extra noise treatments will be required. The is however a caveat - the properties will change if the design changes. My understanding is that the design could change without the public being specifically notified or given the chance for feedback. This means that there is a possibility of hundreds of residents being severely impacted who are not even identified in this EIS. I find this completely unacceptable.**

⇒ **I object to the publication of this EIS only 14 days after the final date for submission of comments on the concept design. At the time this EIS was approved for publication, there had been no public response to the public submissions on the design. It was not possible that the community's feedback was considered let alone assessed before the EIS model was finalised. The rushed process exposes the fundamental lack of integrity in the feedback process and treats the community with contempt.**

⇒ **Many students walk or ride to Orange Grove and Leichhardt Secondary College schools via Darley Road.There are also a number of childcare centres very close to the Darley Road site.**

I submit my strongest objections to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: Miela Malyon

Signature:

Please **include** my personal information when publishing this submission to your website
Declaration: I HAVE NOT made any reportable political donations in the last 2 years.

Address: 69 Victoria St

Suburb: Lewisham Postcode 2049

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name:
WestConnex M4-M5 Link

- The project fails to address its most fundamental objective of connecting to Port Botany, the genesis of the entire enterprise

- Noise impacts - Pyrmont Bridge Road site - The EIS indicates that residents will be subjected to severe noise impacts for up to 4 months, caused by the long-term construction work proposed for this site which includes 8 weeks to demolish buildings, followed by 6 weeks to establish construction facilities, with pavement and infrastructure works required (EIS, 10-112) The EIS contains limited mitigation proposed to manage such impacts.

- Volumes on the main links (the trunks) cannot be as high as what is claimed in the EIS. It is physically untenable.

- I object to this stage of WestConnex which doesn't benefit western Sydney in any way because it doesn't even include the links to Port Botany or Sydney Airport which were the main justification for the whole project

- Because the strategic model does not limit the volume on road links and at intersection to their ceiling capacity; it cannot (and was not designed to) be used precisely as it is. A mesoscopic model, which can provide more a far greater level of detail than the strategic model used would have ensured a more thorough analysis of the networks' ability to cope with the traffic predicted.

- The EIS focusses on the impact of construction traffic during commuter peak-hours. Given the EIS notes that construction-related vehicles will be limited during peak-hours, information should be provided on the impact of construction-related vehicles when both traffic volumes are higher – in particular during weekday lunch peak and Saturday lunch peak for sites like the Pyrmont Bridge Road Tunnel Site where operations are proposed 24/7. (Tables 8-46, 8-47, 8-48, 8-51, 8-52, 8-53).

- The EIS does not require an acoustic shed and states that 'Acoustic barriers and devices at the access tunnel entrances would be considered and implemented where reasonable and feasible to minimise potential noise impacts associated with out-of-hours works within the tunnels.'

- SMC have made it extremely difficult for the community to access hard copies of the EIS. The local Glebe library only has one copy and this is the situation at other local libraries. There are very limited hours of access to these locations outside

---

Campaign Mailing Lists: I would like to volunteer and/or be informed about the anti-WestConnex campaigns - My details must be removed before this submission is lodged, and must be used only for campaign purposes and must not be divulged to other parties

Name _____ **Email** _____ **Mobile** _____

Submission from:	Submission to:
Name: Melissa Noval Signature: *Please **include** my personal information when publishing this submission to your website* ***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.* Address: 33/13-13 ERSKINEVILLE RD Suburb: NEWTOWN Postcode 2042	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001 Attn: Director – Transport Assessments Application Number: SSI 7485 Application Application Name: WestConnex M4-M5 Link

I submit this objection to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the following reasons, **and ask that the Minister reject the application.**

- Rozelle Rail Yards and Rozelle Civil Site.It is clear that the most highly affected area of Stage 3 will be the Rozelle area and the massive and hugely complex Rozelle interchange. The suggestion that Westconnex is capable of building this is highly questionable. Nothing like this has been built anywhere else in the World. Considering the simple problems of dust management, noxious gasses and the handling of toxic materials like asbestos that have been so inappropriately dealt with on Stages 1 and 2 by Westconnex this intersection of Stage 3 is a disaster waiting to happen and should definitely not be allowed to proceed without a massive investigation. What has been shown in the EIS is totally inadequate for this project to be allowed to proceed.

- The proposed work hours for the Rozelle Rail Yards are tunnelling and spoil handling 24 hours a day seven days a week. Civil construction Mon - Fri 7.00am – 6.00pm, Sat 8.00am -1.00 pm. There will be no night work at The Crescent Civil Site and the daytime hours are stated to be the same as at the Rozelle Rail Yards. However as has been experienced by those at Haberfield and St Peters these hours and especially late and night work have been extended and implemented when the schedule has fallen behind and this has lead to physical and mental stress for many residents through interrupted sleep and loss of sleep especially with children. The roads and sites at night in the area will see a marked increase in noise from truck movements, truck reversing alarms and running machinery. It will also see a marked increase in light during the night hours with site illumination and vehicle head lights as has been experienced in other areas. These problems have not been properly addressed and are not adequately dealt with in the EIS.

- The tunnels under Rozelle/Lilyfield are going to be in three levels. The EIS does not explain what safety procedures are being built into the project to deal with situations like serious congestion, accidents or fire. With a serious hold up on the deepest of these tunnels it is clear that the air quality will very quickly become toxic unless substantial air conditioning is a major part of the design. There is no in depth detail about how these issues are going to be addressed. This is not acceptable.

- One of the main reasons for establishing Buruwan Park was as a relatively quiet nature corridor for wildlife not for successions of children's parties so the assessment of this area in the EIS is entirely blinkered and inaccurate. The Rozelle Rail Yards site that may appear to development driven planners as an unattractive and wasted eyesore is ironically a very important nature reserve. It is perhaps the only area in the Annandale/Glebe area were Fairy Wrens can be found because of the substantial bush cover. This is very important as where these birds are found nature tends to be in balance which is not the case in parks like Easton Park and Bicentennial Park.

Campaign Mailing Lists : I would like to volunteer and/or be informed about the anti-WestConnex campaigns - My details must be removed before this submission is lodged, and must be used only for campaign purposes and must not be divulged to other parties

Name _____ Email _____ Mobile _____

I object to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: Melissa Novel

Signature:

*Please **include** my personal information when publishing this submission to your website*
***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.*

Address: 33/3-13 Erskineville Rd

Suburb: Newtown Postcode 2042

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

- The removal of spoil at the Rozelle Rail Yards will lead to the largest amount of Spoil truck movements on the entire Stage 3 project: 517 Heavy truck movements a day, of which 46 are stated to take place at Peak hours. There will also be 10 Heavy truck movements a day from the Crescent Civil Site. The sheer number of trucks on the road will lead to massive increases in congestion. Maps in the EIS have the spoil trucks going to and from these sites from the Haberfield direction on the City West Link. This is also the direction that is being proposed for spoil truck movements from Darley Rd which is said to have 100 Heavy truck movements a day. It is stated that the cumulative effect of truck movements from all sites on the City West Link will be 700 (one way) Heavy truck movements a day and of that 208 will be in Peak hours. This plan totally lacks credibility.

- The Rozelle Rail Yards site is the location of 3 Unfiltered Pollution Stacks. There is a fourth stack on Victoria Rd close to Darling St. If the Western Harbour Tunnel is built there will also be a total of 7 Tunnel Portals. Tunnel Portals are also areas of high levels of pollution. It is totally unacceptable that the Pollution Stacks are unfiltered. In 2008 Gladys Berejiklian said of Labor "It's not too late, the Government can still ensure that filtration is a possibility. World's best practice is to filter tunnels. Why won't Labor allow people to sleep at night, knowing their children aren't inhaling toxins that could jeopardize their health now or in the future." It is totally unacceptable that the tunnels will not be filtered. Recently built tunnels in Tokyo successfully filter 98% of all pollutants.

- Generally the risk of settlement is lessened where tunnelling is more that 35m. In the Rozelle area the tunnel will be at 30m in the Brockley St & Cheltenham St area, and it will be less than that in the Denison St area. Also it is planned to have another layer of tunnels above that in the Denison St area. From the cross section diagram Vol 2B appendix E part 2 the suggestion is that this higher level of tunnels will be at no more than 12m. This is of major concern. Numbers of people in the ongoing construction of Stage 1 and 2 have suffered extensive damage to their homes costing thousands of dollars to rectify caused by vibration and tunneling activities and although they followed all the elected procedures their claims have not been settled. This is totally unacceptable. There is nothing addressing these major concerns in the EIS.

- The EIS states that property damage due to ground movement "may occur, further stating that "settlement induced by tunnel excavation and groundwater drawdown may occur in some areas along the tunnel alignment". The risk of ground movement is lessened where tunnelling is more than 35 metres underground. (Vol 2B Appendix E p 1) The planned Inner West Interchange proposes tunnels which are astonishingly shallow eg John St at 22metres Hill St at 28metres Moore St 27metres. Piper St 37metres(Vol 2B Appendix E Part 2) Catherine St at 28metres(Vol 2B Appendix E Part 1). At these shallow depths, the homes above would indisputably sustain serious structural damage and cracking. Without provision for full compensation for damage there would be no incentive for contractors or Roads and Maritime Services to minimise this damage.

Campaign Mailing Lists : I would like to volunteer and/or be informed about the anti-WestConnex campaigns - My details must be removed before this submission is lodged, and must be used only for campaign purposes and must not be divulged to other parties

Name _____ Email _____ Mobile _____

Submission from:	Submission to:
Name: Juliette BORRI Signature: Borri *Please **include** my personal information when publishing this submission to your website* ***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.* Address: 54 Station street Suburb: Newtown Postcode 2042.	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001 Attn: Director – Transport Assessments Application Number: SSI 7485 Application Application Name: WestConnex M4-M5 Link

I submit this objection to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the following reasons, and ask that the Minister reject the application.

- The EIS uses the term 'construction fatigue' to refer to the continuing impacts of construction. In St Peters construction work in relation to the M4 and M5 has been going on for years. Approval of this latest EIS will mean that construction impacts of M4 and New M5 will extend for a further five years with both construction and 24/7 tunnelling sites. In reality 'construction fatigue' means residents in St Peters losing homes and neighbours and community; roadworks physically dividing communities; sickening odours over several months, incredible noise pollution 24 hours a day and dangerous work practices putting community members at risk. These conditions have already placed enormous stress on local residents, seriously impacting health and well-being. Another 5 years will be breaking point for many residents. How is this addressed in the EIS beyond the acknowledgement of 'construction fatigue'. This is intolerable for the local community who bear the greatest cost of the construction of the M4 and M5 and the least benefit.
- In Leichhardt serious safety concerns about the choice of the Darley Rd site have been raised by the Inner West Council and an independent engineer's report. Despite countless meetings between local residents and SMC and RMS over 12 months, none of the serious and legitimate concerns raised by the residents have even been acknowledged. This is a massive breach of community trust and seriously questions the integrity of the EIS.
- The RMS has previously identified the Darley Rd site in Leichhardt as the third most dangerous traffic hazard in the Inner West. The NSW Land and Environment Court found that the location of the site couldn't safely deal with 60 bottle truck movements a week, but the M4/M5 EIS shows that more than 800 vehicles including hundreds of heavy ones will use the site each day as part of construction of M4M5 Link. HOW IS THIS POSSIBLE? why are the already acknowledged impacts being ignored.
- It has estimated that if construction goes ahead, some homes in Darley St Leichhardt will have a truck on average every 4 minutes just metres from their bedrooms. If experience in Haberfield, Kingsgrove, St Peters and Alexandria is anything to go by, residents can again expect the actual experience to be worse than predicted by the EIS. HOW IS THIS POSSIBLE? why have the serious and legitimate concerns raised by the residents not even been acknowledged.
- The EIS identifies hundreds of risks at different construction sites. It relation to these risks the EIS recommends proceeding despite the risks; or seeking a way to mitigate risks during the "detailed design" phase. That phase excludes the public altogether. That is, the M4/M5 should be approved with no calculation of risks or what mitigation may mean for impacted residents.
- EIS social impact study states that "the health and safety of residents should be prioritised around construction areas" - this is merely platitudinous in the light of the choice of Darley Rd the third most dangerous traffic intersection in the Inner West as a construction site.

Campaign Mailing Lists : I would like to volunteer and/or be informed about the anti-WestConnex campaigns - My details must be removed before this submission is lodged, and must be used only for campaign purposes and must not be divulged to other parties

Name _____ Email _____ Mobile _____

Attention Director *Application Number: SSI 7485* *Infrastructure Projects, Planning Services,* *Department of Planning and Environment* *GPO Box 39, Sydney, NSW, 2001* *Application Name: WestConnex M4-M5 Link*	*Name:* Ashlee Savins *Signature:* *Please include my personal information when publishing this submission to your website.* *I HAVE NOT made reportable political donations in the last 2 years.* *Address:* 66/115 Constitution Rd *Suburb:* Dulwich Hill *Postcode* 2060

I object to the WestConnex M4-M5 Link proposals for the following reasons:

- I do not accept that King Street traffic congestion will be improved by this project, There should be a complete review of the traffic modelling that does not appear to take sufficient notice of the impact of pouring 51000 extra cars down Euston Rd on top of increases in population in the area. Given that there is no outlet between the St Peters and Haberfield or Rozelle, all traffic going to the CBD, East or into the Inner West will use local roads.

- EIS 6.1 (Synthesis, Page 45) states. *"..... this may result in changes to both the project design and the construction methodologies described and assessed in this EIS. Any changes to the project would be reviewed for consistency with the assessment contained in the EIS including relevant mitigation measures, environmental performance outcomes and any future conditions of approval".* It is unstated just who would have responsibility for such a "review(ed) for consistency", and how these changes would be communicated to the community. The EIS should not be approved till significant 'uncertainties' have been fully researched and surveyed and the results (and any changes) published for public comment (ie : the Sydney Water Tunnels issues at 12-57)

- I object to the issue of this EIS only 14 days after the period for submission of comments on the concept design closed. There is no public response to the 1,000s of comments made on the design and it seems impossible that the comments could have been reviewed, assessed and responses to them incorporated into the EIS in that time. This casts doubt over the integrity of the entire EIS process.

- Why is there no detailed information about the so called 'King Street Gateway' included in the EIS ?

- An on-line interactive map was published with the M4-M5 Concept Design that indicated a very wide yellow 'swoosh' that is upwards of a kilometre wide in some sections of the M4-M5 proposals. SMC have NEVER publicly published or acknowledged that the contractor to be appointed to build the tunnels will be 'encouraged' to do so within the yellow swoosh footprint, but may go outside the indicative swoosh area if found necessary after further geotech and survey work. The proposed Sydney Water Tunnels surveys (EIS 12-57) could potentially see a dramatic change in the tunnel alignments in the Newtown area. Why were these surveys not done during the past three years such that 'definitive' rather than 'indicative' alignments could be published. The EIS should be withdrawn till such time that it is a true and fair 'definitive' document open for genuine public comment.

Campaign Mailing Lists *: I would like to volunteer and/or be informed about the anti-WestConnex campaigns - My details must be removed before this submission is lodged, and must be used only for campaign purposes and must not be divulged to other parties*

Name _____ *Email* _____ *Mobile* _____

Attention Director *Infrastructure Projects, Planning Services,* *Department of Planning and Environment* *GPO Box 39, Sydney, NSW, 2001*	Name: Paul Reberger Address: 86 Nepean St
Application Number: SSI 7485	Suburb: Postcode Emu Plains 2750
Application Name: WestConnex M4-M5 Link	Signature: P Rem
Please **include** my personal information when publishing this submission to your website **Declaration**: I **HAVE NOT** made any reportable political donations in the last 2 years.	

I object to the whole of the WestConnex Project, and the specific WestConnex M4-M5 Link proposals as contained in the EIS application, for the following reasons:

- I object to the high tolls imposed on drivers who have no decent alternative in public transport if they live further west than Parramatta. I am outraged that the EIS quotes from studies in favour of tollways paid for by Transurban, which owns more tollways in Australia than any other corporation. This is so obviously biased.

- I object to this new tollway because of the long-lasting high tolls. In the past tolls were justified as needed to pay for the new road. This is not the case of this tollway that will charge tolls for decades after the original roads are paid for. This is only to guarantee revenue to the prospective owner.

- The EIS hardly mentions any part of Sydney west of Parramatta but we are told this project is for the long term benefit of Western Sydney. This is not borne out by the EIS. All the justification focuses on the links of this stage to the western harbour tunnel and northern beaches tunnel. Or it talks about the "Sydney Gateway" to the airport and Port Botany and they are not even part of this project.

- The roads around Sydney Airport are already traffic jams, yet this project will send 1,000s more cars per day into Bourke Rd and Gardeners Rd. I object to the push for the M4-M5 link when there are still no plans for the Sydney Gateway that can deal with the increased traffic

- Because of the high tolls drivers who have to travel east daily will look for alternative routes and build up the traffic on local roads, both here in western Sydney, on Parramatta Rd and all the way to the city. There is no way the WestConnex roads will reduce traffic on un-tolled roads when the tolls on the WestConnex sections are so high and set to increase every year.

- The WestConnex Traffic Model has not been released to Councils and the community so no one can assess its accuracy particularly all the assertions that the tollways will relieve traffic on other roads, particularly Parramatta Rd.

- Rather than adding to pollution, the NSW government should be seeking ways to reduce car emissions which are now identified with premature deaths. It is not acceptable for the EIS to argue that worsening pollution is not a problem simply because it is already bad. Car emissions are bad for people's health and for the environment.

This project should NOT be approved on the basis of the EIS.

Campaign Mailing Lists :I would like to volunteer and/or be informed about the anti-WestConnex campaigns - My details must be removed before this submission is lodged, and must be used only for campaign purposes and must not be divulged to other parties

Name_____ Email_____ Mobile _____

I object to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: MADELEINE PILL

Signature: Madeleine Pill

*Please **include** my personal information when publishing this submission to your website*
***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.*

Address: 30 CHARLES ST.

Suburb: ENMORE Postcode 2042

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

- It is clear from the EIS that spoil truck movements will not be confined to the City West link. At a community consultation it was revealed that trucks removing spoil at Camperdown would very likely be travelling from the James Craig Rd area and in that case would be using the additional lane on the Crescent and then turning right up Johnston St. This is totally CONTRARY to what concerned residents had been promised would not happen. It is clear that any assurances given to the community in past consultations are totally disregarded without consultation later. This is unacceptable.

- The latest EIS was released just ten business days after feedback period ended for the Concept Design for the M4/M5 and before preliminary drilling to establish a route through the Inner West is completed. WHAT IS THE RUSH? This EIS is little more than a concept design and is far less developed than earlier ones. It is composed of many indicate only plans such that it is impossible to know what the impacts will be and yet approval is being sought in a rush. The EIS ignores more than 1500 submissions, including one of 142 pages from the Inner West Council.

- The proposal to run trucks so close to homes is dangerous. There have been two fatalities on Darley Road at the proposed site location. The EIS does not propose any noise or safety barriers to address this. Despite the unacceptable impact to nearby homes, there is no proposal for noise walls, nor any mitigation to individual homes.

- Because this is still based on a "concept design" it is unknown how the communities affected will not know what is being done below their residences, schools, business premises and public spaces, particularly if the whole project is sold into a private corporation's ownership before the actual designs and construction plans are determined. The EIS makes references to these designs and plans being reviewed but there is NO information as to what agency will be responsible for such reviews or whether the outcomes of such reviews will be made public. The communities below whose homes, business premises, public buildings and public spaces this massive project will be excavated and built will be completely in the dark about what is being done, what standards it is supposed to comply with, what inspection or scrutiny it will subject to, and whether the private corporations undertaking the work will be held to any liability by our government.

- I am appalled that the Sydney Motorway Corporation could seek approval to build complex interchanges under the suburbs of Rozelle and Leichhardt on the basis of an EIS that is based on a concept design rather than detailed proposal that includes engineering plans.

- The EIS states that by 2033 Ross St will see an increase of 80 heavy vehicles a day at Peak periods. The greatest increase of Heavy vehicles at the PM peak will be in Johnston Street, which will see an increase of about 30-50 vehicles when compared to the 'without project' scenario. At Catherine St there will be an increase of 30 heavy vehicles a day at Peak periods. These streets will see a huge increase in Heavy vehicle movements if Stage 3 is built. The increase would be roughly half this amount if the project did not go ahead. Annexure Fig 26 B2 Section H

Campaign Mailing Lists : I would like to volunteer and/or be informed about the anti-WestConnex campaigns - My details must be removed before this submission is lodged, and must be used only for campaign purposes and must not be divulged to other parties

Name _____ Email _____ Mobile _____

Submission from:	Submission to:
Name: Brad Colledge Signature: *Please **include** my personal information when publishing this submission to your website* ***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.* Address: 1/461 King St Suburb: Newtown Postcode 2042	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001 Attn: Director – Transport Assessments Application Number: SSI 7485 Application Application Name: WestConnex M4-M5 Link

I submit my objection to the WestConnex M4-M5 Link as contained in the EIS application # SSI 7485, for the following reasons, **and ask that the Minister reject the application and require preparation of a genuine, not indicative, EIS**

◊ *Heavy vehicle movements during peak hours – Leichhardt. The EIS states that 'reasonable and practical management strategies would be investigated to minimize the volume of heavy vehicle movements during peak hours.' (8-53). This is also not acceptable as it is not known what will actually be done to manage this impact. It is not good enough for the EIS, which forms the basis of the approval of this project, to simply mention 'investigations' and not detail a proper plan (on which residents can comment) on management of heavy vehicle movements during peak hours. In addition, Darley Road is very congested from 7am until 9.30am and then from 4pm-6.30pm, well outside the 'peak' periods identified in the EIS. And the impact on traffic will be caused by 'light' vehicles and not simply heavy vehicles. It is clear that there is no plan for managing these vehicle movements. The EIS should not be approved as drafted. It is unacceptable for this volume of vehicles to be proposed for this critical arterial road with no plan for management*

◊ *The volume of extra heavy traffic in the Rozelle area and the acknowledged impact this will have on local roads is completely unacceptable to me.*

◊ *It is stated that if congestion proves to be a problem then other solutions will have to be found. Other routes that are being considered will be using the Western Distributor, the Crescent, Victoria Rd, Ross St, Pyrmont Bridge Rd and Johnston St. The Crescent and Johnston St are clearly going to be used. This despite the fact that in a consultation those representing Westconnex assured residents of Annandale that neither Johnston St or Booth St would be used. It is expected that these routes will also be used for night transport. It is clear that it is unlikely that transportation routes shown in the EIS will be adhered to. This is unacceptable.*

◊ *Daytime noise at 177 properties across the project is predicted to be so bad during the years of construction that extra noise treatments will be required. The is however a caveat - the properties will change if the design changes. My understanding is that the design could change without the public being specifically notified or given the chance for feedback. This means that there is a possibility of hundreds of residents being severely impacted who are not even identified in this EIS. I find this completely unacceptable.*

◊ *Discharge of water into storm water at Blackmore Oval – Leichhardt The permanent substation and water treatment plant proposed for the Darley Road site facility should not be approved as part of the EIS. It proposes discharging water from the tunnels into the storm water canal near Blackmore Oval. This will devastate our waterways and impact negatively on the amenity of the bay which has four rowing clubs in close proximity. In addition, the environmental impacts of this discharge are not properly set out in the EIS.*

Attention Director
Application Number: SSI 7485

Infrastructure Projects, Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001
Application Name:
WestConnex M4-M5 Link

Name: Amanda Holt

Signature: Amanda Holt

Please include my personal information when publishing this submission to your website. I HAVE NOT made reportable political donations in the last 2 years.

Address: 57 Grove St

Suburb: Lilyfield Postcode 2040

I submit my objection to the WestConnex M4-M5 Link proposals for the reasons stated below, and request the Minister reject the application entirely, and cause the proponents to reissue an EIS that is based on a fully researched, developed, and budgeted concept design, and require the proponents to prepare a new business case against that design.

- The nature of proposed "post-opening mitigation measures" (Page 223, Chapter 9.8, Appendix H) are unknown and their impacts could be significant including intersection and road widening (and associated property loss), banning parking in local centres, removal of trees, footpaths and cycling facilities. The people of NSW have a reasonable expectation to understand whether such impacts form part of the Project and they should be detailed in the EIS. They should not be left to a "wait and see" approach. Not only a proper analysis of demand, but also of traffic dispersion should be provided for connecting roads up to three kilometres from every exit and entry portal and the capacity of those roads analysed.

- I object to the whole project but particularly the tolls which are unfair when people living west of Parramatta really need alternative to western neighborhoods north-south. If we had better public transport then many of us would not have to drive and this would reduce the traffic.

- The strategic model (whole system) inputs traffic volumes that simply cannot be accommodated in the road interchanges and feeder routes. It is physically impossible to fit that amount of traffic on a road.

- The induced demand of 0.3% is too low based on historical experience in Sydney. The benefits counted from reduced traffic volumes on roads such as the existing M5 and the Eastern Distributor are unlikely to be realized due to real levels of induced demand

- The modelling process incorporates a highly unusual definition of induced traffic (p.45 of Appendix H). Induced traffic should not include the increase in trips due population growth and land use changes as these are modelled elsewhere.

- The EIS notes that "in preparing the traffic staging plans during construction the key considerations (...) include maintaining traffic and lane capacity (...) on the arterial road network, particularly during peak periods; minimising impacts on public transport services (...); and minimising impacts on key active transport links". Existing capacity for both public and active modes of transport should be maintained. (P 8-70)

- The method and logic used to develop and assess the Project is similar to methods that have delivered numerous motorways around Australia that have not only failed to ease congestion, but have made it significantly worse.

Campaign Mailing Lists *: I would like to volunteer and/or be informed about the anti-WestConnex campaigns - My details must be removed before this submission is lodged, and must be used only for campaign purposes and must not be divulged to other parties*

Name _____ Email _____ Mobile _____

23/9/17

Submission to: Planning Services Department of Planning and Environment GPO Box 39, Sydney, NSW 2001 Attention: Director – Transport Assessments Application Number: SSI 7485 Application Name: WestConnex M4-M5 Link	Name: Amanda Holt Signature: Amanda Holt *Please **include / delete (cross out or circle)** my personal information when publishing this submission to your website.* ***Declaration:** I **HAVE NOT** made any reportable political donations in the late 2 years.* Address: 57 Grove St Suburb: Lilyfield Postcode: 2040

I object to the Westconnex M4-M5 link proposals as contained in the EIS for the following reasons:

1. The EIS is a strategy document only. It does not commit to any design, and therefore it doesn't address any local issues which are created by the construction of the M4-M5 link. Its whole purpose is to prepare a legal and bureaucratic pathway for the sale of Sydney Motor Corporation to the private sector thereby removing the Government from the oversight and responsibility for the design and construction. It also endeavours to lock out the public from being able to have any say in what is built, how it is built and where it is built.

2.The EIS shows that traffic on the City West Link, Johnston St, the Crescent, Catherine St and Ross street will greatly increase during the construction period and also be greatly increased by the time Stage 3 is completed. It states that Stage 3 will do nothing to improve traffic congestion in the area in fact it will add to the problem. Many of these areas are already congested at Peak times. This will be highly negative for the local area as more and more people try to avoid the congestion by using rat runs through the local areas on local streets.

3. The proposed work hours for the Rozelle Rail Yards Site are tunnelling and spoil handling 24 hours a day seven days a week. On ground construction Mon-Fri 7.00am – 6.00pm, Sat 8.00am- 1.00pm. However as has been experienced by those at Haberfield and St Peters these hours and especially late and night work have been extended and implemented when the schedules have fallen behind and this has lead to great physical and mental stress for many residents through interrupted sleep and loss of sleep especially for those with children. The roads and sites at night in the area will see a marked increase in noise from truck movements, truck reversing alarms and running machinery. It will also see a marked increase in light during the night hours with site illumination and vehicle head lights as has been experienced in other areas. These problems have not been addressed in the EIS.

4. The Rozelle Rail Yards site is the location of 3 Unfiltered Pollution Stacks. There is a fourth stack on Victoria Rd close to Darling St almost opposite Rozelle Primary School. If the Western Harbour Tunnel is built there will also be a total of 7 Tunnel Portals. Tunnel Portals are also areas of high levels of pollution. It is totally unacceptable that the Pollution Stacks are unfiltered. Recently built tunnels in Tokyo successfully filter 98% of all pollutants. There are at least 5 schools and childcare centres in close proximity to these pollution stacks.

5. Heart disease will skyrocket due to air pollution caused by Westconnex bringing more cars into the Inner West says Paul Torzillo, Head of Respiratory medicine at Royal Prince Albert Hospital. Inner West Courier 23rd May 2017

6. Motor vehicles account for 14% of Particulate Pollution of 2.5 microns and less in Australia. There is no safe level to exposure to particulate matter of 2.5 microns and less. Fine particulate matter is linked with Asthma, Lung Disease, Cancer, Stroke and poor lung development in children. Those most at risk are the old, the young and the unborn of pregnant women.

7. The Rozelle Rail Yard stacks are stated to be 38m high and are situated in a valley area. The majority of Balmain Road is 39m above sea level and Annandale St is at 29m above sea level. Both are considerably less than 1 kilometre from the Rail Yard stacks so pollution will be blown directly into many homes in these areas. This will expose the residents of Annandale, Lilyfield, Rozelle and Balmain to highly increased health risks.

8. There will be major impacts on the Anzac Bridge with a projected increase of 60% in daily traffic. There will also be major impacts to the Sydney City Centre. The EIS states that this will lead to major impacts on bus travel time and reliability. The EIS's suggests that people will have to adjust their travel times to starting for work earlier and finishing later. This is unacceptable and underlines Westconnex's waste and total failure.

Attention Director *Infrastructure Projects, Planning Services,* *Department of Planning and Environment* *GPO Box 39, Sydney, NSW, 2001*	Name: Matthew Roberger Address: 86 Nepean St Emu Plains
Application Number: SSI 7485	Suburb: Postcode 2750
Application Name: WestConnex M4-M5 Link	Signature: M Roberger
Please **include** my personal information when publishing this submission to your website **Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.	

I object to the whole of the WestConnex Project, and the specific WestConnex M4-M5 Link proposals as contained in the EIS application, for the following reasons:

- The state government has already announced it will sell the project. There has been no public discussion or consultation about this decision. I object to the privatization of the road system. The public interest in an efficient and equitable transport system cannot be protected because the private owners will have to operate it to make a profit for shareholders.

- I object to this new tollway because in the past tolls have been justified as needed to pay for the new road. This new tollway will charge tolls for 40 years, decades after the road has been paid for. This is only to make the project attractive to a private buyer.

- The high tolls are set to increase by the CPI or by 4% a year, whichever is higher. When inflation is low and wages are not even keeping up with low inflation this is outrageous. This is exploitation of western Sydney road users without giving them adequate alternative means of transport. .

- It is well known that residents in Western Sydney have no adequate alternative in public transport if they live further out from Parramatta. I am appalled the EIS, which is supposed to be an independent assessment, quotes from studies in favour of tollways paid for by Transurban, which owns more tollways in Australia than any other corporation. The whole thing is cooked up to favour private road operators like Transurban.

- The EIS has to admit that on average people who live in western Sydney have lower household incomes than in the inner suburbs and that the tolls will therefore be a heavier cost in Emu Plains, Penrith, Mt Druitt, Blacktown or Wetherill Park than in Strathfield or Padstow. This is unfair when the benefits of Stage 3 are all for north-south connections to the northern beaches or the proposed new harbour tunnel.

- People travelling to work in Sydney city want better and more frequent trains. Most people in Emu Plains, Penrith, Mt Druitt, or Blacktown who work in Sydney CBD use the trains to get to work but better trains are just dismissed by the EIS.

- A fraction of money for Stages 2and 3 of WestConnex should have been spent on upgrading the railway signal system so the train service could be improved. That would actually take cars off the road and improve the traffic flow. I object that we were never given a choice about it.

- The state government is forcing us to use private car transport more when most major cities in the world are trying to reduce the number of cars on the roads. This means more pollution and worse health for all the people living within half a kilometre on major roads. The real costs of this project in pollution and health are not mentioned in the EIS.

I urge the Secretary of Planning to refuse approval of this project.

Campaign Mailing Lists :I would like to volunteer and/or be informed about the anti-WestConnex campaigns - My details must be removed before this submission is lodged, and must be used only for campaign purposes and must not be divulged to other parties

Name_____ Email_____Mobile _____

Attention Director *Application Number: SSI 7485* *Infrastructure Projects, Planning Services,* *Department of Planning and Environment* *GPO Box 39, Sydney, NSW, 2001* *Application Name:* *WestConnex M4-M5 Link*	*Name:* V. Vella *Signature:* V. Vella ..... *Please include my personal information when publishing this submission to your website. I HAVE NOT made reportable political donations in the last 2 years.* *Address:* 10 Amy St *Suburb:* Marrickville *Postcode* 2204

I submit my objection to the WestConnex M4-M5 Link proposals for the reasons stated below, and request the Minister reject the application entirely, and cause the proponents to reissue an EIS that is based on a fully researched, developed, and budgeted concept design, and require the proponents to prepare a new business case against that design.

⇒ The St Peters and Rozelle interchanges at are of particular concern. St Peters will have large volumes of vehicles accelerating and decelerating as they enter and exit tunnels and access roads, next to proposed playing fields. This is complicated by emissions stacks located in the Interchange – whereby pollution from the interchange is supercharged by the emissions from the stacks

⇒ the Secretary's Environmental Assessment Requirements (SEARs) for the EIS (Page 8-2 – Table 8-1) require the Applicant to consider the operational transport impact of toll avoidance however information provided on toll avoidance in Chapter 9.8 (Page 222) of Appendix H is limited to four short paragraphs.

⇒ Road congestion is reducing bus performance and reliability. The project will make it worse.

a) The EIS says traffic on ANZAC Bridge will increase by 2023 (p.8-103).
b) Traffic modelling shows bus times will be slower into the city in the morning (p.3-19).
c) The EIS identifies capacity constraints on ANZAC Bridge (p3-19). This project will dump more traffic onto the ANZAC Bridge.

⇒ The EIS notes that the project design and land use forecasts have changed significantly since the Stage 2 and Stage 3 EIS. However the cumulative analysis does not quantify the expected change on those roads. The EIS only notes significant increases in traffic volumes.

⇒ The construction and operation of the project will result in 51 property acquisitions. We object to the project in its entirety because of this impact. We note that a number of long-standing businesses have been acquired and that many families and businesses in earlier stages have been forced to go to court to seek fair compensation. We object to the acquisition in particular of the Dan Murphys site. The business was substantially renovated and a new business opened with full knowledge of the likely acquisition. We object to it being acquired and compensated in this circumstances and call on the Government to investigate the circumstances which led to this occurring (Executive Summary xvii)

⇒ I do not consider it acceptable that cycling/pedestrian routes should be changed for four years in Annandale and Rozelle in ways that will make cycling more difficult and walking less possible for residents with reduced mobility. These are vital community transport routes.

Campaign Mailing Lists *: I would like to volunteer and/or be informed about the anti-WestConnex campaigns - My details must be removed before this submission is lodged, and must be used only for campaign purposes and must not be divulged to other parties*

Name _____ *Email* _____ *Mobile* _____

Attention Director
Application Number: SSI 7485

Infrastructure Projects, Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Application Name: WestConnex M4-M5 Link

Name: Milk & Thistle

Signature:

Please include my personal information when publishing this submission to your website.
I HAVE NOT made reportable political donations in the last 2 years.

Address: 592 King Street

Suburb: Newtown Postcode 2042

I object to the WestConnex M4-M5 Link proposals for the following reasons:

1. The heritage impacts of WestCONnex Stage 3 need to be seen in the light of the appalling wholesale destruction that has already taken place in St Peters and Haberfield. Scores of houses and industrial buildings were torn down for tollways that will not solve traffic congestions. Always the cost of destruction is undervalued and the benefits of WestCONnex promoted. Whenever WestCONnex wants to tear down buildings or put them at risk it is backed by the EIS evaluation. This is not objective and it is not in the public interest.

2. I object strongly to AECOM's approach to heritage. The methodology used is simply to describe heritage. If it interrupts the project plans, it simply must be destroyed. This is not an assessment at all. Plans to salvage items do have value but this value should not be used as a carrot to justify the removal of buildings.

3. The EIS claims to have saved Blackmore Park and Easton Park, Rozelle, due to negative community feedback. I am concerned that this is a false claim and that this site was never really in contention due to other physical factors. I would like NSW Planning to investigate whether this claim is correct to have heeded the community is false or not.

4. There has never been any proper assessment of the cumulative impacts on heritage of the WestCONnex project. The loss of heritage in Concord, Haberfield and St Peters has been on a large scale and now the Stage 3 EIS shows that the M$/M5 tunnel would further add to this loss.

5. Heritage items - Camperdown. The EIS also acknowledges that the use of a rock-breaker at the outer extents of the project footprint will affect 73 residences, with five heritage items identified as having the potential to be within the 'minimum safe working distance'. While some mitigation 'considered', it is not mandated and the requirement to mitigate is limited to 'where feasible and reasonable'. The mitigation proposed seems in any event to comprise letter-boxing residents about the likely impacts! The protection of heritage items should be mandated, not just considered and there should be a strict requirement to protect such heritage items.

6. I object to the assessment of the removal of buildings, other rail infrastructure and vegetation on the Rozelle Railway Yards being done in advance of this EIS. The RMS environmental assessment process is not publicly accountable. These works were part of the WestConnex project and should have been assessed as part of Stage 3.

Campaign Mailing Lists : I would like to volunteer and/or be informed about the anti-WestConnex campaigns - My details must be removed before this submission is lodged, and must be used only for campaign purposes and must not be divulged to other parties

Name _____ Email _____ Mobile _____

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: CHRIS GORDON
	Address: 70 WELLS ST
Application Number: SSI 7485	Suburb: NEWTOWN Postcode 2042
Application Name: WestConnex M4-M5 Link	Signature:
Please **include** my personal information when publishing this submission to your website **Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.	

I object to the whole of the WestConnex Project, and the specific WestConnex M4-M5 Link proposals as contained in the EIS application, for the following reasons:

I. The EIS should not be approved as it does not contain any certainty for residents as to what is proposed. The EIS states 'the detail of the design and construction approach is indicative only based on a concept design and is subject to detailed design and construction planning to be undertaken by the successful contractors.' Therefore this entire process is a sham as the extent to which concerns are taken into account is not known as the contractor can simply make further changes. As the contractor is not bound to take into account community impacts outside of the strict requirements and as the contractor will be trying to deliver the project as quickly and cheaply as possible, it is likely that the additional measure proposed with respect to construction noise mitigation for (example) will not be adopted. The EIS should not be approved on the basis that it does not provide a reliable basis on which to base the approval documents. It does not provide the community with a genuine opportunity to provide meaningful feedback in accordance with the legislative obligation of the Government to provide a consultation process because the designs are 'indicative' only and subject to change. Because of this the EIS is riddled with caveats and lacks clear obligations and requirements fn project delivery. The additional effect of this is that the community and other stakeholders such as the Council will be unable to undertake compliance activities as the conditions are simply too broad and lack any substantial detail.

II. The EIS acknowledges that impacts of construction should M4M5 get approval will worsen traffic congestions on Parramatta Rd. In these circumstances it would be outrageous for motorists to be asked to pay up to up to $20 a day in tolls. I object to the fact that this is not considered or factored into the traffic analysis.

III. Experience on the New M5 has shown that residents who are affected badly by noise are being refused assistance on the basis that an unknown consultant does not consider them to be sufficiently affected. Night time noise is therefore another unacceptable impact of this project and reason why it should be opposed.

IV. The EIS states that 'reasonable and feasible work practices and mitigation measures would be implemented to minimise potential noise impacts due to activities occurring at the Darley Road civil and tunnel site.' 96-52) This is not good enough. The EIS does not contain any detail whatsoever of these proposal on which they can comment. In addition, there is no requirement that measures will in fact be introduced to address noise impacts. The approval conditions need to contain detail of specific noise mitigation measures that are mandated and can be enforced.

Campaign Mailing Lists : I would like to volunteer and/or be informed about the anti-WestConnex campaigns - My details must be removed before this submission is lodged, and must be used only for campaign purposes and must not be divulged to other parties

Name _____ Email _____ Mobile _____

Attention Director *Infrastructure Projects, Planning Services,* *Department of Planning and Environment* *GPO Box 39, Sydney, NSW, 2001*	Name: Elizabeth Manoukian
	Address:
Application Number: SSI 7485	Suburb: Postcode 2745. Glenmore Park
Application Name: WestConnex M4-M5 Link	Signature:
Please **include** my personal information when publishing this submission to your website **Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.	

I object to the whole of the WestConnex Project, and the specific WestConnex M4-M5 Link proposals as contained in the EIS application, for the following reasons:

- I object to the WestConnex project because of the increased car emissions it will cause. Elsewhere in Europe and UK governments are growing very concerned about the bad effects of car emissions on people's health and are taking steps to toughen emission standards. Why is the state government promoting car use and ignoring the very real public health concerns?

- What workers travelling to Sydney city need is a better and more frequent train service. Most people in Emu Plains, Penrith, Mt Druitt, or Blacktown who work in Sydney CBD travel by train. The EIS does not properly evaluate the public transport alternatives to the WestConnex road project.

- The state government has already announced the sale of the WestConnex project. I object to the privatization of the road system. There is no way to guarantee the public interest in an efficient transport system is protected when the private operator must ensure a return to shareholders.

- I really object to the way this project is hailed by the Minister for Western Sydney, Stuart Ayres, for the benefit of western Sydney. There is almost no mention of the parts of Sydney west of Parramatta in the EIS. All the justifications for this stage of WestConnex are about linking the new M4 and M5 to the proposed western harbour tunnel and northern beaches tunnel. These are barely concept designs at this stage. The long promised direct route to the airport and Port Botany are not even included in this project. Now we discover that the Sydney Gateway to the port) is a separate project, will have an additional toll and is not planned or funded at this point.

- The EIS has to admit that the high tolls will force drivers who have to travel east daily to look for alternative routes. This will increase the traffic on local roads, both here in western Sydney, on Parramatta Rd and all the way to the city. There is no way the WestConnex roads will reduce traffic on un-tolled roads with tolls on the WestConnex sections so high.

- The EIS in fact admits the impact of years of construction of the M4-M5 Link will worsen traffic on Parramatta Rd. It is outrageous that already drivers are forced to pay up to $20 a day in tolls to use the M4. This is already making the traffic on Parramatta Rd worse because drivers are choosing not pay the tolls.

- This new tollway project will not reduce traffic, just move it around. If they were serious about reducing traffic in Parramatta Rd they would put a toll on it and make the new roads free to encourage the traffic to use the new roads. They are doing the exact opposite, so it is only about gouging the public for the private owner – the Sydney Motorway Corporation.

I ask the Secretary of Planning not to approve this project.

Campaign Mailing Lists :I would like to volunteer and/or be informed about the anti-WestConnex campaigns - My details must be removed before this submission is lodged, and must be used only for campaign purposes and must not be divulged to other parties

Name_____ Email_____ Mobile _____

I object to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: Tanya Volkofsky

Signature:

Please include my personal information when publishing this submission to your website

***Declaration** : I HAVE NOT made any reportable political donations in the last 2 years.*

Address:

Suburb: Newtown Postcode 2042

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

- *The Darley Road site should be rejected because it involves acquiring Dan Murphy's. This business was rem=novated and opened with full knowledge that it was to be acquired. The lessee and sub-lessees should not be permitted compensation in these circumstances. The demolition of the entire building (which the EIS confirms will occur) is wasteful and represents mismanagement of public resources.*

- *Because of the high tolls drivers who have to travel east daily will look for alternative routes and build up the traffic on local roads, both here in western Sydney, on Parramatta Rd and all the way to the city. There is no way the WestConnex roads will reduce traffic on un-tolled roads with tolls on the WestConnex sections so high.*

- *This EIS contains little or no meaningful design and construction detail. It appears to be a wish list not based on actual effects. Everything is indicative, 'would' not 'will', telling me nothing is actually 'known' for certain – and is certainly not included here.*

- *Increased traffic congestion in areas around portals will increase pollution along roadsides, with predicted adverse impacts on breathing and through long-term carcinogenic effects. The maps and analysis of the pollution effects in the EIS should be presented in a way that enables them to be understood by ordinary citizens. Instead information is presented in a way that is deliberately obscure and hard to interpret.*

- *I do not consider so many disruptions of pedestrian and cycle ways to be a 'temporary' impact. Four years in the life of a community is a long time. The EIS acknowledges that there will be more danger in the environment around construction sites. It is a serious matter to deliberately take steps to reduce the safety of a community, especially when as the traffic analysis shows there will be a legacy of traffic congestion even in 2033. A promise of a plan is NOT an answer to those concerned about the impacts.*

- *The EIS uses the term 'construction fatigue' to refer to the continuing impacts of construction. In St Peters construction work in relation to the M4 and M5 has been going on for years. Approval of this latest EIS will mean that construction impacts of M4 and New M5 will extend for a further five years with both construction and 24/7 tunnelling sites. In reality 'construction fatigue' means residents in St Peters losing homes and neighbours and community; roadworks physically dividing communities; sickening odours over several months, incredible noise pollution 24 hours a day and dangerous work practices putting community members at risk. These conditions have already placed enormous stress on local residents, seriously impacting health and well-being. Another 5 years will be breaking point for many residents. How is this addressed in the EIS beyond the acknowledgement of 'construction fatigue'. This is intolerable for the local community who bear the greatest cost of the construction* of the M4 and M5 and the least benefit.

Campaign Mailing Lists : I would like to volunteer and/or be informed about the anti-WestConnex campaigns - My details must be removed before this submission is lodged, and must be used only for campaign purposes and must not be divulged to other parties

Name _____ Email _____ Mobile _____

Attention Director *Infrastructure Projects, Planning Services,* *Department of Planning and Environment* *GPO Box 39, Sydney, NSW, 2001*	Name: D Griffey
	Address: 7 Kay Close
Application Number: SSI 7485	Suburb: Postcode Jamisontown
Application Name: WestConnex M4-M5 Link	Signature:

Please **include** my personal information when publishing this submission to your website
Declaration : I **HAVE NOT** made any reportable political donations in the last 2 years.

I object to the whole of the WestConnex Project, and the specific WestConnex M4-M5 Link proposals as contained in the EIS application, for the following reasons:

- I object to the unfair tolls on this stage of WestConnex to be paid by people living west of Parramatta who need alternative means of travelling north-south to local neighbourhoods. If we had better public transport, eg, a bus service to connect our suburbs, then many of us would not have to drive and this would reduce the traffic congestion.

- Instead of building WestConnex the money should be spent on modernizing the railway signal system so the train service could be improved. This would be a real benefit to the commuters living west of Parramatta. An extension of the rail train system would be of even more benefit than this white elephant of a tollway. I object that the people of Western Sydney were never consulted about it.

- I am outraged that the EIS quotes from studies in favour of tollways done by the big accounting firms, KPMG and Ernst and Young, paid for by Transurban. Transurban owns more tollways in Australia than any other corporation. These studies cannot be regarded as credible.

- It is recognised that drivers from lower income households are more likely to travel longer distances to avoid tolls because of the cost. We have seen this already where commuters have chose to drive on Parramatta Rd not the new M4 with the new tolls. It is unfair that either drivers have to decide to pay the high tolls (capped at $7.95 in 2015 dollars) or drive for longer to avoid the tolls.

- I object to the fact that the WestConnex Traffic Model has not been released to Councils and the community so it cannot be independently assessed. So the EIS just expects us accept the assertions that the tollways will relieve traffic on other roads, particularly Parramatta Rd, despite admitting that the years of construction will make the traffic on Parramatta Rd much worse. How long are we expected to put up with this?

- The NSW government should be seeking ways to reduce emissions. It is not acceptable for the EIS to argue that worsening pollution is not a problem simply because it is already bad. Car emissions are bad for people's health and for the environment. Why is the state government ignoring the bad health impact of increasing the numbers of cars on the road? The costs to the public purse of dealing with the worse health caused by vehicle pollution – particularly for children and older people – are ignored in the EIS evaluation of the costs of the project.

The EIS should be based on actual plans not a concept design. It must be rejected.

Campaign Mailing Lists :I would like to volunteer and/or be informed about the anti-WestConnex campaigns - My details must be removed before this submission is lodged, and must be used only for campaign purposes and must not be divulged to other parties

Name_____ Email_____ Mobile _____

I submit my strongest objections to the M4-M5 Link proposals as contained in the EIS application # SSI 7485, and request the Minister to reject the application and require SMC / RMS to issue a true, not an 'indicative' and fundamentally flawed EIS

Name: Heather Ripley

Signature: [signature]

*Please **include** my personal information when publishing this submission to your website*
***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.*

Address: 2/4a Mosman St.

Suburb: Mosman Postcode 2088

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name:
WestConnex M4-M5 Link

- The EIS acknowledges that four years of M4/M5 construction would have a negative economic and social impact across the Inner West through interrupted traffic routes, slower traffic times, disruption with public transport, interruption with businesses and loss of connections across communities. This finding highlights the need for a proper cost benefit analysis for the project. Such social costs should not simply be dismissed with the promise of a construction plan into which the community has not input or powers to enforce.
- The Air quality data is confusing and is not presented in a form that the community can interpret. The lack of clarity leads to a suspicion that areas of concern are being covered up.
- It is outrageous to suggest that four unfiltered stacks would be built in one area in Rozelle
- The EIS uses maps indicating alignment of the mainline tunnels. It is clear from more detailed reading deep into the EIS (ie 12-57 Sydney Water Tunnels) that the alignment and depths of the tunnels may vary very significantly, after further survey work has been done and construction methodology determined by the construction contractor. The maps provided in the EIS are nothing more than 'indicative' and are misleading the community. The EIS should be withdrawn, corrected and updated, and reissued for genuine public comment based on 'definitive' information.
- The removal of spoil at the Rozelle Rail Yards will lead to the largest amount of Spoil truck movements on the entire Stage 3 project: 517 Heavy truck movements a day, of which 46 are stated to take place at Peak hours. There will also be 10 Heavy truck movements a day from the Crescent Civil Site. The sheer number of trucks on the road will lead to massive increases in congestion. Maps in the EIS have the spoil trucks going to and from these sites from the Haberfield direction on the City West Link. This is also the direction that is being proposed for spoil truck movements from Darley Rd which is said to have 100 Heavy truck movements a day. It is stated that the cumulative effect of truck movements from all sites on the City West Link will be 700 (one way) Heavy truck movements a day and of that 208 will be in Peak hours. This plan totally lacks credibility
- In Leichhardt serious safety concerns about the choice of the Darley Rd site have been raised by the Inner West Council and an independent engineer's report. Despite countless meetings between local residents and SMC and RMS over 12 months, none of the serious and legitimate concerns raised by the residents have even been acknowledged. This is a massive breach of community trust and seriously questions the integrity of the EIS.

Campaign Mailing Lists : I would like to volunteer and/or be informed about the anti-WestConnex campaigns - My details must be removed before this submission is lodged, and must be used only for campaign purposes and must not be divulged to other parties

Name _____ Email _____ Mobile _____

I object to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: ANNMARIE FARRINGTON

Signature: [signature]

*Please **include** my personal information when publishing this submission to your website*
***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.*

Address: 16 MULLENS STREET

Suburb: BALMAIN Postcode 2041

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

◊ I am concerned that while the EIS finds that tolls do weigh more heavily on lower income motorists, there is no serious analysis of the blatant unfairness of letting of private consortium toll people for decades in order to pay for less profitable tollways for wealthier communities.

◊ EIS 6.1 (Synthesis, Page 45) states. "..... this may result in changes to both the project design and the construction methodologies described and assessed in this EIS. Any changes to the project would be reviewed for consistency with the assessment contained in the EIS including relevant mitigation measures, environmental performance outcomes and any future conditions of approval". It is unstated just who would have responsibility for such a "review(ed) for consistency", and how these changes would be communicated to the community. The EIS should not be approved till significant 'uncertainties' have been fully researched and surveyed and the results (and any changes) published for public comment (ie : the Sydney Water Tunnels issues at 12-57)

◊ The EIS states that property damage due to ground movement may occur. We object to the project in its entirety on this basis. The EIS states that 'settlement, induced by tunnel excavation, and groundwater drawdown, may occur in some areas along the tunnel alignment'. The risk of ground movement is lessened where tunnelling is more than 35 metres. However, some tunnelling is at less than 10 metres. This proposed tunnel alignment creates an unacceptable risk of ground movement. In addition, the EIS states that there are a number of discrete areas to the north and northwest of the Rozelle Rail Yards, to the north of Campbell Road at St Peters and in the vicinity of Lord Street at Newtown where ground water movement above 20 milliliters is predicted 'strict limits on the degree of settlement permitted would be imposed on the project" and 'damage' would be rectified at no cost to the owner. would be placed (Executive Summary, xvii - iii). The project should not be permitted to be delivered in such a way that there is a known risk to property damage that cannot be mitigated to an acceptable level of risk.

I wish to submit my objection to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485. The reasons for objecting are set out below.

Name: CATHERINE ADDINGTON

Signature: Catherine Addington

Please include my personal information when publishing this submission to your website

***Declaration** : I HAVE NOT made any reportable political donations in the last 2 years.*

Address: 403/22 Colgate Ave

Suburb: Balmain Postcode 2041

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

- Heritage items - Camperdown. The EIS also acknowledges that the use of a rock-breaker at the outer extents of the project footprint will affect 73 residences, with five heritage items identified as having the potential to be within the 'minimum safe working distance'. While some mitigation 'considered', it is not mandated and the requirement to mitigate is limited to 'where feasible and reasonable'. The mitigation proposed seems in any event to comprise letter-boxing residents about the likely impacts! The protection of heritage items should be mandated, not just considered and there should be a strict requirement to protect such heritage items.

- EIS is Indicative only - Pyrmont bridge Road site - The EIS should not be approved as it does not contain any certainty for residents as to what is proposed and does not provide a basis on which the project can be approved. This is because the EIS states 'the detail of the design and construction approach is indicative only' and is subject to 'detailed design and construction planning to be undertaken by the successful contractors.'

- The EIS gives no information about changes to traffic increases entering the Sydney CBD caused by the Westconnex. Duncan Gay when asked about this, in connection to huge increases of traffic predicted to enter the city from Westconnex at St Peters, would only say that traffic would disperse! So thousands of extra vehicles would magically disperse – where? There is no plan for this. RMS has only just started work to identify which roads will need to be upgraded to deal with these vast numbers of extra vehicles entering the city. So it is impossible to form an understanding of the true Environmental impacts of this project – which is the very purpose of an EIS.

- While the Rozelle interchange remains committed to be opened in December 2023, the design is so preliminary and so complex that it needs to be treated as another stage of the project to ensure that potential private sector funders are willing to invest, knowing they can heavily modify and/or defer the Rozelle Interchange.

- The removal of Buruwan Park for road widening and the realignment of the Crescent is a particular loss of badly needed parkland. This park was established as a nature corridor and a buffer to shield the local residents from City West Link, there are mature trees on this site, it was not intended as a children's recreational area with play equipment, the description in the EIS is inaccurate. Buruwan Park also has a main cycle route running through it. The alternative route being suggested is poor and takes no account of encouraging cycling as a mode of transport. The alternative routes are based on distance only and take no account of time taken or topography. Had this been done then this would have changed the assessment for the removal of the existing cycle/walkway bridge over the City West link. There is also no mention of this bridge being replaced after construction of the Westconnex. This is not acceptable.

Attention Director
Application Number: SSI 7485

Infrastructure Projects, Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Application Name:
WestConnex M4-M5 Link

Name: CATHERINE ADDINGTON

Signature: Catherine Addington

Please include my personal information when publishing this submission to your website.
I HAVE NOT made reportable political donations in the last 2 years.

Address: 403/22 COLGATE AVE

Suburb: BALMAIN Postcode: 2041

I object to the WestConnex M4-M5 Link proposals for the following reasons, and request the Minister reject the application, and require SMC and RMC to prepare a new EIS that is based on genuine, not indicative, design parameters, costings, and business case.

- I strongly object to the WestConnex M4-M5 Link for a multitude of reasons, including :
  - It is a toll road project made for big business, searching for a rationale.
  - It fails to meet the primary objectives of providing a direct motorway connection between Western Sydney and Sydney Airport and Port.
  - The Environmental Impact Statement does not safeguard communities. Government is seeking planning approval to sell the project to the private sector and discharging its responsibility and control for the delivery of the project.
  - There is a lack of strategic justification for the project, No feasible alternatives have been developed or assessed.
  - There will be major impacts on the Anzac Bridge (projected 60% increase in daily traffic) and Sydney City Centre. The EIS forecasts major impacts on bus travel time and reliability.
  - The EIS does not adequately account for impacts on health and air quality. The EIS identifies an additional 5 unfiltered ventilation stacks to be constructed in inner Sydney. In addition local surface roads will be widened and traffic volumes will increase.
  - Lack of alignment with the NSW Government's priorities and policies
  - Major impacts on the community
  - Legacy Impacts and worsening intergenerational equity
  - Other global cities are investing in fast and efficient public transport that truly connects homes and jobs, supports the decentralisation of commercial investment and develops a resilient and equitable city for future generations.

- At the Rozelle Rail Yards site there will be 2 entry/exits for Heavy vehicles off the City West Link. Extra traffic controls are to be set up with extra sequences of traffic light controls to enable spoil trucks to access and exit this site. It is stated there will be 517 Heavy Truck movements as day of which 46 will be in Peak hours, plus 10 truck movements from the Crescent site. Maps showing the truck movements show that all these trucks will use the City West link. Similar maps for Darley Rd dive site also show trucks from there using the City West Link. At a consultation with a Westconnex staff member it was stated that trucks removing spoil from Camperdown dive site would be stationed and called up from James Craig Rd, so there will also be a constant movement of trucks from this location onto the City West Link. The EIS states the cumulative effect of truck movements from all sites onto the City West Link will be 700 one way Heavy truck movements a day and of that 208 will be in Peak hours. This will cause total gridlock. The EIS says other routes maybe considered; there are no details of these. This is unacceptable as it would allow a privately owned SMC to make whatever decisions they saw fit when and if the EIS is approved with no input from the community allowed.

I submit my strongest objections to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name:... [redacted] .....

Signature:... [redacted] .....

Please **include** my personal information when publishing this submission to your website
Declaration : I **HAVE NOT** made any reportable political donations in the last 2 years.

Address: .. [redacted] .....

Suburb: ..... [redacted] .....Postcode... [redacted]

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name:
WestConnex M4-M5 Link

- The EIS states that 'a preferred noise mitigation option' would be determined during 'detailed design'. This is unacceptable and residents have no opportunity to comment on the detailed designs. The failure to include this detail means that residents have no idea as to what is planned and cannot comment or input into those plans. (Executive Summary xvi)

- The EIS states that the Rozelle interchange and the surrounds of the Anzac Bridge are currently close to capacity. With the proposed project construction the area is going to be subjected to a huge increase in vehicle movements throughout the area for 5 years. Even the 'with project' scenario states that this area will experience no improvement and if anything the current situation will be worse. This is totally unacceptable and proves that the whole project is a complete White Elephant. Indeed it is stated in the EIS that the only way to mitigate for this situation by 2033 is for the working population to adjust their work hours. "Due to forecast congestion, some of this traffic is predicted not to be able to start or finish their journey within the peak period. Some drivers will therefore choose to make their journey either earlier or later in the peak period to avoid delay. This behavior is called 'peak spreading'. . ." This is a categorical admission of failure of this complete project and a stupendous waste of Tax Payers money.

- The social and economic impact study notes the high value placed on community networks and social inclusion but does nothing to seriously evaluate the social impacts on these of WestCONnex. Any genuine assessment would draw on experience with the New M5 and M4 East rather than ignoring it. This lack of genuine engagement with social impact reduces the study to the level of a demographic description and a series of bland value statement

- The mechanical ventilation proposed depends on single direction tunnel construction, so how it can possibly work for large curved tunnels on multiple levels is unknown.

- Worker parking – Leichhardt. There is provision in the EIS for only a dozen worker car parks and no provision for the 100 or so workers who will be permanently based at the Darley Road site for up to five years. A major construction site project should not be permitted in a neighbourhood area without allocated parking for all workers. No other business would be permitted to be established without this requirement being satisfied – why is it acceptable for this project? In addition, the EIS proposes the removal of 20 car spaces used by residents on Darley Road and will remove the 'kiss and ride' facility at the light rail stop. This will result in residents being unable to park in their own street and will increase noise impacts from workers doing shift changeovers 24 hours a day.

I submit my strongest objections to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: [redacted]

Signature: [redacted]

Please **include** my personal information when publishing this submission to your website
Declaration : I **HAVE NOT** made any reportable political donations in the last 2 years.

Address: [redacted]

Suburb: [redacted] Postcode [redacted]

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name:
WestConnex M4-M5 Link

- There will be 517 Heavy truck movements a day, of which 46 are stated to take place during peak hours from the Rozelle Rail Yard the largest amount of spoil truck movement on the whole of Stage 3. This will lead to a vast amount of extra noise and air pollution in this area. There will also be disturbance of soil in the old Rozelle Goods Yard which will be heavily contaminated with toxic substances. It is highly probable that there will be lead and asbestos. (as was the case in St Peters) You made no provision for the safe removal of these toxic substances in St Peters and the EIS makes no provision for their safe removal in this area.
- The EIS misrepresents the structure of the Global Economic Corridor and overstates the relationship of the project to centres within it by claiming the Project serves centres in the north of the GEC that it does not.

- I note that in the area of Lilyfield Rd and Gordon Street, the work proposed which would include deep excavation that would result in major adverse impacts on archaeological remains, while other surface works would have localised impacts on archaeological remains that may be present. It is suggested that what are called 'management measures' would be carried out including the development of a Historical Archaeological Research Design which would include an "assessment of any detailed design plans to develop a methodology and scope for a program of test excavation to determine the nature, condition and extent of potential archaeological remains." This is completely unacceptable to me. The community will have no right to any input into this plan or access to independent expert advice. This is all part of an 'approve now', 'research later' approach that will lead to poorly planned unnecessary destruction, a loss of potential community history and understanding.

- The cited 'key customers' that would benefit from the project (long distance, freight, businesses) represent a very small minority of those who are forecast to actually use the project (single occupancy commuter vehicles). The key customers could be served by a far more modest project, given they represent an extremely small proportion of projected traffic on the Project.

- The EIS (Section 3.2) does not set out the specific transport needs addressed by the project but states additional road capacity is required to meet a projected increase in trips. It does not set out any trips, desire lines, demand corridors or growth that the WestConnex project is addressing. As a result it is not possible to assess the project's ability to meet those needs. Nor is it demonstrated that projections in growth in population and employment correlate to traffic demand increase along the proposed M4-M5 Link.

From: [redacted]
Sent:
To:
Subject: FW: Submission Details
Attachments: 228135_EIS T_2017Oct16_1519.pdf

From: system@accelo.comOn Behalf Of [redacted]
Sent: Monday, 16 October 2017 3:20:21 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Name: [redacted]
Email:

Address:
[redacted]

[redacted]

Content:
I object to stage 3 of WestConnex in it's entirety, please see attached document for further details

IP Address: [redacted]
Submission: Online Submission from [redacted](object)
https://majorprojects.accelo.com/?action=view_activity&id=228135

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

[redacted]

Submission to:
Planning Services
Department of Planning and Environment
GPO Box 39, Sydney, NSW 2001

15 October, 2017

Attention: Director – Transport Assessments

Application Number: SSI 7485 Application
Name: WestConnex M4-M5 Link

My family has lived in Rozelle for over 40 years in total, the past 32 years being at our current address. Rozelle represents the best of Australian communities: people care and support each other and are passionate about protecting the unique qualities of a vibrant village. The proposal identified in the EIS threatens the very fabric of our community and puts the health and safety of thousands of people at risk.

Therefore I am writing to express my objection to the proposed Westconnex M4-M5 Link in the EIS for the following reasons and call on the Minister of Planning not to approve it.

The introduction of the EIS clearly states that the information in the EIS is " indicative of the final design only. The reality of this statement means that the project may be completely different to stated plans in the EIS. Furthermore although the EIS indicates what is to be expected when construction begins, it also states that only after Construction Contractors have been engaged would project designs and methodologies be finally worked out and agreed upon. This may result in major changes to the project design and construction methodologies. The community would have no say in this process.

1. The proposed changes at the top of Callan Street where it meets Victoria road creates a safety issue as the westbound traffic on Victoria Road will be in a 60kmh zone and will enter into Callan Street, which is a 10kmh zone. The EIS does not address how cars will be able to make this extreme change in speed as they enter Callan Street. The proposal will not provide a safe condition for drivers on Victoria Road as they approach Callan Street or pedestrians who walk on Callan Street. In addition, Callan Street is a shared zone with cars parked partially on the foot path. This creates limited area for pedestrians to walk and further exacerbates the safety issue mentioned above, putting pedestrians at risk of being hit by drivers entering into Callan Street at high speed. This is totally unacceptable.

2. The proposed substation and ventilation facility at the corner of Callan Street and Victoria road have not been adequately described in the EIS. There is no detail regarding the decibel level of noise emanating from the substation or the ventilation facility, which is likely to exceed allowable levels for a residential area. This is unacceptable and must be addressed.

3. The Concept Design was a woefully inadequate document totally devoid of any real depth of detail in terms of maps, scales, distances with only vague suggestions and glamorized Artist's Impressions of an idealized view of what Stage 3 would be like. It was another

example of current city planning documents that consistently accentuate huge areas of tranquil green spaces with families and children out walking and riding bicycles in idealized parks and suburbs. All this is total PR spin and bears no reality about the real outcome of the build. It bears no reality as to what Stage 3 of Westconnex will be like.

4. The EIS was released just 12 days after the closing date for submissions to the Concept Design. This categorically proves that all the Community Consultations and Submissions to the Concept Design were a total sham. There were at least 800 posts on the interactive map. These were limited as the community only had 140 characters available to make their point which was woefully inadequate. But there were at least 1500 written submissions, some of which were highly detailed and of considerable length. There is no way that all these submissions could have been read, considered, their arguments integrated into the EIS and then for the EIS of 7200 pages to be put together, printed and released 12 days after the the closing date for submissions to the Concept Design. There needs to be a major investigation into this flagrant abuse of the way NSW planning laws have been flouted for the whole of Westconnex and particularly Stage 3.

5. Rozelle Rail Yards and Rozelle Civil Site. It is clear that the most highly affected area of Stage 3 will be the Rozelle area and the massive and hugely complex Rozelle interchange. The suggestion that Westconnex is capable of building this is highly questionable. Nothing like this has been built anywhere else in the world. Considering the simple problems of dust management, noxious gasses and the handling of toxic materials like asbestos that have been so inappropriately dealt with on Stages 1 and 2 by Westconnex this intersection of Stage 3 is a disaster waiting to happen and should definitely not be allowed to proceed without a massive investigation. What has been shown in the EIS is totally inadequate for this project to be allowed to proceed.

6. In the EIS there are indications of what is to be expected in the Rozelle Rail Yards construction site and the Crescent Civil site. But the EIS states that only after construction contractors have been engaged would project designs and methodologies be finally worked out and agreed. This may result in major changes to the project design and construction methodologies. The community will have no input into this process, so the community is totally powerless to be able to comment on what will actually be proposed, how it will be carried out and what will finally be built. This is not acceptable.

7. In the EIS the Rozelle Rail Yards will have 400 car parking spaces for workers. There will be no car parking spaces at the Crescent Civil site. The daily workforce for these sites is stated to be approximately 550. This means that there will be approximately 150 additional vehicles that will not be able to park in the Construction sites on a daily basis. The EIS suggests workers use public transport. If not, they will have to park on local streets in the area. Parking is already at a premium in the surrounding suburbs and is worsening all the time with the success of the Light Rail and out of area commuters daily leaving their cars at the light rail stops. It is totally unacceptable that the local streets accommodate constructors extra vehicles on a daily basis for the construction period of 5 years in an area where parking is already at a premium.

8. There will be 5 entrances/exits to the Rozelle Yards site off Lilyfield Road for light vehicles and 2 entrances/exits for Heavy vehicles off the City West Link. The 2 entrances on the City West Link, one opposite the exit of the Crescent and one 400 metres further West on the City West Link will have to have traffic controls set up to allow trucks to access and exit. This will lead to a big increase in congestion in this area, the main route to Anzac Bridge and Victoria Rd.

9. The proposed work hours for the Rozelle Rail Yards are tunnelling and spoil handling 24 hours a day seven days a week. Civil construction Mon - Fri 7.00am – 6.00pm, Sat 8.00am - 1.00 pm. There will be no night work at The Crescent Civil Site and the daytime hours are stated to be the same as at the Rozelle Rail Yards. However as has been experienced by those at Haberfield and St Peters these hours and especially late and night work have been extended and implemented when the schedule has fallen behind and this has lead to physical and mental stress for many residents through interrupted sleep and loss of sleep especially with children. The roads and sites at night in the area will see a marked increase in noise from truck movements, truck reversing alarms and running machinery. It will also see a marked increase in light during the night hours with site illumination and vehicle head lights as has been experienced in other areas. These problems have not been properly addressed and are not adequately dealt with in the EIS.

10. Many homes around the Rozelle Rail Yards and the Crescent Civil site will be noise affected, some will be highly noise affected. The expected duration of the cumulative works is 120 weeks, almost 3 years, when noise impact will be significant so it is essential that maximum noise mitigation measures are put in place. However the EIS contains only vague details of how mitigation will be carried out. There is no requirement that measures will in fact be carried out to address noise impacts. The approval conditions need to contain specific noise mitigation measures that can be mandated and enforced. Areas that will be particularly highly noise affected are Bayview Crescent and Railway Parade, the Northern end of Rail Yard site and sections of Lilyfield Rd, Hornsey St, Quirk St and Robert St. Given their proximity, receivers located along Lilyfield Rd between Victoria Road and Gordon St which overlook the Rozelle Yards are likely to experience the greatest construction noise impact within the whole Rozelle area.

11. The EIS states that in 2016 extending a tunnel link to the South side of the Gladesville Bridge was seriously considered rather than to the Iron Cove Bridge but this was shelved due to costs. This clearly identifies a major flaw in the design where massive amounts of traffic will be emptied onto the Iron Cove Bridge, which is already above capacity. The resulting bottleneck will back up traffic well within the tunnels and add to the intensity of pollution spewing out of the proposed unfiltered exhaust stacks, especially the one proposed for Victoria Road between Springside and Callan Streets. The link to the Iron Cove Bridge is neither viable, nor necessary in achieving the objectives of this flawed project and should be scrapped.

12. The Rozelle Rail Yards site is the location of 3 Unfiltered Pollution Stacks. There is a fourth stack on Victoria Rd close to Darling St. If the Western Harbour Tunnel is built there will also be a total of 7 Tunnel Portals. Tunnel Portals are also areas of high levels of pollution. It is totally unacceptable that the Pollution Stacks are unfiltered. In 2008 Gladys Berejiklian said of Labor "It's not too late, the Government can still ensure that filtration is a possibility. World's best practice is to filter tunnels. Why won't Labor allow people to sleep at night, knowing their children aren't inhaling toxins that could jeopardize their health now or in the future?" It is totally unacceptable that the tunnels will not be filtered. Recently built tunnels in Tokyo successfully filter 98% of all pollutants.

13. The tunnels under Rozelle/Lilyfield are going to be in three levels. The EIS does not explain what safety procedures are being built into the project to deal with situations like serious congestion, accidents or fire. With a serious hold up on the deepest of these tunnels it is clear that the air quality will very quickly become toxic unless substantial air conditioning is a major part of the design. There is no in depth detail about how these issues are going to be addressed. This is not acceptable.

14. The three Pollution Stacks in the Rozelle Rail yards are shown to be 38 meters high. This is a totally inappropriate location for these Pollution Stacks. The Rozelle Rail Yards are located in a valley. The Stacks will be on land that is approximately 3.5 meters above sea level. Balmain Road between Wharf Rd and Victoria Road is at an elevation of on average 37 meters. Orange Grove Primary School is at an elevation of 33.4 meters. Areas of Hornsey Rd Rozelle are at 28 meters. Around the junction of Annandale St and Weynton St in Annandale the height above sea level is 29meters. All these areas are in close proximity to these stacks. All the pollution being exhausted from these stacks will almost be on the same level as these locations and so will be blowing almost directly into these properties, especially in summer when many windows are open. This is not acceptable. In situations of no wind the pollution will accumulate in this valley area and make the surrounding area highly polluted. This is not acceptable. There are also at least 4 schools of Primary age children well within one kilometer of these Stacks. Young children are the most vulnerable to pollution related disease.

In summary my key Issues are:

1. I am completely opposed to the Stage 3 WestConnex M4-M5 proposal.

2. I completely oppose the Rozelle interchange.

3. I completely oppose the unfiltered exhaust stacks each side of Rozelle.

4. I completely oppose the Iron Cove Tunnel link below Rozelle.

5. I completely oppose the destruction of our suburbs; particularly Rozelle.

I implore the minister to refuse consent for the Stage 3 WestConnex M4-M5 proposals.

Sincerely,

[redacted]

Attention Director *Application Number: SSI 7485* *Infrastructure Projects, Planning Services,* *Department of Planning and Environment* *GPO Box 39, Sydney, NSW, 2001* *Application Name:* *WestConnex M4-M5 Link*	*Name:* [redacted] *Signature:* [redacted] *Please include my personal information when publishing this submission to your website.* *I HAVE NOT made reportable political donations in the last 2 years.* *Address:* [redacted] *Suburb:* [redacted] *Postcode* [redacted]

I object to the WestConnex M4-M5 Link proposals for the following reasons, and request the Minister reject the application, and require SMC and RMC to prepare a new EIS that is based on genuine, not indicative, design parameters, costings, and business case.

- There is no evidence provided in the EIS that the ventilation outlets will be date. The EIS simply states that 'the ventilation outlets would be designed to effectively disperse the emissions from the tunnel and are predicted to have negligible effect on local air quality (xiv, Executive Summary). This is inadequate and details of the impacts on air quality need to be provided so that the residents and experts can meaningfully comment on the impact.

- Rozelle Interchange and surrounds will experience increased traffic with associated noise and air pollution– most particularly at the Crescent, Johnson St and Catherine St, Annandale/Lilyfield/Leichhardt and Ross Street, Glebe. These streets are already highly congested at peak times and with a massive number of extra truck movements and traffic associated with construction, these streets will become gridlocked during peak times

- The EIS does not mention the impact of aircraft noise and its cumulative impact. As such, the noise levels identified are misleading. I object to the selection of the Darley Road site because of the unacceptable noise impacts it will have on surrounding homes and businesses.

- This EIS provides no basis on which to approve such a complex project including the building of interchanges underneath Sydney suburbs Rozelle and Leichhardt. It would be absurd to approve the building of up to three tunnels under people's homes on the basis of such flimsy information

- The impact of the deep tunnelling for the M4-M5 link - in addition to the tunnelling for the new Sydney Metro in the same area - in the Tempe, Sydenham, St Peters, Newtown and Camperdown and beyond is an unknown hazard to the soundness of the buildings above, and given that two different tunnelling operations will take place quite close, the people in those buildings will struggle to get repairs and compensation for loss because either contractor will no doubt blame the other. The increasing numbers of vehicles will also increase the vehicle pollution (known to have adverse effects on breathing and also to be carcinogenic) in this area.

- The EIS refers to be construction impacts as being 'temporary'. I do not consider a five year construction period to be temporary.

I submit my strongest objections to the M4-M5 Link proposals as contained in the EIS application # SSI 7485, and request the Minister to reject the application and require SMC / RMS to issue a true, not an 'indicative' and fundamentally flawed EIS

Name: [redacted]

Signature: [redacted]

*Please **include** my personal information when publishing this submission to your website*
***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.*

Address: [redacted]

Suburb: [redacted] Postcode: [redacted]

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name:
WestConnex M4-M5 Link

- The City West Link Eastbound AM and PM peak hour and other locations."Table 7-19 shows that several locations are forecast to exceed theoretical roadway capacity with the increased background traffic and the construction traffic in the 2021 AM and PM peak hours. However, traffic on the majority of these roads would exceed their theoretical capacity even without the construction traffic, simply due to the growth in background traffic". So in the full knowledge that this area will be at capacity in 2021, massive amounts of construction traffic are going to be added for the whole construction period of 5 years. Even on completion it is stated in the EIS that traffic will be worse in this area than 'without the project'. This categorically shows that the planning of Westconnex is totally inadequate and needs major changes. It also shows that when completed Westconnex will not work. It is abundantly obvious that Rail/Metro is the only option to radically overhaul Sydney's failed transport systems

- I am completely opposed to approving a project in which the Air quality experts recommend rather than filtrating stacks extra stacks could be added later.

- 2 G Appendix P Table 5-27 of the EIS states that 43% of the Leichhardt- Glebe Precinct travel to work by Car, 21% by Bus and 5%by Rail. These are figures for 2011. These figures are being used to promote the project and suggest they are accurate today. In the case of Rail these figures are extremely questionable. The Light Rail is now hugely popular, it's use having grown enormously. It is travelling at full capacity at Peak hours. More services are being put in place. Apartment blocks are being built as close to the Light Rail corridor as possible. Residents see the Light Rail as an efficient, reliable and timely method of commuting to work. It is blatantly obvious that the Govt should be investing heavily in building and extending Light Rail, Metro and Rail. If this were pursued in a professional manner the necessity for trying to hoodwink the community into believing that Westconnex were needed would be totally unnecessary.

- The EIS was prepared by global engineering firm AECOM, which also prepared the EIS for Stages 1 and 2. When he approved these earlier stages, the then Minister for Planning Rob Stokes pointed to conditions of approval that would minimise impacts on communities. But the impacts have turned out to worse than expected.

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: Lena Novaelos
	Address: 6/40 Evans St
Application Number: SSI 7485	Suburb: Balmain Postcode 2041
Application Name: WestConnex M4-M5 Link	Signature:
Please include my personal information when publishing this submission to your website Declaration: I HAVE NOT made any reportable political donations in the last 2 years	

I object to the whole of the WestConnex Project, and the specific WestConnex M4-M5 Link proposals as contained in the EIS application, for the following reasons:

a. Table 6.1 in Appendix Q (Social and Economic impact) is not an accurate report on the concerns of residents. It downgrades the concerns of Newtown, St Peters and Haberfield residents. It does not even mention concerns about additional years of construction in Haberfield and St Peters. It also does not mention concerns about heritage impacts in Newtown. I can only assume that this is because there was almost no consultation in Newtown and a failure to notify impacted residents including those on the Eastern Side of King Street and St Peters.

b. Heavy vehicle movements during peak hours – Leichhardt. The EIS states that 'reasonable and practical management strategies would be investigated to minimize the volume of heavy vehicle movements during peak hours.' (8-53). This is also not acceptable as it is not known what will actually be done to manage this impact. It is not good enough for the EIS, which forms the basis of the approval of this project, to simply mention 'investigations' and not detail a proper plan (on which residents can comment) on management of heavy vehicle movements during peak hours. In addition, Darley Road is very congested from 7am until 9.30am and then from 4pm-6.30pm, well outside the 'peak' periods identified in the EIS. And the impact on traffic will be caused by 'light' vehicles and not simply heavy vehicles. It is clear that there is no plan for managing these vehicle movements. The EIS should not be approved as drafted. It is unacceptable for this volume of vehicles to be proposed for this critical arterial road with no plan for management

c. The mainline tunnel alignment was influenced by a number of factors between Haberfield and St Peters. It is very concerning that one of these factors, states that this route was decided on for: "Future connections to the motorway network". This is of particular concern in the light of the Camperdown interchange removal. Westconnex was forced to remove this interchange due to pressure from the RPA Hospital, Sydney University and The Chinese Embassy. Knowing that the Camperdown Interchange was wanted it is highly concerning to see this reference to future motorway connections but no disclosures outlining where these connections maybe. The EIS also states that in 2016 extending a tunnel link to the South side of the Gladesville Bridge was seriously considered rather than to the Iron Cove Bridge but this was shelved due to costs. In light of the way residents and home owners have been dealt with by Westconnex the fact that other areas are being considered for add on sectors to this project is of great concern.

d. The removal of spoil from the Rozelle Rail Yards will lead to the largest number of spoil truck movements on the entire Stage 3 project: 517 Heavy truck movements a day, of which 46 are stated to take place during peak hours. This will lead to extra noise and air pollution in this area.

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: Georgia Hardy
	Address: 5/8 Sunnyside Ave
Application Number: SSI 7485	Suburb: Lilyfield Postcode 2040
Application Name: WestConnex M4-M5 Link	Signature:

Please include my personal information when publishing this submission to your website

Declaration: I HAVE NOT made any reportable political donations in the last 2 years

I object to the whole of the WestConnex Project, and the specific WestConnex M4-M5 Link proposals as contained in the EIS application, for the following reasons, and request the Minister reject the application.

1. The key intersection performance tables in App H (p.258 St Peters and 248 Rozelle) demonstrate that many intersections will either worsen (at the worst case scenario of LOS F) or remain unchanged particularly in 2033, including the following intersections:
   - Princes Highway/Canal Road
   - Princes Highway/Railway Road
   - Unwins Bridge Road/Campbell Street
   - Campbell Road/Bourke Road
   - Princes Highway/Campbell Street
   - Ricketty Street/Kent Road
   - Gardeners Road/Kent Road
   - Gardeners Road/Bourke Road
   - Gardeners Rd/O'Riordan Street
   - Victoria Road/Lyons Road
   - Victoria Road/Darling Street
   - Victoria Road/Robert Street

2. I object to this new tollway because in the past tolls have been justified as needed to pay for the new road. This is not the case of this tollway that will charge tolls for 40 years. This is only to guarantee revenue to the new private owner.

3. The proponent excludes the impact of the Western Sydney Airport from analysis of the project. This could have a significant impact on traffic volumes.

4. The modelling shows significant increases in traffic on Victoria Rd (+20% ADT) which is already at capacity.

5. Most people in Emu Plains, Penrith, Mt Druitt, or Blacktown who work in Sydney CBD use the trains. What workers travelling to Sydney city really need are better and more frequent trains. This is just dismissed by the EIS.

6. Most people in Emu Plains, Penrith, Mt Druitt, or Blacktown who work in Sydney CBD use the trains. What workers travelling to Sydney city really need are better and more frequent trains. This is just dismissed by the EIS.

7. The modelling shows the motorway exceeds reasonable operating limits in the peak in less than ten years.

8. The underlying traffic modelling and outputs was insufficient to:
   - Demonstrate the need for the project.
   - Understand impacts of dispersed traffic on connecting roads, such as the Anzac Bridge, and whether they have available capacity to meet the predicted traffic discharge. Any congestion on exits has the capacity to negate all travel time savings to the exit point, given the small predicted benefits.

9. Public transport is rejected by the EIS so the state government is forcing us to use cars more when most major cities in the world are trying to reduce the number of cars on the roads. We know this is to promote private road operators' profits. I object to putting so much public funding to the cause of private profit. I urge the Secretary of Planning to reject this project.

Submission from:	Submission to:
Name: Georgia Hardy Signature: G Hardy *Please **include** my personal information when publishing this submission to your website* ***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.* Address: 5/8 Sunnyside Ave Suburb: Lilyfield Postcode 2040	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001 Attn: Director – Transport Assessments Application Number: SSI 7485 Application Application Name: WestConnex M4-M5 Link

I submit my objection to the WestConnex M4-M5 Link as contained in the EIS application # SSI 7485, for the following reasons, **and ask that the Minister reject the application and require preparation of a genuine, not indicative, EIS**

- *I strongly object to the proposed location of this permanent operational facility on Darley Road. The presence of this site contradicts repeated assurances to the community that the site would be returned after construction was completed. The ongoing presence of this site will limit future uses of the darley Road site which could serve community purposes, particularly given its location directly next to public transport. Its presence removes the ability to provide more accessible, safer and direct pedestrian access to the North Leichhardt Light Rail Station. The plant location, in a neighbourhood setting is not appropriate. It will reduce property values and have an unacceptable impacts on the visual amenity of the area. The streets adjacent to Darley Road are comprised of low-rise residential homes and small businesses and infrastructure such as this should not be permitted in such a location.*

- *The Rozelle Rail Yards are a totally inappropriate area to create a new recreational area because the area will be highly polluted by unfiltered Pollution Stacks and Tunnel Portals. In the EIS it is referred to as an idealized area."It is envisaged that the quantum of active recreation within the Rozelle Rail Yards would be further developed by others as projects such as The Bays Precinct are developed. The concept plan provides spaces that could include an array of active recreation opportunities and even community facilities such as gardens or a school." The suggestion that this would be a suitable location for a School is just beyond belief and demonstrates that those who have put these plans together are either staggeringly ignorant or totally delusional! At a time when major World cities are doing all they can to address the dire problems of pollution this is an appalling suggestion that is totally out of touch.*

- *The EIS is misleading because it discusses the creation of 14,350 direct jobs during construction. It omits the fact that jobs have also been lost because of acquisition of businesses, many of which were long-standing and employed hundreds of workers. (Executive Summary xviii)*

- *Insufficient time has been given for the community to prepare submissions to the EIS, especially when one considers that whole neighbourhoods affected by the project were not even notified during the concept design period. e.g Newtown, east of King St.*

- *Acquisition of Dan Murphys – I object to the acquisition of this site on the basis that Dan Murphys renovated and started a new business in December 2016, in full knowledge that they were to be acquired, with the acquisition process commencing early November 2016. This is maladministration of public money and the tax payer should not be left to foot the compensation bill in these circumstances.*

I object to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: Georgia Hardy

Signature: G Hardy

*Please **include** my personal information when publishing this submission to your website*

***Declaration**: I **HAVE NOT** made any reportable political donations in the last 2 years.*

Address: 5/8 Sunnyside Avenue

Suburb: Lilyfield Postcode 2040

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

- The Project will have significant impacts on the streets near on- and off-ramps. Modelling shows that the Anzac Bridge will have 60% more traffic in 2033 because of the Project.

- The modelling assuming journey time shifting when mode shifting is more likely.

- The modelling does not consider the latest plans from the NSW Government's Greater Sydney Commission despite them being released nine months ago.

- I object to the whole project because the people of Western Sydney were not consulted about where they wanted new roads or what transport they prefer. The WestConnex project with the tolls we will have to pay was just dumped on us, there was no consultation about our needs.

- The management of water in the Rozelle Yards is of great concern as the site is highly contaminated and the construction work that will be carried out will cause a great deal of disturbance especially once vegetation has been removed. There will be potential impacts from contaminated soils, leakage/spills of hydrocarbons and other chemicals from machinery, vehicles transporting spoil adjacent to roads and stormwaters, rinse water from plant washing and concrete slurries. Water from tunnelling activity and other works will also introduce contaminants. The EIS says that much of this water will be treated in temporary treatment facilities and sediment tanks before being released to Whites Creek and Rozelle Bay. The EIS does not disclose what levels of pollution controls will be implemented to make sure that contaminated water is not released into White's Creek or Rozelle Bay. This is not acceptable.

- The project directly affected five listed heritage items, including demolition of the stormwater canal at Rozelle. Twenty-one other statutory heritage items of State or local heritage significant would be subject to indirect impacts through vibration, settlement and visual setting. And directly affected nine individual buildings as assessed as being potential local heritage items. It is unacceptable that heritage items are removed or potentially damaged and the approval should prohibit such destruction.(Executive Summary xviii)

- Residents of Haberfield should not be asked to choose between two construction sites. This smacks of manipulation and a deliberate attempt to divide a community. Both choice extend construction impacts for four years and severely impact the quality of life of residents. NSW Planning should reject the impacts on Haberfield as unacceptable. (page 106)

Attention Director *Application Number: SSI 7485* *Infrastructure Projects, Planning Services,* *Department of Planning and Environment* *GPO Box 39, Sydney, NSW, 2001* *Application Name:* *WestConnex M4-M5 Link*	*Name:* L. DITTON *Signature:* L. Ditton *Please include my personal information when publishing this submission to your website. I HAVE NOT made reportable political donations in the last 2 years.* *Address:* 5 King St. *Suburb:* BALMAIN *Postcode* 2041

I submit my objection to the WestConnex M4-M5 Link proposals for the reasons stated below, and request the Minister reject the application entirely, and cause the proponents to reissue an EIS that is based on a fully researched, developed, and budgeted concept design, and require the proponents to prepare a new business case against that design.

- The nature of proposed "post-opening mitigation measures" (Page 223, Chapter 9.8, Appendix H) are unknown and their impacts could be significant including intersection and road widening (and associated property loss), banning parking in local centres, removal of trees, footpaths and cycling facilities. The people of NSW have a reasonable expectation to understand whether such impacts form part of the Project and they should be detailed in the EIS. They should not be left to a "wait and see" approach. Not only a proper analysis of demand, but also of traffic dispersion should be provided for connecting roads up to three kilometres from every exit and entry portal and the capacity of those roads analysed.

- Road congestion is reducing bus performance and reliability. The project will make it worse.

- The EIS says traffic on ANZAC Bridge will increase by 2023 (p.8-103).

- Traffic modelling shows bus times will be slower into the city in the morning (p.3-19).

- The EIS identifies capacity constraints on ANZAC Bridge (p3-19). This project will dump more traffic onto the ANZAC Bridge.

- The statements made that public transport cannot serve diverse areas are empirically incorrect. The area the Westconnex is being built in has higher public transport mode use than the Greater Metropolitan Area as noted in the IES.

- The EIS notes that the project design and land use forecasts have changed significantly since the Stage 2 and Stage 3 EIS. However the cumulative analysis does not quantify the expected change on those roads. The EIS only notes significant increases in traffic volumes.

- I object to the whole project but particularly the tolls which are unfair when people living west of Parramatta really need alternative to western neighborhoods north-south. If we had better public transport then many of us would not have to drive and this would reduce the traffic.

- The modelling has thousands of unreleased cars at key locations; i.e. in reality those unreleased vehicles would result in vehicle queues and or network failure.

- The strategic model (whole system) inputs traffic volumes that simply cannot be accommodated in the road interchanges and feeder routes. It is physically impossible to fit that amount of traffic on a road.

I submit my strongest objections to the M4-M5 Link proposals as contained in the EIS application # SSI 7485, and request the Minister to reject the application and require SMC / RMS to issue a true, not an 'indicative' and fundamentally flawed EIS

Name: Antoinette Kent

Signature:

*Please **include** my personal information when publishing this submission to your website*
***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.*

Address: 7 Clare St

Suburb: Rozelle Postcode: 2039

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name:
WestConnex M4-M5 Link

- Additional facilities. The EIS states that the contractor may decide upon additional 'construction ancillary facilities' to the 12 identified in the EIS. The EIS should not be approved on the basis that there may be more unidentified sites taken, as residents will have no opportunity to comment on their impacts. The approval condition should limit any construction facilities to those already notified and detailed in the EIS.

- The process that has led to this EIS has been undemocratic and obscure, driven by decisions made behind closed doors.

- The EIS states that darley Road is a contaminated site, and likely has asbestos. The proposal is that 'treated' water will be directly discharged into the stormwater drain at Blackmore oval. There are four long-standing rowing clubs in the vicinity of this location. This plan will jeopardise the integrity of our waterway and compromise the use of the bay for recreational activities for boat and other users. We object in the strongest terms to this proposal on environmental and health reasons. There is no detail of the ongoing Motorway maintenance activities during operation provided in the EIS. The community therefore cannot comment on the impact that this ongoing facility will have on the locality. This component of the EIS should not be approved as this information is not provided and therefore impacts (on parking, safety, noise, amenity of the area) are not known.

- Rozelle is an old and historic suburbs of Sydney. The damage that this project would do in destruction of homes, other buildings and vegetation is unacceptable, especially when the project would leave a legacy of traffic congestion in the area.

- Permanent water treatment plant and substation – Leichhardt The proposal to locate this permanent structure in a residential setting is opposed. The site will have a negative visual impact on the area and is in direct line of sight of a number of homes. If approved, the facility should be moved to the north of the site further from homes.

Attention Director *Application Number: SSI 7485* *Infrastructure Projects, Planning Services,* *Department of Planning and Environment* *GPO Box 39, Sydney, NSW, 2001* *Application Name:* *WestConnex M4-M5 Link*	*Name:* Lee Tennent *Signature:* Lee Tennent *Please include my personal information when publishing this submission to your website. I HAVE NOT made reportable political donations in the last 2 years.* *Address:* 68 Curtis Rd *Suburb:* Balmain *Postcode* 2041

I submit my objection to the WestConnex M4-M5 Link proposals for the reasons stated below, and request the Minister reject the application entirely, and cause the proponents to reissue an EIS that is based on a fully researched, developed, and budgeted concept design, and require the proponents to prepare a new business case against that design.

◊ Other planning issues are excluded from cost-benefit analysis, which is a key component of developing a business case:

- No analysis of equity impacts of the infrastructure investment and the tolling regime, given the lower socio-economic status of many areas of Western Sydney, and the requirement for potential users of WestConnex to own or pay for access to a private vehicle to be able to use it
- The localised impact of air quality around the ventilation outlets should have been accounted for.
- Impacts associated with loss of amenity from reduced access to open space should have been accounted for.

◊ There will be major impacts on the Anzac Bridge with a projected increase of 60% in daily traffic. There will also be major impacts to the Sydney City Centre. The EIS states that this will lead to major impacts on bus travel time and reliability. The EIS's suggests that people will have to adjust their travel times to starting for work earlier and finishing later. This is unacceptable and underlines Westconnex's waste and total failure.

◊ Lack of ability to comment on the urban design as part of the approval process - The EIS does not provide any opportunity to comment on the urban design and landscape component of the project. It states that 'a detailed review and finalisation of the architectural treatment of the project operational infrastructure would be undertaken ;during detailed design'. The Community should be given an opportunity to comment upon and influence the design and we object to the approval of the EIS on the basis that this detail is not provided, nor is the community (or other stakeholders) given an opportunity to comment or influence the final design.

◊ The Westconnex has been described as an integrated transport network solution. This is totally untrue as the role and integration with public transport and freight rail has not been assessed. The Government recently committed to a Metro West so this throws into question the need for Westconnex. This is especially so as the Westconnex business case outlines a shift from public transport to toll roads as a benefit. This needs to be justified economically. The EIS does not do this.

◊ The EIS is a strategy only document, it does not commit to any design and it therefore does not address any local impacts created by the proposed M4-M5 Link. Rather it prepares the pathway for sale of the Sydney Motorways Corporation to the private sector, removing from the responsibility, oversight and control of the Government the final design, cost and implementation of the M4-M5 Link.

Attention Director
Application Number: SSI 7485

Infrastructure Projects, Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001
Application Name:
WestConnex M4-M5 Link

Name: RENEE LECUSSAN

Signature: [signature]

Please include my personal information when publishing this submission to your website. I HAVE NOT made reportable political donations in the last 2 years.

Address: 7 CLARE ST

Suburb: ROZELLE *Postcode* 2039

I submit my objection to the WestConnex M4-M5 Link proposals for the reasons stated below, and request the Minister reject the application entirely, and cause the proponents to reissue an EIS that is based on a fully researched, developed, and budgeted concept design, and require the proponents to prepare a new business case against that design.

- *The EIS (including Appendix H) fails to provide traffic modelling outputs to assess impacts of the Project on CBD streets and intersections. Given the highly constrained and congested nature of the CBD, NSW Government policy focusses on reducing the number of cars in the CBD in favour of public transport, walking and cycling. The proponent should provide intersection performance results for the following intersections:*
  a) *The ANZAC Bridge off-ramp to Allen Street/Botany Road*
  b) *The Western Distributor off-ramp to Druitt Street (buses)*
  c) *The Western Distributor off-ramp to Bathurst Street*
  d) *The Western Distributor off-ramp to King Street/Sussex Street*
  e) *Gardeners Road and Botany Road*
  f) *All intersections within the modelled area in the Sydney CBD*

- *The traffic model used is an 'unconstrained' model. It assumes that all vehicles will travel on the route with the lowest "generalised cost" (i.e. combination of time and money). But it does not consider whether those routes have the capacity to handle all those vehicles. In the real world people change their time of travel, mode of travel and consider whether to make a trip at all to avoid congested routes. As a result travel patterns in the real world are very different to the patterns identified in models.*

- *Better use of existing road infrastructure has not been analysed as a feasible alternative. The EIS only refers to existing RMS programs. An analysis of urban road projects recommended in the State Infrastructure Strategy Update 2014 should be conducted as strategic alternatives including:*
  a) *Smart Motorways investments on the M4, the Warringah Freeway and Southern Cross Drive-General Holmes Drive*
  b) *Upgrading the Sydney Coordinated Adaptive Traffic System (SCATS)*

- *The EIS refers to benefits from road projects that are not part of the project's scope. The full costs, benefits and impacts of these projects need to be considered in a transparent process.*

I wish to submit my objection to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485. The reasons for objecting are set out below.

Name: PATRICK LANGLOIS

Signature:

Please include my personal information when publishing this submission to your website

Declaration : I HAVE NOT made any reportable political donations in the last 2 years.

Address: 65 CURTIS RD

Suburb: BALMAIN Postcode 2041

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

- The Rozelle Rail Yard stacks are stated to be 38m high and are situated in a valley area. The majority of Balmain Road is 39m above sea level and Annandale St is at 29m above sea level. Both are considerably less than 1 kilometre from the Rail Yard stacks so pollution will be blown directly into many homes in these areas. This will expose the residents of Annandale, Lilyfield, Rozelle and Balmain to highly increased health risks.

- The proposed work hours for the Rozelle Rail Yards Site are tunnelling and spoil handling 24 hours a day seven days a week. On ground construction Mon-Fri 7.00am – 6.00pm, Sat 8.00am- 1.00pm. However as has been experienced by those at Haberfield and St Peters these hours and especially late and night work have been extended and implemented when the schedules have fallen behind and this has lead to great physical and mental stress for many residents through interrupted sleep and loss of sleep especially for those with children. The roads and sites at night in the area will see a marked increase in noise from truck movements, truck reversing alarms and running machinery. It will also see a marked increase in light during the night hours with site illumination and vehicle head lights as has been experienced in other areas. These problems have not been addressed in the EIS.

- The Rozelle Rail Yards site is the location of 3 Unfiltered Pollution Stacks. There is a fourth stack on Victoria Rd close to Darling St almost opposite Rozelle Primary School. If the Western Harbour Tunnel is built there will also be a total of 7 Tunnel Portals. Tunnel Portals are also areas of high levels of pollution. It is totally unacceptable that the Pollution Stacks are unfiltered. Recently built tunnels in Tokyo successfully filter 98% of all pollutants. There are at least 5 schools and childcare centres in close proximity to these pollution stacks.

- Noise impacts - Camperdown The EIS indicates that a large number of residents will be affected by construction noise caused by demolition and pavement and infrastructure works. This includes use of a rock breaker and concrete saw. During all periods of construction, there will be noise impacts from construction of site car parking and deliveries and pavement and infrastructure works. No proper mitigation measures are proposed to protect residents from these impacts (10-118, EIS) The EIS admits that three residents and two businesses will be subject to noise impacts above acceptable levels for 16 days (10-119, EIS) No detail is provided as to whether alternative accommodation will be offered or other compensation.

From: [redacted]
Sent: Mon, 16 Oct 2017 07:42:12 +0000
To: [redacted]
Subject: FW: Submission Details for Peter Koulouris (object)

From: system@accelo.comOn Behalf OfPeter Koulouris
Sent: Monday, 16 October 2017 6:42:04 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Peter Koulouris (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Peter Koulouris
[redacted]

Address:
[redacted]

Concord, NSW
2137

Content:
I oppose the whole Westconnex project however the Rozelle interchange is irrational in a growing city and should be refused.

A media article today said Sydney could have 2.2M more people by 2036 - everyone cannot drive and this growth needs to be supported with mass transport options not more motorways

[redacted]
Submission: Online Submission from Peter Koulouris (object)
https://majorprojects.accelo.com/?action=view_activity&id=228265

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent:
To:
Subject: FW: Submission Details

From: system@accelo.comOn Behalf Of[redacted]
Sent: Monday, 16 October 2017 6:43:02 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Name: [redacted]
Email:

Address:
[redacted]

[redacted]

Content:
I object to the proposed unfiltered Iron Cove smokestack being located less than 100 metres from homes and Rozelle Primary School. I ask that it be moved to the Rozelle Goods Yard and no stack installed or constructed at the Iron Cove entrance. Rozelle Interchange Project Manager Peter Jones has said he would prefer the stack to be moved to the Goods Yard, that SMC have the technology to move it there without detriment to tunnel safety, that it will reduce construction and remediation costs, and that SMC and the contractors will move it if stakeholders demand it

IP Address: [redacted]
Submission: Online Submission from [redacted] (object)
https://majorprojects.accelo.com/?action=view_activity&id=228267

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent:
To:
Subject: FW: Submission Details

From: system@accelo.comOn Behalf Of[redacted]
Sent: Monday, 16 October 2017 6:54:06 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Name: [redacted]
Email:

Address:
[redacted]

[redacted]

Content:
I'd like to add my voice to the thousands who have already objected to the Westconnex project in its entirety, and to every partial element within, including the M4-M5 Link, the St Peters interchange and those parts of the road constructed to date.

The health, environmental, social and economic impacts of car dependence are well-documented and clearly understood by the department and the NSW government. They are immense. Respiratory and lifestyle disorders directly correlate with car use and a lack of active travel options. Exorbitant road projects are continually justified by the presence of the previous road project, as the new beaches link shows. Market-led planning time and again brings gold-plated, over-engineered roads which do not understand cities and the way that they are moving globally, but rather take Sydney backwards. This is not about a liveability ranking, this is about living. We have to find alternatives to car use for both the health of the planet and our citizens.

The cost-benefit of Westconnex is horrendously flawed, and if it weren't, would still not represent value to the taxpayer. Cars kill, and the department needs to be bold in the face of the road lobby to advocate for active transport, starting with heavy rail and including cycling, walking and buses. Roads should be getting narrower, not wider. This road fails Western Sydney as much as it does the inner ring.

I know that NIMBYism is a challenge to the department and it's easy to see the residents of the inner west and south as classic, propertied NIMBYs. I am 27, a renter, pro-development, and welcome the metro projects underway, some small road projects such as Northconnex, and the current focus on housing density, whether or not others do. I don't care about so-called 'heritage' lost in Haberfield or the disruptive impacts of building infrastructure. But Westconnex is, on its merits, the worst project we'll see in our lifetime, and in Sydney that's saying something.

I urge you to do all in your power to consider the alternatives put forward by bodies such as the City of

Sydney, or the group of UNSW academics, advocating for a 21st century solution to the very real problems of urban mobility in this sprawling metropolis. I want others to have the access to Sydney's beautiful inner areas that I have - and the only way to do that is to densify the core, promote active transport generally and build rail specifically. Please stop any further construction on Westconnex.

Much obliged,

[redacted]

IP Address: [redacted]
Submission: Online Submission from [redacted](object)
https://majorprojects.accelo.com/?action=view_activity&id=228273

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent: Mon, 16 Oct 2017 08:03:13 +0000
To: [redacted]
Subject: FW: Submission Details for Jim Donovan (object)

From: system@accelo.comOn Behalf OfJim Donovan
Sent: Monday, 16 October 2017 6:45:08 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Jim Donovan (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Jim Donovan
[redacted]

Address:
[redacted]

Lindfield, NSW
2070

Content:
The fundamental problem with the whole Westconnex project is that its objectives are specified too narrowly. They are so narrow that the preferred work to meet the objectives can only be a new tolled motorway. Our planners should recognise that we're not here to build a road but rather to build a city. We should have targets for reducing greenhouse gas emissions, for reducing vehicle kilometres travelled, for reducing accidents, for clean air etc etc.

It is usually the case that smaller projects have more favourable benefit cost ratios than large projects. That alone should make our planners recommend projects other than huge pieces of new infrastructure that disrupt whole neighbourhoods merely to get land for their interchanges.

We should start again with a master plan for Sydney that sets attainable density targets and sets out an attainable transport plan to suit. In particular, we should eliminate the contradiction in the current master plan that wants both better public transport and bigger inner-suburban motorways.

Building Westconnex, especially when it is intended to extend it with Southconnex to Heathcote and Western Harbour Tunnel and Beaches Link, is contrary to Sydney's best interests.

[redacted]
Submission: Online Submission from Jim Donovan (object)
https://majorprojects.accelo.com/?action=view_activity&id=228271

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent: Mon, 16 Oct 2017 03:48:01 +0000
To: [redacted]
Subject: FW: Submission Details for company Action for Public Transport (NSW) Inc. (org_object)
Attachments: 228112_westconnex_stage3_submission_2017Oct16_1443.pdf

From: system@accelo.comOn Behalf OfJim Donovan
Sent: Monday, 16 October 2017 2:44:11 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for company Action for Public Transport (NSW) Inc. (org_object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Jim Donovan
[redacted]

Address:
[redacted]

Haymarket, NSW
1240

Content:
See attached PDF

[redacted]
Submission: Online Submission from company Action for Public Transport (NSW) Inc. (org_object)
https://majorprojects.accelo.com/?action=view_activity&id=228112

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

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

APT NSW

P O Box K606
Haymarket NSW 1240
16 October 2017

SSI 16-7485 WestConnex M4-M5 Link

Submission on EIS

Action for Public Transport (NSW) is a transport advocacy group active in Sydney since 1974. We promote the interests of beneficiaries of public transport - both of passengers and the wider community. We make this submission on the Environmental Impact Statement dated August 2017 for the WestConnex stage 3 M4-M5 link.

Discussion

We note the following flaws in the EIS:

- **Vagueness**

  The EIS abrogates major design decisions, deferring them to later study, particularly the proposed Rozelle interchange. The missing details therefore cannot be taken into account in assessing the impact of building and operating the M4-M5 link. The legality of this incomplete EIS is questionable.

- **Failure to consider public transport alternatives**

  The EIS fails to consider relevant public transport alternatives. Part of the reason for this might be a deplorable NSW Cabinet policy - *The Sydney Morning Herald* of 15 June 2017 had an article by Peter Martin citing a directive not to consider public transport alternatives to the proposed F6 extension.

  Other cities aren't making the same mistake. For instance Seattle is facing population growth of around 3% per year. Despite being much smaller than Sydney and therefore presumably able to rely on cars to a greater extent, Seattle has commenced a package called Sound Transit 3. According to an article in the Seattle Times of 27 April 2017:

  > With Sound Transit 3, voters authorized a 25-year, $54 billion package containing 62 new miles of light rail, stretching from Tacoma to Everett, as well as increased commuter rail and bus service.
  >
  > By the time the system is complete, it will have 116 miles of light rail, more than five times the amount that is in service today between Angle Lake and the University of

Washington.

- **Failure to consider demand management alternatives**

The EIS fails to consider all relevant demand management alternatives. In particular, there is no discussion of road access pricing.

Road access pricing is receiving increased attention in the literature. For example, Professor David Hensher had an article in *The Sydney Morning Herald* on 11 March 2016 which said:

> We need to begin a journey away from fixed charges, such as car registration, to use-based charges.
>
> At the Institute of Transport and Logistics Studies we showed a while ago that for the Sydney metropolitan area, if you halved registration charges and introduced a 5¢ per kilometre peak period charge, then almost every driver would be better off financially (as would state Treasury, though the federal government would lose out on some fuel excise due to reduced distance travelled by cars).
>
> It would result in a 6 per cent drop in peak traffic (similar to traffic drop during school holidays), which makes a huge difference to the performance of the road network. It also a way of ensuring that those who benefit for the time savings under the new reform also pay.
>
> To convince people we are talking sense, take a simple example of typical peak period kilometres in Sydney per year (4000 kilometres out of the typical yearly average 12,500 kilometres for private cars). Halving registration charges should save on average $200 a year and 4000 kilometres with a peak charge at 5¢ per kilometre is $200 so it is cost neutral. We could reduce registration charges even more, as per the view of Infrastructure Australia, and then saving to motorists is greater than $200 (possibly as great as $500).

Road access pricing is also receiving attention in Canberra. An article published in *The Conversation* dated 12 September 2016 by Marion Terrill and Owain Emslie states:

> Road user charging is probably the best idea we have to reduce congestion and to enable better decisions on road investment. Average travel speeds in our cities are decreasing, and congestion is only likely to worsen as our population continues to grow.
>
> Urban Infrastructure Minister Paul Fletcher recently gave an important speech, albeit largely unnoticed, in which he made the case for a universal road user charging scheme. Charging people to drive has previously been the dream of transport and economic policy wonks - serving politicians tend to see the idea as political poison.
>
> Fletcher trod gently, cautioning his Sydney Institute audience that "there is a lot of work to do" and that any move in this direction would be "a ten to 15-year journey". It is still remarkable that a federal minister even took these first steps.

A very recent paper on the subject is "Stuck in traffic? Road congestion in Sydney and Melbourne" by Terrill available at https://grattan.edu.au/report/stuck-in-traffic/ which recommends *inter alia*:

> The NSW and Victorian governments should introduce congestion charging. People who want to drive on congested roads in the peak should pay a small charge to do so. The revenue should be returned to the community as discounts on car registration, and improvements to public transport. And as more toll roads are introduced, state

governments should ensure they have the flexibility to adjust future tolls to manage traffic flows.

- **Irrelevance of the project to its aims**

  The EIS (Executive Summary, page v) justifies the project on grounds including the need to handle an extra five million trips per day. It is inconceivable that the whole WestConnex system could cope with anything like that number of trips. For comparison, the Sydney Harbour Bridge and Sydney Harbour Tunnel between them have 12 traffic lanes which handle about 300,000 3km trips per day. WestConnex, with a maximum of perhaps six lanes, has no chance of making a significant impact on five million trips, many of which will be well over 10km.

  Another way of presenting the same issue, although measured on the whole of WestConnex rather than just the M4-M5 link, can be seen in an article by Chris Standen published in *The Sydney Morning Herald* on 17 August 2016:

  > Sydney already has a very high capacity road network by global standards - one which now handles about 110 million vehicle kilometres (VKT) a day, or 31.9 kilometres for every licensed driver.
  >
  > Now the NSW government is spending $17 billion on the 33-kilometre WestConnex tollway, which will increase daily VKT by 0.5 percent, to 32.1 kilometres per licensed driver. Put another way, the Baird government is spending $7000 for every household in the state, and bulldozing homes, heritage areas, parks and trees, just so the average motorist can drive an additional 200 metres a day. And the road network will still be congested.

  Expanding Sydney's transport system to cope with an extra five million trips per day would be very difficult but the most promising steps to take would include land-use changes to reduce the need for long trips and also expansion of public transport facilities. WestConnex works against both of those.

  The fallacy in the Executive Summary is compounded in Chapter 8 - Traffic and Transport. According to section 8.1.1 (Strategic transport context, page 8-3), "WestConnex is also an enabler of integrated transport and land use planning, supporting the development of initiatives including The Bays Precinct and the Parramatta Road Corridor Urban Transformation Strategy". That's false. The whole WestConnex strategy shows no credible co-ordination of transport planning with land-use planning. WestConnex's capacity falls far short of what those two initiatives require. Shortcomings of Bays Precinct are well-known, if only because Google decided not to move its offices to Glebe Island, citing lack of public transport. And the Parramatta Road corridor UTS was cut back in 2015-2016 from 50,000 homes to 27,000 homes plus some employment area when it became obvious that transport would be inadequate *despite* WestConnex. Even if the WestConnex tunnels were dedicated to buses or other public transport, the route chosen does not fit public transport's needs because it avoids denser centres such as Burwood and the CBD. Rather than enabling these developments, WestConnex consumes resources which should instead go into the public transport that is clearly required; WestConnex therefore works against Bays Precinct and Parramatta Road Corridor UTS.

- **Out-of-date map**

  Figure 8-1, entitled "Sydney travel demand corridors" is misleading. Its age is evident by the absence of Western Sydney Airport and the old names "Southwest growth centre" and "Northwest growth centre". It might be intended to show demand for cars to travel which would limit its usefulness in planning transport for people.

While it is pleasing that the EIS claims to recognise induced traffic, there is no acknowledgement that the

attempt to clear congestion is self-defeating. The 2015 Project Overview on Westconnex's "New M5" candidly acknowledged (page 9) that the "old" M5 East was congested within just six months of its opening in 2001, and now experiences the slowest typical travel speeds of any of Sydney's main motorways.

Conclusion

We do not think that the EIS proposal can be justified.

Recommendation

We recommend that the EIS be rejected.

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

From: [redacted]
Sent:
To:
Subject: FW: Submission Details for [redacted] object)

From: system@accelo.comOn Behalf Of[redacted]
Sent: Monday, 16 October 2017 7:12:07 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for [redacted] (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: [redacted]
Email:

Address:
[redacted]

[redacted]

Content:
I object to this application SSI7485.

From my own experience, the M4 East EIS has grossly inadequate and we as residents have felt the brunt of its many failures. Questions remain as to what steps will be taken to ensure those failures are not repeated.

I would hope that strict conditions will be put in place and enforced. In the past this has not happened. Heavy vehicles continue to use Bland Street, much to the denial of WestConnex.

Our home has also been subject to cracking, but as we were outside the standard area, we were denied any real investigation of our claim. The cracking continues and will only get worse as tunnelling commences under our home.

From my reading of the EIS, it is extremely unclear as to when, where and how noise level data was conducted. As a resident of Bland Street I can attest to the fact that since one side of Wattle Street was demolished, noise has substantially increased. It should be obvious that the removal of brick and mortar, and a great deal of vegetation would have a detrimental effect on the local amenity. It is apparent that little or no mitigation strategies have been employed. Nothing contained in the EIS would seem to indicate any change.

I have attempted in the past to obtain details of noise and vibration monitoring stations, ie, locations, operating times, without success.

The same applies to air quality monitoring. I would also suggest that it would be appropriate to conduct indoor air quality assessments of nearby residents.

The EIS appears to indicate that containing roadways in tunnels will minimise health impacts but I have continued concerns with pollutants surfacing at the tunnel portals. This will be the case at a number of portals in and around Wattle Street, and on Parramatta Road.

This will further be exacerbated by the proposed Options A and/or B. These options completely contradict the original M4 East consultations where it was stated that there would be not above ground construction sites other than those already in place.

Neither Option A or B are acceptable, nor is any hybrid combination of the options. The fact that such sites would operate for many years to come will have further health impacts and disruptions for local residents.

The Muirs site was originally sought by the SMC and/or WestConnex, but negotiations were stopped. Given the obscene amount that the Dan Murphy site will cost the taxpayer, I shudder to think how much the Muirs site will cost.

The fact is that the proposed usage of this site will further increase traffic in Bland Street and possibly endanger the many young school children at Haberfield Public School.

As to the statement regarding dust mitigation, I suggest that a tour of Wattle Street be undertaken. It seems the contractor's compliance leaves a lot to be desired. I don't mind washing my car, but not every few days.

"In all areas evaluated, there are no noticeable increases in noise from construction traffic on the proposed routes during the daytime or night-time." That statement provides a great source of amusement. Movements at night have definitely increased and sound carries further at night. Ask any nearby resident.

Concerns of treatment of asbestos remain real. There have been media reports of breaches of asbestos management. My own experience was laughable. I requested entry to my childhood home, which has since been demolished. I was denied internal access as asbestos removal was in train. When I asked where the signs were I was given a different reason.

I am concerned about the health aspects for my wife and myself. With noise emanating from worksites almost 24/7, lack of sleep is a huge issue. One of the supposed noise mitigation methods is the movement between work sites after a few nights. That is almost pointless when the worksites are only 150-200 metres apart.

The fact that this proposal will see another 5-6 years of construction work is a daunting prospect, for us personally and indeed our neighbours and community. We receive little respect from the SMC, and no respite from the noise. The delivery of movie tickets to some residents proves how entirely out of touch the SMC is with day-to-day residential woes.

Adding to these mental issues is the disconnection of Haberfield from surrounding suburbs, part destruction of public housing amenity and the financial effects on local businesses. From my experience not one business owner has been compensated in any way.

It is apparent that normal regulations as to work times have been circumvented by the contractors. The continual drone is simply unacceptable and is not adequately addressed in this EIS.

As a resident I have had cause to write to the SMC/WestConnex to raise various issues but have received no joy. Who's in charge?

Not the Minister. I wrote to Stuart Ayres and I received a response from Samsung. It begs the question as to who is in charge of the State Significant Project.

I had a heated conversation during one of public consultation meetings. I was eventually told I was wrong by the human resources manager. Probably a little outside his area of expertise I would have thought.

Again, let me say we face another six years.

I object to this proposal and make the following requests -

* that better management of impacts and proper mitigation be required before any approvals are given.

* that the Minister ensures that Westconnex current projects modify practice through revised conditions of approval and that new projects operate under more stringent and socially responsible practices.

* that confirmation be given as to when noise measurements were taken across the M4-5 link footprint. If data is out of date it must be revised.

* that, as part of the conditions of approval, there be no commencement of works unless mitigation measures are available and ready to be installed i.e. mobile sound walls closer to source of sound (sound blankets on mobile cages able to be moved and positioned closer to the source of sound, better baffling than we have experienced with the M4 East) acoustic covering of jet fans and ventilation equipment.

* that the Department of Planning & Environment (DP&E) planning assessment and approval team for the M4-M5 consults with residents directly from along both the M4 East and New M5 routes about their lived experiences of WestConnex building, PRIOR making a determination on the M4-M5 Link application.

* that DP&E assessment and approval team run a series of workshops with residents, from different locations, who have or are willing to engage with the EIS PRIOR to approval and AFTER release of the Preferred Infrastructure Report.

* that as part of the conditions of approval, improved communications and complaints mechanisms are developed and implemented as part of any approval process.

* that, as part of the conditions of approval, there is local project public liaison officer in at every construction site or area. Residents need to be able to make direct contact, in person, and not just through a service centre.

* that as part of the conditions of approval, an independent complaints Ombudsman be appointed.

* that as part of the conditions of approval the Department of Planning to establish and oversee neighbourhood group meetings and liaison, between local residents with relevant construction and project employees.

* that as part of the conditions of approval there be regular, advertised monthly resident drop-in sessions held either on site, or in the local area with DPE compliance team/post approval teams, EPA, IWC Westconnex Unit reps. At quarterly intervals reps from Safe Work NSW, RMS, TfNSW, Transport Management Centre, SLHD, Primary Health Network, and technical and senior people from the contracted Project builder (as opposed to community engagement team) should be present. The project builder should finance, but not control the administration of these sessions.

* that as part of the conditions of approval that there up to date project community notice boards at each construction site, and also at central project notice boards in other suitable locations, i.e. shopping centre, library, civic centre.

* that, as part of the conditions of approval, that noise mitigation measures are in place, i.e. mobile sound walls closer to source of sound, acoustic covering of jet fans and ventilation equipment be put in place

PRIOR to commencement of works.

* that, as part of the conditions of approval, all project, utility and associated work slip notices, letters, notifications, published public notices, Agency and Government notices and letters (gazetted or not) as well as the Local Updates should go onto a community notice board as well as a website.

* that, as part of the conditions of approval, there are hardboard and illuminated pedestrian notices re detours, road changes and bus stop closures or relocations.

* that, as part of the conditions of approval, there be no construction work or utility work unless noise and dust mitigation measures are in place.

* that, as part of the conditions of approval, there be no use of off road diesel equipment (ie, Diesel generators).

* that, as part of the conditions of approval, Indoor air quality monitoring occur inside nearby schools and homes, prior to and during the project life.

* clarification of the project PM burden on buildings over 3 storeys upon air quality, and new developments and concentration of high rise buildings along transport corridors.

* clarification of PM burden from the project and reasons for locality based PM burden referred to in the EIS.

* that as part of the conditions of approval, that appropriate independent regulatory, supervision and compliance resources are funded by the proponents and provided, to ensure that conditions of approval are observed and met at all times.

* that, as part of the conditions of approval, there be substantially improved communication with blind, vision impaired, deaf or hearing impaired, non-English speaking, or English speaking but functionally illiterate people, as well as residents who are socially isolated, or with limited mobility.

* that, as part of the conditions of approval, there be substantially improved liaison with tenants, public or private.

* that, as part of the conditions of approval, there be proper induction, training and better supervision of road traffic controllers.

* that, as part of the conditions of approval, there be regular mandatory disability audits from qualified person/service re all aspects of project impacts in local community - (a safety officer from the M4 East project has admitted he was not qualified to assess and make appropriate suggestions on this topic).

* that tolls only be increased in line with the CPI.

In closing, approval must not be granted on the basis of this EIS. The proponent needs to review, revise and re-submit the EIS to DP&E so it can be re-exhibited, in combination with the Preferred Infrastructure Report to ensure proper public engagement.

I urge the Secretary of NSW Planning to advise the Minister to reject this EIS, publish my name and submission in accordance with the undertaking on your website, and provide a written response to each of the matters I have raised in my objection.

IP Address: [redacted]
Submission: Online Submission from [redacted] (object)

https://majorprojects.accelo.com/?action=view_activity&id=228277

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent: Mon, 16 Oct 2017 08:18:16 +0000
To: [redacted]
Subject: FW: Submission Details for Jennifer Killen (object)

From: system@accelo.comOn Behalf OfJennifer Killen
Sent: Monday, 16 October 2017 7:18:06 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Jennifer Killen (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Jennifer Killen
[redacted]

Address:
[redacted]

St Peters, NSW
2044

Content:
I object to the EIS in its entirety. As a teacher, I object because of the health and social effects it will have on children across Sydney and as a resident of St Peters, a suburb which has borne the brunt of inner city construction, I object because of its effects on me and my friends.

Education effects
Many students have already been affected because of the noise and dirt that is generated and which affects schools which are adjacent to construction zones. Students who cannot hear their teachers and their peers do not learn.

Research shows that the ongoing, permanent effects of the extra traffic and air pollution generated by this proposal has the potential to cause intellectual and developmental delay in my students, especially those who attend schools close to the unfiltered exhaust stacks.

St Peters School would be "neatly" triangulated between two sets of unfiltered exhaust stacks which rise up above the Princes Highway. The prevailing winds in our neighbourhood are from the east, so the exhaust from the stacks will blow over the school whether the wind is coming from the south or the north. Other stacks affect other schools, notably in Rozelle.

Local Effects
I live in Hutchinson Street, St Peters, a narrow one-way street, running off Campbell St.

We have already seen most homes in Campbell St and Campbell Rd demolished to make way for the St Peters Interchange, which is being built on an old toxic rubbish dump. Amongst the homes demolished was a heritage cottage, one of the oldest buildings in the city, and a rare surviving workers cottage. One of my oldest friends has lost his house and business. He has had to move far from here because he was not paid the market value of his house and was unable to buy another house in this area. As retirees, we

now find it difficult to meet up due to the distance that now exists between our homes.

Social disruption to the lives of elderly people has been shown to have significant negative effects on their health.

I will no longer be able to walk across Campbell Street to visit friends in Brown, Florence, St Peters and Church Streets. Simpson Park will become unpleasantly noisy and air quality will decline. People from the other side of Campbell Street, especially elderly and disabled people, will find it very difficult to visit Simpson Park. Parents with small children will feel inhibited from using the park because of the risks associated with crossing a busy, multi-lane road.

Additional reliance on cars, and reduced opportunities for walking and cycling as a day to day form of transport (rather than occasional recreational activity in parks and other special areas) has negative effects on health at a population level as well as for individuals.

None of this is addressed in the the EIS assessment for which there has been no actual assessment at all of the experience of residents during the Stage 2 New M5.

Three ventilation stacks are planned for St Peters The St Peters' three-level interchange is down the hill from my home but prevailing winds will blow the exhaust gases in my direction. . There will be a massive double ventilation exhaust stack on the south-western corner of the interchange for the new M5 from Kingsgrove and for the stage 3 of WestConnex (M4-M5 link) there will be a huge ventilation stack for the exit and entries for the tunnels under Newtown to Haberfield and Rozelle on the north western corner of the site.

The Environmental Impact Statement for Stage 3 actually admits that the traffic around St Peters will be worse when both stages are completed. So we will have to put up with the exhaust from the tunnels and the additional car emissions from the traffic. Car emissions are known to shorten the lives of those who live within half a kilometre of a busy roadway. Diesel exhaust from trucks is classed as a carcinogen.

The plans for this motorway project mean that I might be the first generation of my family to have a lifespan shorter than my parents and grandparents.

We need more public transport and not more motorways. This proposal must be rejected.

[redacted]
Submission: Online Submission from Jennifer Killen (object)
https://majorprojects.accelo.com/?action=view_activity&id=228279

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

[redacted]

From: Jennifer Killen <campaigns@good.do>
Sent: Monday, 16 October 2017 6:31 PM
To: DPE CSE Information Planning Mailbox
Subject: Submission to WestConnex New M4/M5 EIS, project number SSI 16_7485

Attn: Secretary, re: WestConnex M4/M5 EIS, Project Number SSI 16_7485.

I object to the proposals contained in the WESTCONNEX M4/M5 LINK EIS.

The effects that this project would have on my community, were it to be approved in its current form are not properly addressed in the EIS. Hence the Secretary of Planning should advise the Minister to refuse the application.

It is difficult to comment properly because the EIS does not actually tell us exactly what will be built, or where it will be built.

NSW Planning should recommend a halt to the planning process and an independent review of WestConnex before more money is wasted and more residents' lives are damaged.

Residents all over Sydney, experts, Councillors and even potential investors have all queried the information supplied by the Sydney Motorway Corporation and NSW Roads and Maritime Services. In this situation, it would be unprofessional of NSW Planning to rubber stamp this inadequate document.

The EIS states 'the detail of the design and construction approach is indicative only based on a concept design and is subject to detailed design and construction planning to be undertaken by the successful contractors.' The community will have no opportunity to comment on the Preferred Infrastructure Report which forms the basis of the approval conditions. Key decisions have been left open in this EIS. Not to allow consultation on the final choice of construction sites would further compromise an already inadequate consultation process.

SMC was required to consider alternatives. This section in the EIS is extremely superficial and fails to come to grips with debates in the field of transport planning. The City of Sydney came up with a well thought out alternative plan and this has been ignored in the EIS. The SMC should be required to engage with this plan and to respond to it. Any responsible system of planning governance would require that.

I completely reject the notion that unfiltered pollution stacks should be built anywhere in Sydney, let alone three or four in a single area. I am particularly concerned that schools would be near such unfiltered stacks. NSW RMS is currently reviewing this policy. A draft of this review should be published for public comment before this planning process is completed

With four unfiltered emissions stacks in Rozelle, two in Haberfield (one each for the M4East and New M5) and two in St Peters, along with a large number of exit portals, residents of these area will suffer greatly from direct exposure to poisonous diesel particulates.

This is negligent when you consider that the World Health Organisation in 2012 declared diesel particulates carcinogenic.

I am also very concerned about the impact of WestConnex on that residents and workers living near local roads which become even more congested as a result of WestConnex. The is research evidence that it is dangerous to live close to congested roads. I reject an approach to transport planning which allows a government authority to approve a project knowing that it will place some residents at increased risk of life threatening impacts.

The noise and air quality studies are completely dependent on the accuracy of the traffic analysis and assumptions. If the traffic analysis is flawed, so too are the air and noise studies and local road traffic impacts. City of Sydney experts and other academic experts have already rejected the traffic analysis on which WestConnex bases its case. Only last

week Citi financial analysts in a report to their large investors were of the view that the traffic predictions contained were unlikely to be achievable. They are arguing that due to toll avoidance and the opening of Badgery's Creek airport, the actual traffic figures will be lower than predicted. In this situation, it would be negligent for NSW Planning to approve this project.

I object to the indicative design for the Rozelle Interchange. Sydney Motorway Corporation has not been able to identify any other similar underground interchange project anywhere in the world or find a construction company to build it. This EIS should be rejected because it would be absurd to approve such a design concept without evidence that it could be constructed. It would also be absurd to place conditions on a project for which even the most basic details are not known.

I also object to a project which will add to congestion on local roads in the Alexandria, Newtown, Enmore and Erskineville areas. The EIS does not adequately model the impact on local roads of Stage 3. I am concerned that the final result will be that King Street will become a 24 hour clearway, which would kills a vibrant Sydney area.

I object to the use of Darley Rd, Leichhardt as a dive site. The site cannot accommodate the projected traffic movements without jeopardising the road network. Darley Road is a critical access road for the residents of Leichhardt and the inner west to access and cross the City West Link. As the EIS acknowledges, this route is already congested at peak hours. The intersection at James Street and the City West link already has queues at the traffic lights. The only other option for commuters to access the city West Link is to use Norton Street, a two-lane largely commercial strip which is already at capacity. The addition of hundreds of trucks and contractor vehicles will result in traffic grinding to a halt and traffic chaos at this critical juncture with commuter travel times drastically increased.

I object to the acquisition of this site on the basis that Dan Murphys renovated and started a new business in December 2016, in full knowledge that they were to be acquired, with the acquisition process commencing early November 2016. This is maladministration of public money and the taxpayer should not be left to foot the compensation bill in these circumstances. With the Premier having now been referred to ICAC over the lease extension granted over this site, it is very clear that there has been a lack of transparency in the dealings with this site.

The inadequate traffic analysis shows that even if this tollway and all other proposed tollways are completed, the St Peters Interchange and Frederick Street in Ashfield will be considerably more congested in 2033 if the project goes ahead.

I am also concerned that the traffic figures relied upon in the EIS are simply not reliable. AECOM, the company responsible for this EIS, has a well-documented record of wrongly predicting traffic. Already there are reports that the traffic for all stages of WestConnex has been overestimated and construction costs underestimated.(SMH 'Pressure builds on government to sweeten WestConnex sale' 5/10/2017)

Reductions of volumes of traffic on Parramatta Rd, King Georges Road or the existing M5 are asserted but the model which projects these effects is not provided for scrutiny or independent assessment. The model's margin for error is not stated. The rest of the benefits all depend on the asserted traffic reductions generating improved travel times and better bus services or freight movement etc. So far the experience of the growth of traffic on Parramatta Rd in response to the re-imposition of tolls on the widened section of the M4 gives us leave to doubt these touted benefits.

The Social and Economic Impacts report refers to the socio-economic impact of tolls on Sydney communities. Toll avoidance would be a major impact of this project. The investigation and analysis of the impact of tolls is not adequate and underestimates the social, economic and health burden it will place on residents for decades to come.

There is reference in the EIS to the WestConnex Road Traffic Model version 2.3 (WRTM v2.3), a strategic traffic model that has been used in the traffic analysis. There is insufficient explanation of the nature of the model, where it can be accessed and what function it plays in the analysis. Since so much else in the EIS including noise and air quality predictions are dependent on this forecasting, the lack of transparency makes it difficult for the EIS to be subject to independent critique.

When measuring the impacts in the EIS, it is important to bear in mind the mismanagement of the project to date and residents have little confidence that any measures set out in the approval document will, in fact, be complied with. During 2017 residents in St Peters have been subject to appalling odours which have damaged the health of some community members and damaged the quality of life of many more. SMC has failed to comply with the environmental protection licence that it was granted as part of previous approvals. NSW Planning has shown that it

does not have the powers to enforce compliance. In this situation conditions are meaningless. I am appalled that there is a significant risk that these odours would continue if Stage 3 is approved. I would strongly object to the NSW EPA granting a license for this project on the basis of this application and with no clear plan for how contamination would be controlled. No community should be treated in this manner.

I am also concerned that Haberfield and Ashfield residents are being given the apparent choice of two construction plans, Option A or Option B, both of which will have severe impacts on the community. In fact the EIS hints at other options that have not been fully disclosed.

It was promised, and was a condition of the M4 East approval that in 2019, all Haberfield and Ashfield above ground WestConnex construction sites were to have been dismantled, as well the Urban Design and Landscape Plan (UDLP) completed and Legacy Project 'surplus lands and property' delivered back to the community. These promises were still being reiterated in early 2017, when there was community consultation on how surplus land would be restored to the community in 2019. It is a matter of grave concern that these promises are now been ignored as if they did not happen. NSW Planning should investigate this situation.

There are overlaps in the construction periods of the New M5 and M4 of up to one year. This will significantly worsen impacts for residents close to construction areas. No additional mitigation or any compensation is offered for residents for these periods.(Executive Summary xxvii). It is unacceptable that residents should have these prolonged periods of exposure to more than one project. The EIS makes no attempt to seriously research the current impacts on residents, measure what the cumulative impacts would be or make suggestions that would mitigate the cumulative impact of these prolonged periods of construction noise exposure.

The EIS identifies a significant risk of leaks of contaminated water into Rozelle Bay and Alexandria Canal. Such risks to health of Sydney's waterways is not acceptable to me.The Sydney Motorway Corporation through its conduct at St Peters has shown that it cannot be trusted to manage contamination risks. I am completely opposed to the residents of St Peters being exposed to a high risk of being impacted by gases from exposed landfill for a further three years. The NSW EPA should not grant any further licenses that would allow such events to occur.

I object to the EIS on the grounds that it fails the Secretary's requirement for "meaningful" consultation. Hundreds of submissions on the concept design, including a major one from the Inner West Council, were ignored. Consultation is not the provision of glossy brochures, light on detail, which minimise the negative aspects of a project and state that ever impact will be managed by a 'plan'.

The heritage report ignores potential impacts on hundreds of homes in Newtown and Rozelle which are part of Sydney's valued history. This report is incomplete and should not be accepted. Given that the EIS acknowledges that buildings can be damaged by tunnelling, there should have been a full report on all heritage buildings within the tunnel project boundaries.

I urge the Secretary of NSW Planning to advise the Minister to reject this EIS, and publish my name and submission in accordance with the undertaking on your website, and provide a written response to each of the objections I have raised.

Yours sincerely, Jennifer Killen 55 Hutchinson St, St Peters NSW 2044, Australia

_____ This email was sent by Jennifer Killen via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol FC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Jennifer provided an email address (jk@zeta.org.au) which we included in the REPLY-TO field.

Please reply to Jennifer Killen at jk@zeta.org.au.

To learn more about Do Gooder visit www.dogooder.co To learn more about web protocol FC 3834 visit: www.rfc-base.org/rfc-3834.html

From: [redacted]
Sent: Mon, 16 Oct 2017 08:42:13 +0000
To: [redacted]
Subject: FW: Submission Details for Jon OKeby (object)

From: system@accelo.comOn Behalf OfJon OKeby
Sent: Monday, 16 October 2017 7:42:04 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Jon OKeby (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Jon OKeby
[redacted]

Address:
[redacted]

St Peters, NSW
2044

Content:
To whom that couldn't give a toss about us:

Well what an overwhelming amount of information to digest in 60 days. An impossible task unless you were employed to do it. This obviously wasn't designed to get serious discussion from the residents.

My main objection is that this EIS does not cover the area is proposed to cover. Where is any mention of Mary St, St Peters, NSW 2044? This happens to be the road that connects to the other side of Canal Road travelling west past the Princess Highway. Ignoring the impact of this development on this street and the surrounding area renders this document a farce.

After we have been smothered in dust, inundated with the stench of decay, sleepless night from continuous thumping, neighbours evicted, roads jammed with speeding trucks etc etc this is the EIS? I think your live in another land, we live in a war zone.

How hard it must have been to find a venue in St Peters to have a community meeting or display the EIS. Sydenham was the best that could be done I guess after destroying our community.

It must be hard to look at yourselves in the mirror and think what a great job you have done.

Shame, shame, shame.

Yours sincerely,

Mr J. Okeby
48 Mary St
St Peters

NSW 2044

[redacted]

Submission: Online Submission from Jon OKeby (object)
https://majorprojects.accelo.com/?action=view_activity&id=228287

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent: Mon, 16 Oct 2017 08:49:10 +0000
To: [redacted]
Subject: FW: Submission Details for Peter Fletcher (object)
Attachments: 228289_ Peter Fletcher WestConnex EIS Feedback October 2017_2017Oct16_1943.pdf

From: system@accelo.comOn Behalf OfPeter Fletcher
Sent: Monday, 16 October 2017 7:45:15 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Peter Fletcher (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Peter Fletcher
[redacted]

Address:
[redacted]

Rozelle, NSW
2039

Content:
I have some concerns relating to the WestConnex M4-M5 link Stage 3, in particular the link from the M4-M5 to Rozelle relating to congestion around Rozelle both during and after construction, and risks associated with noncompletion of later projects.

WestConnex was originally proposed to link the M4 and the M5 to Sydney Airport. With a large population increase in the area around Sydney Airport, traffic congestion has greatly increased, making the airport, a critical piece of infrastructure, increasingly inaccessible by road.

The original plan for WestConnex has been altered, with the proposed link to Sydney Airport removed, and a new spur linking the M4 and M5 motorways with Rozelle and the Anzac Bridge. Other projects being proposed will create motorway links between Rozelle and the Iron Cove Bridge and a new Western Harbour Tunnel.

There are currently no plans to construct a motorway link between the M4/M5 and Sydney airport. However, as congestion increases in the vicinity of the Airport, there is a risk that congestion becomes so bad that construction of such a link becomes a priority.

This might result in delays in other planned stages of Sydney motorways, such as the Western Harbour Tunnel.

While it is to be hoped that the Western Harbour Tunnel link will reduce traffic through the city, the link to the Iron Cove Bridge cannot reduce congestion at Victoria Road in Drummoyne, which is already at full capacity in peak times and can only increase. Congestion can only be reduced if two tunnels are built to connect the Anzac Bridge to the Gladesville Bridge with tunnels under both Rozelle and Drummoyne.

However, planning for the Iron Cove Bridge link and the Western Harbour Tunnel is incomplete, and it is not clear where the funding for these projects is coming from. It is easy to envisage situations in which these projects are substantially delayed, or never completed at all: for example, inability to secure funding, a change of government, priorities changing to other projects, or delays due to construction problems or legal battles.

I am extremely concerned that if the Rozelle link proposed for WestConnex Stage Three is completed without either the Iron Cove Bridge connection or the Western Harbour Tunnel, then traffic congestion will become appalling in the vicinity of the Anzac Bridge. This bridge is already at full capacity during peak-hour traffic, and with further traffic brought into the area from the WestConnex link, traffic on the Anzac bridge may well come to a standstill. Aside from inconvenience for the commuters, this will also result in heavy clogging of local streets in Rozelle, Lilyfield and Glebe, including Victoria Road, The Crescent, and smaller streets in the vicinity.
I believe that the Rozelle connection to WestConnex should not be constructed during Stage Three of the project, because there is a high risk that if further stages are not completed, this connection will permanently increase congestion on the western side of the city. I urge that you do not consider constructing the stage of this project until plans for a link to Gladesville Bridge and a Western Harbour Tunnel are certain to eventuate.

I hope you will be able to consider and address these important concerns.

[redacted]
Submission: Online Submission from Peter Fletcher (object)
https://majorprojects.accelo.com/?action=view_activity&id=228289

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

Feedback on EIS WestConnex M4-M5 Link

I have some concerns relating to the WestConnex M4-M5 link Stage 3, in particular the link from the M4-M5 to Rozelle relating to congestion around Rozelle both during and after construction, and risks associated with noncompletion of later projects.



WestConnex was originally proposed to link the M4 and the M5 to Sydney Airport. With a large population increase in the area around Sydney Airport, traffic congestion has greatly increased, making the airport, a critical piece of infrastructure, increasingly inaccessible by road.

The original plan for WestConnex has been altered, with the proposed link to Sydney Airport removed, and a new spur linking the M4 and M5 motorways with Rozelle and the Anzac Bridge. Other projects being proposed will create motorway links between Rozelle and the Iron Cove Bridge and a new Western Harbour Tunnel.

There are currently no plans to construct a motorway link between the M4/M5 and Sydney airport. However, as congestion increases in the vicinity of the Airport, there is a risk that congestion becomes so bad that construction of such a link becomes a priority.

This might result in delays in other planned stages of Sydney motorways, such as the Western Harbour Tunnel.

While it is to be hoped that the Western Harbour Tunnel link will reduce traffic through the city, the link to the Iron Cove Bridge cannot reduce congestion at Victoria Road in

Drummoyne, which is already at full capacity in peak times and can only increase. Congestion can only be reduced if two tunnels are built to connect the Anzac Bridge to the Gladesville Bridge with tunnels under both Rozelle and Drummoyne.

However, planning for the Iron Cove Bridge link and the Western Harbour Tunnel is incomplete, and it is not clear where the funding for these projects is coming from. It is easy to envisage situations in which these projects are substantially delayed, or never completed at all: for example, inability to secure funding, a change of government, priorities changing to other projects, or delays due to construction problems or legal battles.

I am extremely concerned that if the Rozelle link proposed for WestConnex Stage Three is completed without either the Iron Cove Bridge connection or the Western Harbour Tunnel, then traffic congestion will become appalling in the vicinity of the Anzac Bridge. This bridge is already at full capacity during peak-hour traffic, and with further traffic brought into the area from the WestConnex link, traffic on the Anzac bridge may well come to a standstill. Aside from inconvenience for the commuters, this will also result in heavy clogging of local streets in Rozelle, Lilyfield and Glebe, including Victoria Road, The Crescent, and smaller streets in the vicinity.

I believe that the Rozelle connection to WestConnex should not be constructed during Stage Three of the project, because there is a high risk that if further stages are not completed, this connection will permanently increase congestion on the western side of the city. I urge that you do not consider constructing the stage of this project until plans for a link to Gladesville Bridge and a Western Harbour Tunnel are certain to eventuate.

I hope you will be able to consider and address these important concerns.

Yours Sincerely,

Name: Peter Fletcher

Address: 56 Lilyfield Road Rozelle

Email: peter@traal.org

(I allow for my personal details to be published)

From: [redacted]
Sent: Mon, 16 Oct 2017 09:14:54 +0000
To: [redacted]
Subject: FW: Submission Details for Josephine Wadlow-Evans of www.foxandchickens.org (object)
Attachments: 228125_Airsafe Asbestos Site Clearance Certificate and Air Monitoring figures 2002 ref Asbestos Chapter 7_2017Oct16_1507.pdf, 228125_Asbestos Timelines Footnotes_AsbestosDump_Workcovergaveclearancecert_standingbesidedump_2017Oct16_1507.pdf, 228125_JUSTICE IS THE WILL OF THE PEOPLE_2017Oct16_1507.pdf, 228125_Sub 113 Lane Cove Tunnel Action Group_2017Oct16_1507.pdf, 228125_sub86_Kearney-3_2017Oct16_1507.pdf

From: system@accelo.comOn Behalf OfJosephine Wadlow-Evans
Sent: Monday, 16 October 2017 3:08:38 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Josephine Wadlow-Evans of www.foxandchickens.org (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Josephine Wadlow-Evans
Organisation: www.foxandchickens.org (CEO)
[redacted]

Address:
[redacted]

Drummoyne, NSW
2047

Content:
My submission is attached in Adobe form together with submissions from previous developments - Stage 3 EIS M4/M5.....

My submission is referred to as Justice is the will of the people....highlighting the danger that thousands within the Inner West are being deliberately exposed to especially under the flight path, and contained within the submission is the level of damage to the community being covered by organophosphates contained in aviation fuel, and which the WHO has called - the asbestos of the skies' from the inbound and outbound aircraft...what aircraft pilots, staff and passengers are being subjected to inside the aircraft cabins is exposing, unfiltered, the Inner West community to...which includes high levels of 'lead' contained in 'prop aircraft' fuel...

This is yet again a case of deja vu - or rather history repeating itself especially in relation to the M5 Tunnel where now allegedly large clusters of lung cancer victims are being noted thus have attached the Lane Cove Tunnel submission by Dr. Ray Kearney which perhaps mirrors the status quo now in relation to the WestConnex project, un filtered emission portals and the new toll ways - Toll Ways are for the wealthy not the working poor in NSW - and we should not forget that the working poor voter numbers far outstrip the wealthy voting numbers. the WestConnex also uses an 'air monitoring station in Rozelle' that does not comply with Australian Standards AS/NZS 3580.1.1:2007 - Methods for sampling and analysis

of ambient air - Guide to siting air monitoring equipmentas the clear sky angle is < 120O due to trees within 20 metres to the west of the monitoring site.
Australian Map Grid (AMG) coordinates* (km): 6251.2 northing, 330.0 easting and zone 56

Attached are documents referred to in the submission which relate to the dismissal of the dangers of asbestos contamination by the same parties back in 2003 and now in relation to the WestConnex project..by ignoring community concerns and evidence...by suggesting that
" SWNSW can confirm that the removal of all ACM as part of the WestConnex Project has been undertaken by a competent removalist who has demonstrated the qualifications, experience and skill to undertake this task.

But SafeWork NSW neglects to provide their own independent figures and evidence, to confirm their comments above they must provide the community with their own factual evidence that they undertook their own investigation and have the evidence that a bona fide laboratory tested the samples that SafeWork NSW would have had to provide for testing in order to ensure that their comments/statement could not be compromised...sic independent report...please SafeWork NSW.

[redacted]
Submission: Online Submission from Josephine Wadlow-Evans of www.foxandchickens.org (object)
https://majorprojects.accelo.com/?action=view_activity&id=228125

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

JOHN SOUTHMAN & ASSOCIATES PTY LTD T/A
AIRSAFE
OCCUPATIONAL HEALTH CONSULTANTS A.B.N. 33 092 252 676

93 Beattie Street, Balmain NSW 2041 Tel: (02) 9555 9034 Fax: (02) 9555 9403

September 20, 2002

Mr Bill Snell
Alkene
17 Norman St,
Peakhurst NSW 2210
Ph: 95472391 Fax: 95472348

INSPECTION REPORT : FOX STUDIOS, MOORE PARK
BUILDING 36

In response to a request from Alkene, Airsafe conducted a visual inspection at the above site following the removal of asbestos materials.

The scope of work required Alkene to remove;

- Asbestos cement roof sheets from the eastern half of Building 36.
- Asbestos cement downpipes surrounding the building..

A detailed inspection of the above area, following removal procedures, revealed that the asbestos containing materials specified had been removed to a satisfactory industry standard.

Important Note : This inspection report covers the areas stated above. Airsafe takes no responsibility for any asbestos or other contamination found within the soil, the sub surface or other areas of the property not stated above.

Inspected and reported by;

Sharon Vinton B.Sc(Env. Bio)
Airsafe Occupational Health Consultants

JOHN BOUWMAN & ASSOCIATES PTY LTD T/As
AIRSAFE
OCCUPATIONAL HEALTH CONSULTANTS A.B.N. 33 092 252 876

93 Beattie Street, Balmain NSW 2041 Tel: (02) 9555 9034 Fax: (02) 9555 90

September 13, 2002

Mr Bill Snell
Alkene
17 Norman St,
Peakhurst NSW 2210
Ph: 95472391 Fax: 95472348

INSPECTION REPORT : FOX STUDIOS, MOORE PARK
BUILDING 36

In response to a request from Alkene, Airsafe conducted a visual inspection at the above site following the removal of asbestos materials.

The scope of work required Alkene to remove:

- Asbestos cement roof sheets from the western half of Building 36.

A detailed inspection of the above area, following removal procedures, revealed that the asbestos containing materials specified had been removed to a satisfactory industry standard.

Please note: Asbestos cement downpipes remain in situ. Removal of asbestos cement sheets has commenced on the eastern half of Building 36.

Important Note : This Inspection report covers the areas stated above. Airsafe takes no responsibility for any asbestos or other contamination found within the soil, the sub surface or other areas of the property not stated above.

Inspected and reported by:

Sharon Vinton B.Sc(Env. Bio)
Airsafe Occupational Health Consultants

JOHN BOUWMAN & ASSOCIATES PTY LTD T/As
AIRSAFE
OCCUPATIONAL HEALTH CONSULTANTS A.B.N 33 092 252 876

93 Beattie Street, Balmain NSW 2041 Tel: (02) 9555 9034 Fax: (02) 9555 9035

RESULTS OF BACKGROUND AIR MONITORING FOR AIRBORNE ASBESTOS DUST AT;

FOX STUDIOS, MOORE PARK
BUILDING 36

Date: September 9, 2002

Client: Alkane

Job No: 05778

Method: Filters examined in accordance with the 1988 NOHSC Guidance Note on the Membrane Filter Method and Airsafe Laboratories Procedure 101.

SLIDE No	LOCATION	TIME ON	TIME OFF	FIELDS	CONCENTRATION FIBRES	CONCENTRATION FIBRES/ML
05778/1	Western boundary fence	0850	1258	100	0	<0.01
05778/2	Boundary fence - south west corner	0851	1259	100	0	<0.01
05778/3	Slouthern boundary fence	0852	1300	100	0	<0.01
05778/4	Lunch room	0855	1302	100	0	<0.01

ork in Progress: Air monitoring during the removal of asbestos cement sheets from the western roof section

Note: These results relate only to the sample tested

Comment: These readings are less than 0.01 fibres/ml which is below the detection limit, for para-occupational sampling, of the Worksafe Australia Membrane Filter Method.

Counter: John Bouwman

John Bouwman
Managing Director

JOHN BOUWMAN & ASSOCIATES PTY LTD
AIRSAFE
OCCUPATIONAL HEALTH CONSULTANTS A.B.N. 33 092 252 676

93 Beattie Street, Balmain NSW 2041 Tel: (02) 9555 9034 Fax: (02) 9555 903

RESULTS OF BACKGROUND AIR MONITORING FOR AIRBORNE ASBESTOS DUST AT:

FOX STUDIOS, MOORE PARK
BUILDING 36

Date: September 10, 2002

Client: Alkene

Job No: 05778

Method: Filters examined in accordance with the 1988 NOHSC Guidance Note on the Membrane Filter Method and Airsafe Laboratories Procedure 101.

SLIDE No	LOCATION	TIME ON	TIME OFF	FIELDS	CONCENTRATION FIBRES	CONCENTRATION FIBRES/ML
05778/5	Western boundary fence	0706	1458	100	0	<0.01
05778/6	Boundary fence - south west corner	0707	1459	100	0	<0.01
05778/7	Southern boundary fence	0708	1500	100	0	<0.01
05778/8	Lunch room	0711	1501	100	0	<0.01

Work in Progress: Air monitoring during the removal of asbestos cement sheets from the western roof section.

Note: These results relate only to the sample tested.

Comment: These readings are less than 0.01 fibres/ml which is below the detection limit, for para-occupational sampling, of the Worksafe Australia Membrane Filter Method.

Counter: John Bouwman

K.N. [signature]
for.
John Bouwman
Managing Director

JOHN BOUWMAN & ASSOCIATES PTY LTD T/As
AIRSAFE
OCCUPATIONAL HEALTH CONSULTANTS A.B.N. 33 092 252 870

93 Beattie Street, Balmain NSW 2041 Tel: (02) 9555 9034 Fax. (02) 9555 9035

RESULTS OF BACKGROUND AIR MONITORING FOR AIRBORNE ASBESTOS DUST AT;

FOX STUDIOS, MOORE PARK
BUILDING 36

Date: September 11, 2002

Client: Alkene

Job No: 05778

Method: Filters examined in accordance with the 1988 NOHSC Guidance Note on the Membrane Filter Method and Airsafe Laboratories Procedure 101.

SLIDE No	LOCATION	TIME ON	TIME OFF	FIELDS	CONCENTRATION FIBRES	CONCENTRATION FIBRES/ML
05778/9	Western boundary fence	0703	1452	100	0	<0.01
05778/10	Boundary fence - south west corner	0704	1453	100	0	<0.01
05778/11	Southern boundary fence	0705	1454	100	0	<0.01
05778/12	Lunch room	0707	1456	100	0	<0.01

Work in Progress: Air monitoring during the removal of asbestos cement sheets from the western roof section.

Note: These results relate only to the sample tested.

Comment: These readings are less than 0.01 fibres/ml which is below the detection limit, for para-occupational sampling, of the Worksafe Australia Membrane Filter Method.

Counter: John Bouwman

John Bouwman
Managing Director

12-SEP-2002 17:55 FROM AIRSAFE TO ALKENE P.01/01

JOHN BOUWMAN & ASSOCIATES PTY LTD T/As
AIRSAFE
OCCUPATIONAL HEALTH CONSULTANTS A.B.N. 33 092 252 873

93 Beattie Street, Balmain NSW 2041 Tel: (02) 9555 9034 Fax: (02) 9555 9036

RESULTS OF BACKGROUND AIR MONITORING FOR AIRBORNE ASBESTOS DUST AT;

FOX STUDIOS, MOORE PARK
BUILDING 36

Date: September 12, 2002

Client: Alkone

Job No: 05778

Method: Filters examined in accordance with the 1988 NOHSC Guidance Note on the Membrane Filter Method and Airsafe Laboratories Procedure 101.

SLIDE No	LOCATION	TIME ON	TIME OFF	FIELDS	CONCENTRATION FIBRES	CONCENTRATION FIBRES/ML
05778/13	Boundary fence - south west corner	0711	1453	100	0	<0.01
05778/14	Southern boundary fence - west	0712	1454	100	0	<0.01
05778/15	Southern boundry fence - east	0713	1455	100	0	<0.01
05778/16	Lunch room	0714	1456	100	0	<0.01

Work in Progress: Air monitoring during the removal of asbestos cement sheets from the western roof section.

Note: These results relate only to the sample tested.

Comment: These readings are less than 0.01 fibres/ml which is below the detection limit, for para-occupational sampling, of the Worksafe Australia Membrane Filter Method.

Counter: John Bouwman

John Bouwman
Managing Director

JOHN BOUWMAN & ASSOCIATES PTY LTD T/As
AIRSAFE
OCCUPATIONAL HEALTH CONSULTANTS A.B.N. 33 052 252 876

93 Beattie Street, Balmain NSW 2041 Tel: (02) 9555 9034 Fax: (02) 9555 903

RESULTS OF BACKGROUND AIR MONITORING FOR AIRBORNE ASBESTOS DUST AT;

FOX STUDIOS, MOORE PARK
BUILDING 36

Date: September 13, 2002

Client: Alkene

Job No: 05778

Method: Filters examined in accordance with the 1988 NOHSC Guidance Note on the Membrane Filter Method and Airsafe Laboratories Procedure 101.

SLIDE No	LOCATION	TIME ON	TIME OFF	FIELDS	CONCENTRATION FIBRES	CONCENTRATION FIBRES/ML
05778/17	Boundary fence - south west corner	0704	1428	100	0	<0.01
05778/18	Southern boundary fence - west	0705	1429	100	0	<0.01
05778/19	Southern boundry fence - east	0706	1430	100	0	<0.01
05778/20	Lunch room	0707	1432	100	0	<0.01

Work in Progress: Air monitoring during the removal of asbestos cement sheets from the eastern roof section.

Note: These results relate only to the sample tested.

Comment: These readings are less than 0.01 fibres/ml which is below the detection limit, for para-occupational sampling, of the Worksafe Australia Membrane Filter Method.

Counter: John Bouwman

John Bouwman
Managing Director

13-SEP-2002 15:36 FROM AIRSAFE TO ALKENE P.02/6

JOHN BOUWMAN & ASSOCIATES PTY LTD T/A
AIRSAFE
OCCUPATIONAL HEALTH CONSULTANTS A.B.N. 33 092 257 876

93 Beattie Street, Balmain NSW 2041 Tel: (02) 9555 9034 Fax: (02) 9555 9

RESULTS OF BACKGROUND AIR MONITORING FOR AIRBORNE ASBESTOS DUST AT;

FOX STUDIOS, MOORE PARK
BUILDING 36

Date: September 13, 2002

Client: Alkene

Job No: 05778

Method: Filters examined in accordance with the 1988 NOHSC Guidance Note on the Membrane Filter Method and Airsafe Laboratories Procedure 101.

SLIDE No	LOCATION	TIME ON	TIME OFF	FIELDS	CONCENTRATION FIBRES	CONCENTRATION FIBRES/ML
05778/17	Boundary fence - south west corner	0704	1428	100	0	<0.01
05778/18	Southern boundary fence - west	0705	1429	100	0	<0.01
05778/19	Southern boundry fence - east	0706	1430	100	0	<0.01
05778/20	Lunch room	0707	1432	100	0	<0.01

Work in Progress: Air monitoring during the removal of asbestos cement sheets from the eastern roof section.

Note: These results relate only to the sample tested.

Comment: These readings are less than 0.01 libres/ml which is below the detection limit, for para-occupational sampling, of the Worksafe Australia Membrane Filter Method.

Counter: John Bouwman

John Bouwman
Managing Director

JOHN BOUWMAN & ASSOCIATES PTY LTD T/AS
AIRSAFE
OCCUPATIONAL HEALTH CONSULTANTS A.B.N. 33 092 252 876

93 Beattie Street, Balmain NSW 2041 Tel: (02) 9555 9034 Fax: (02) 9555 9035

RESULTS OF BACKGROUND AIR MONITORING FOR AIRBORNE ASBESTOS DUST AT;

FOX STUDIOS, MOORE PARK
BUILDING 36

Date: September 16, 2002

Client: Alkene

Job No: 05778 ,

Method: Filters examined in accordance with the 1988 NOHSC Guidance Note on the Membrane Filter Method and Airsafe Laboratories Procedure 101.

SLIDE No	LOCATION	TIME ON	TIME OFF	FIELDS	CONCENTRATION FIBRES	CONCENTRATION FIBRES/ML
05778/21	Boundary fence - south west corner	0701	1345	100	0	<0.01
05778/22	Southern boundary fence - west	0702	1346	100	0	<0.01
05778/23	Southern boundry fence - east	0703	1347	100	0	<0.01
05778/24	Lunch room	0705	1349	100	0	<0.01

Work In Progress: Background air monitoring.

Note: These results relate only to the sample tested

Comment: These readings are less than 0.01 fibres/ml which is below the detection limit, for para-occupational sampling, of the Worksafe Australia Membrane Filter Method.

Counter: John Bouwman

John Bouwman
Managing Director

JOHN BOUWMAN & ASSOCIATES PTY LTD T/As
AIRSAFE
OCCUPATIONAL HEALTH CONSULTANTS A.B.N. 33 002 252 876
93 Beattie Street, Balmain NSW 2041 Tel: (02) 9555 9034 Fax: (02) 9555 9035

RESULTS OF BACKGROUND AIR MONITORING FOR AIRBORNE ASBESTOS DUST AT;

FOX STUDIOS, MOORE PARK
BUILDING 36

Date: September 18, 2002

Client: Alkene

Job No: 05778

Method: Filters examined in accordance with the 1988 NOHSC Guidance Note on the Membrane Filter Method and Airsafe Laboratories Procedure 101.

SLIDE No	LOCATION	TIME ON	TIME OFF	FIELDS	CONCENTRATION FIBRES	CONCENTRATION FIBRES/ML
05778/25	Boundary fence - south west corner	0710	1422	100	0	<0.01
05778/26	Southern boundary fence - west	0711	1423	100	0	<0.01
05778/27	Southern boundary fence - east	0712	1424	100	0	<0.01

Work in Progress: Air monitoring during the removal of asbestos cement roof sheets from the eastern half of Bld 36

Note: These results relate only to the sample tested.

Comment: These readings are less than 0.01 fibres/ml which is below the detection limit, for para-occupational sampling, of the Worksafe Australia Membrane Filter Method.

Counter: John Bouwman

John Bouwman
Managing Director

20-SEP-2002 19:43 FROM AIRSAFE TO ALKENE P.01/01

JOHN BOUWMAN & ASSOCIATES PTY LTD ACN
AIRSAFE
OCCUPATIONAL HEALTH CONSULTANTS A.B.N. 33 002 252 878

93 Beattie Street, Balmain NSW 2041 Tel: (02) 9555 9034 Fax: (02) 9555 9035

RESULTS OF BACKGROUND AIR MONITORING FOR AIRBORNE ASBESTOS DUST AT;

FOX STUDIOS, MOORE PARK
BUILDING 36

Date: September 19, 2002

Client: Alkene

Job No: 05778

Method: Filters examined in accordance with the 1988 NOHSC Guidance Note on the Membrane Filter Method and Airsafe Laboratories Procedure 101.

Slide No	Location	Time		Fields	Concentration	
		On	Off		Fibres	Fibres/mL
05778/28	Boundary fence – south west corner	0727	1515	100	0	<0.01
05778/29	Southern boundary fence –west	0729	1516	100	0	<0.01
05778/30	Southern boundary fence - east	0728	1517	100	0	<0.01
05778/31	Lunch room	0731	1518	100	0	<0.01

Work in Progress: Air monitoring during the removal of asbestos cement sheets from the east half of Bld 36

Note: These results relate only to the sample tested.

Comment: These readings are less than 0.01 fibres/mL, which is below the detection limit for para-occupational sampling, of the Worksafe Australia Membrane Filter Method.

Counter: John Bouwman

for
JOHN BOUWMAN
Managing Director

JOHN BOUWMAN & ASSOCIATES PTY LTD T/AS
AIRSAFE
OCCUPATIONAL HEALTH CONSULTANTS A.B.N. 33 092 252 874
93 Beattie Street, Balmain NSW 2041 Tel: (02) 9555 9034 Fax: (02) 955

RESULTS OF BACKGROUND AIR MONITORING FOR AIRBORNE ASBESTOS DUST AT;

FOX STUDIOS, MOORE PARK
BUILDING 36

Date: September 20, 2002

Client: Alkene

Job No: 05778

Method: Filters examined in accordance with the 1988 NOHSC Guidance Note on the Membrane Filter Method and Airsafe Laboratories Procedure 101.

Slide No	Location	Time On	Time Off	Fields	Concentration Fibres	Concentration Fibres/mL
05778/32	Boundary fence – south west corner	0720	1415	100	0	<0.01
05778/33	Southern boundary fence –west	0721	1416	100	0	<0.01
05778/34	Southern boundary fence - east	0722	1417	100	0	<0.01
05778/35	Lunch room	0723	1418	100	0	<0.01

Work In Progress: Air monitoring during the removal of asbestos cement sheets from the east half of Bld 36.

Note: These results relate only to the sample tested.

Comment: These readings are less than 0.01 fibres/mL, which is below the detection limit for para - occupational sampling, of the Worksafe Australia Membrane Filter Method.

Counter: John Bouwman

JOHN BOUWMAN
Managing Director

12/9

M.J.
for file (Craftsman DA)
Dan

FSA #07 Driver Avenue
Moore Park NSW 1363 Australia
Phone (612) 9383 4000 Fax (612) 9383 4007

FOX STUDIOS AUSTRALIA
FACSIMILE

Attention:	Dan Keary	Fax Number:	9762 8703
Company:	Planning NSW	Date:	4 Sep 02
From:	Rod Allan	No of Pages:	16
Copy:			
Subject:			

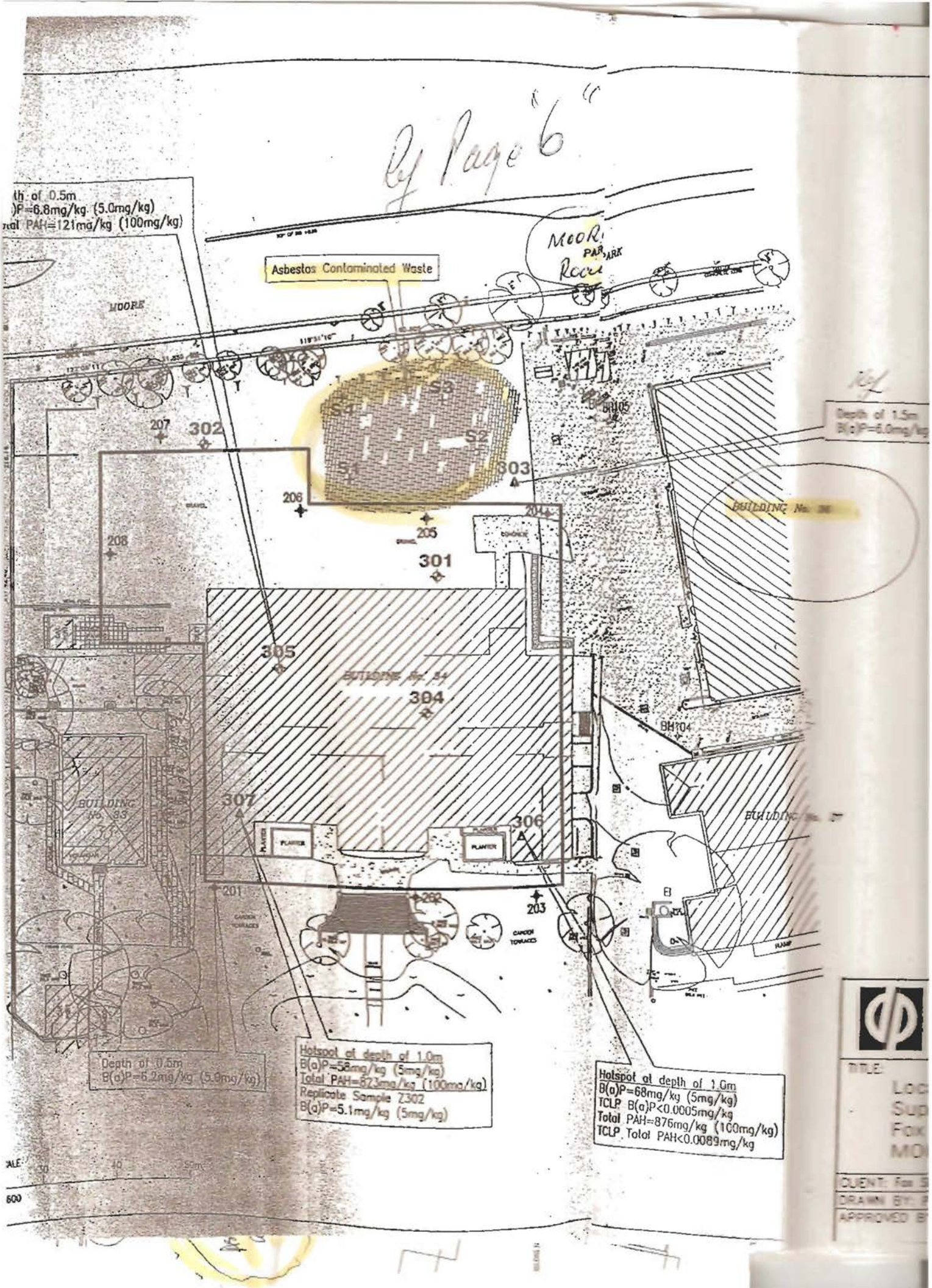
Dear Dan,

Please see attached.

Rod Allan

This document and any following pages are intended solely for the named addressee, are confidential and may contain legally privileged information. The copying or distribution of them or any information they contain, by anyone other than the addressee, is prohibited. If you have received this document in error, please let us know by telephone, and then return it by mail to the address above. We shall refund the costs of doing so.

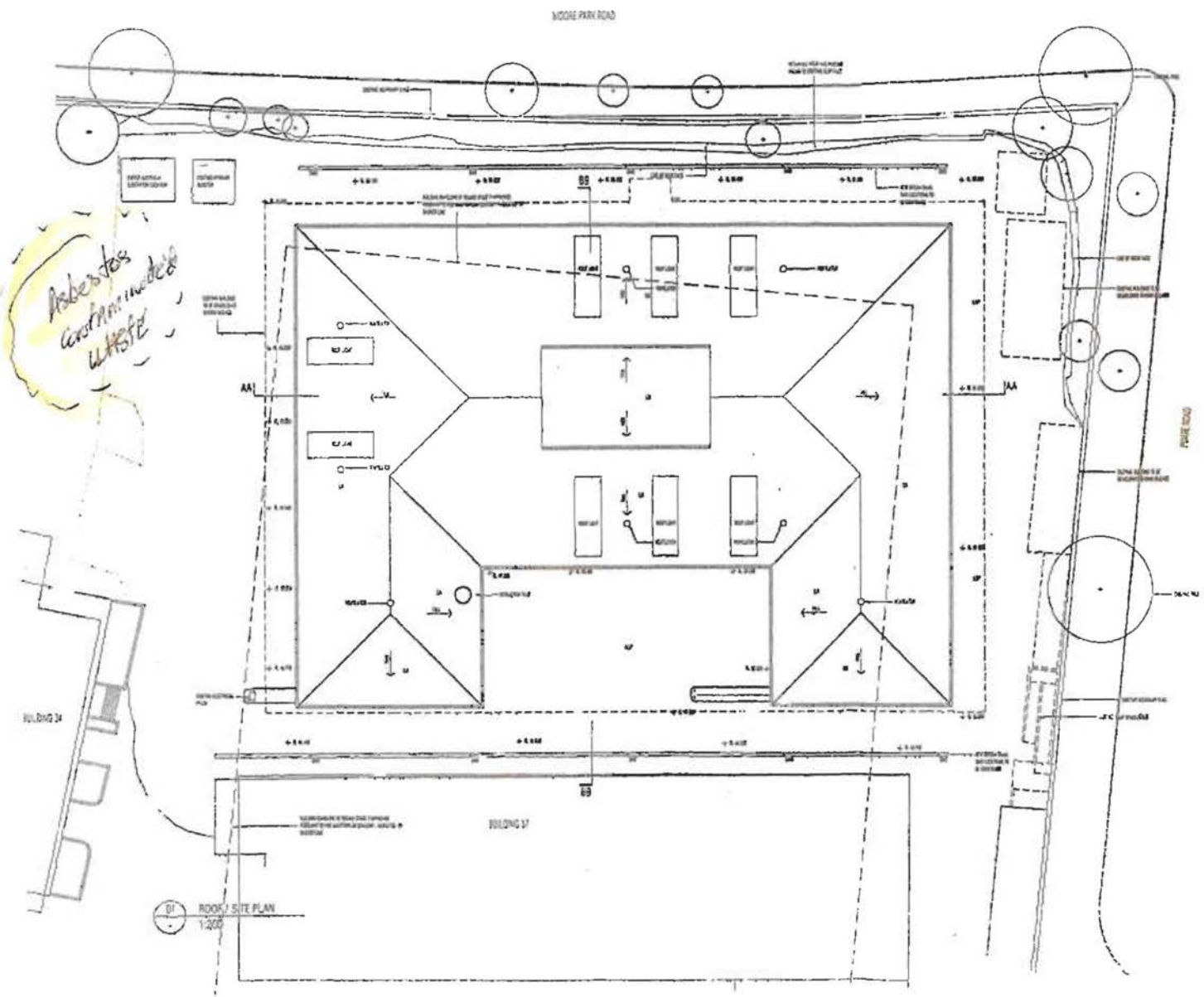
Fox Studios Australia Pty Ltd ACN 081 056 653 Fox Australia Pty Ltd ABN 50 003 405 570
Fox Production Services Australia Pty Ltd ABN 17 079 907 627 Fox Moore Park Pty Ltd ABN 42 004 261 670
Fox World Australia Pty Ltd ACN 089 888 435



Ref Page "6"
th of 0.5m
)P=6.8mg/kg (5.0mg/kg)
al PAH=121mg/kg (100mg/kg)
Asbestos Contaminated Waste
MOORE
S1
S2
S3
S4
207
302
303
206
205
204
208
301
305
BUILDING No. 34
304
BUILDING No. 33
307
306
201
202
203
BH105
BH104
Depth of 1.5m
B(a)P=6.0mg/kg
Depth of 0.5m
B(a)P=6.2mg/kg (5.0mg/kg)
Hotspot at depth of 1.0m
B(a)P=58mg/kg (5mg/kg)
Total PAH=823mg/kg (100mg/kg)
Replicate Sample Z302
B(a)P=5.1mg/kg (5mg/kg)
Hotspot at depth of 1.0m
B(a)P=68mg/kg (5mg/kg)
TCLP B(a)P<0.0005mg/kg
Total PAH=876mg/kg (100mg/kg)
TCLP Total PAH<0.0089mg/kg
TITLE:
CLIENT: Fox S
DRAWN BY:
APPROVED B



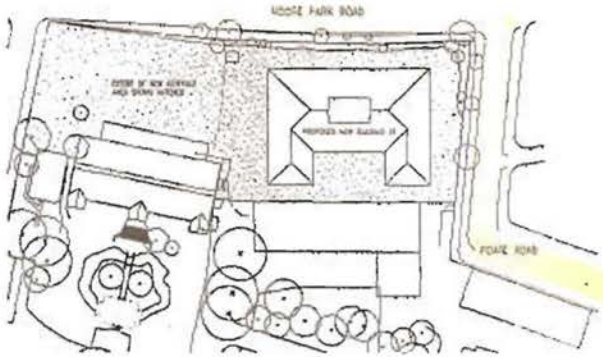
project FOX STUDIOS AUSTRALIA - NEW BUILDING 36 - CRAFT SHOP | title ROOF / SITE PLAN | DATE 7008-CR-DA-01/A | June 2002 | 1:200@A1



01 ROOF / SITE PLAN
1:200

LEGEND

ASP	ASPHALT
FC-1	REMOVABLE PAINTED FC SHEET Note: Allow for aluminium framed window frame
FC-2	PAINTED FC SHEET
B	ALUMINIUM FRAME SLIDING GLASS WINDOWS - PC FINISH
EV	ALUMINIUM FRAMED WATERPROOF LOUVRES - PC FINISH
PC	SELECT PRECAST CONCRETE PANELS
AS	PRE-FINISHED METAL ROLLER SHUTTER
SA	PREFINISHED METAL ROOFING WITH DEAD GUTTERS, DOWNPIPES, RIDGE & BARGE CAPPINGS



02 SITE PLAN
1:1000

WestConnex Submission…… 16th October, 2017

The WestConnex project…

The dark Shadowy project controlled by bureaucrats, corporations, Ministers and their corporate advisors…the victims the general public and taxpayers…

http://www.abc.net.au/news/2017-02-08/billions-wasted-on-infrastructure-projects-from-bad-planning/8251836 - But a global report released today said billions of dollars are wasted on infrastructure projects because of bad planning, ***bureaucracy*** and the failure to retain good staff.

Australia wastes $108 million for every $1 billion it spends on infrastructure and whose money is it anyway?
When EPA figures do not add up – this project is a mirror of Labor back in 2003 and the M5 debacle… where WestConnex CEO uses figures from M5 Tunnel emissions to decide why no tunnel filtration in Rozelle…'clusters of lung cancer' victims adjacent to M5 Tunnel emission stacks…

Misfeasance in Public Office…… https://en.wikipedia.org/wiki/Anthony_Roberts

When a new Political party comes in there is one glaring problem - the status quo does not change - the same 'bureaucrats' are in power - and many of those have vested interests in the very industry that they are charged and paid for handsomely by the hapless taxpayer to 'regulate' -

In politics, the "revolving door" is a movement of personnel between roles as legislators and regulators and the industries affected by the legislation and regulation.

In some cases, the roles are performed in sequence but in certain circumstances may be performed at the same time. Political analysts claim that an unhealthy relationship can develop between the private sector and government, based on the granting of reciprocated privileges to the detriment of the nation and can lead to regulatory capture...

How Ministers are hand managed by the same old, same old bureaucrats and their systems…and their equally vested interests:

http://ags.gov.au/publications/legal-briefing/br98.html - and also abuse of power in public office … http://www.austlii.edu.au/au/journals/AIAdminLawF/2010/29.pdf -

The abuse of the position of power by a Commonwealth Public Official or indeed a State Public Official is a criminal offence under **Section 142.2** of the Schedule to the ***Criminal Code Act 1995***. ***– All Australian Public Servants who abuse the power of their public office should be put in the spotlight so that the Australian Federal Police and the***

Commonwealth Director of Public Prosecutions can no longer turn a blind eye to serious abuses of power by Australian Public Servants

Tort of Misfeasance in Public Office can be applied to the WestConnex project allegedly in its entirety.

. http://ags.gov.au/publications/legal-briefing/br98.html -

(This could be used to help compensate all of those victims who had their homes and businesses deliberately 'undervalued' by the NSW LNP Government during the enforced sale of their properties/businesses../and for the ongoing health problems associated with the WestConnex project)…and whose homes/businesses have been seriously damaged as a result of construction works being undertaken by all parties involved in the construction of the WestConnex project and ancilliary projects.

The Commonwealth Director of Public Prosecutions can provide Victim Impact Statements to the court in cases where Public Servants have abused their official power to the detriment to the Public. The detriment does not need to be solely a financial detriment.

… …

WestConnex project …how arm's length probity is being ignored, groomed and abused and how alleged flawed 'air emission data ' being attributed to an EPA monitoring station in Rozelle, using , it is alleged, a Channel Seven meteorologist David Brown, to inform the public that 'the air monitoring station ' in Rozelle showed no 'toxic emissions' – but fail to inform both Channel 7 and the meteorologist that the ' air emission station ' does not comply with:

Australian Standard AS/NZS 3580.1.1:2007 - Methods for sampling and analysis of ambient air - Guide to siting air monitoring equipmentas the clear sky angle is < 120O due to trees within 20 metres to the west of the monitoring site.
Australian Map Grid (AMG) coordinates* (km): 6251.2 northing, 330.0 easting and zone 56

http://kats15blog.blogspot.com.au/2006/08/in-tunnel-filtration-necessity-by-kate.html - At the General Purpose Standing Committee No 5 in the Inquiry into the M5 East Ventilation Stack in 2001 Paul Forward, Chief Executive of the RTA, ***said that in-tunnel filtration is not necessary. –*** now we have Paul Forward heading PAC the alleged independent body giving the vote of approval for all contentious developments such as the WestConnex project without in tunnel filtration…

PAC - **Paul Forward** has over 40 years of senior level experience in both the private and public sectors, including the Tertiary Sector with specific experience in transport, water industries and land use planning. He is a qualified economist and town planner, with postgraduate qualifications in both disciplines, with a Master of Commerce (Economics from UNSW) and a Master of Science (Planning from the University of London). He commenced his career as a Lecturer in Economics at UNSW, was Chief Executive of the Roads and Traffic Authority for six years, and was a Principal at Evans and Peck from 2006 to 2013. He has held various other positions including Chair of AUSTROADS, Chair of AgriBio (the Bio Science Research Centre based at La Trobe University) and Executive Director at Sydney Water. He is a graduate and member of the Australian Institute of Company Directors. He has been a member of the Planning Assessment Commission since 2012. (How fortuitous a person that does not believe in In - Tunnel filtration on the alleged independent oversight body – but a report by the Auditor-General suggests that there are many anomalies attached to this so-called independent body:

http://www.audit.nsw.gov.au/news/assessing-major-development-applications-planning-assessment-commission

Most importantly, the Commission was not able to show in every decision we reviewed how it met its statutory obligation to consider the likely environmental, social and economic impacts of a development as required under the *Environmental Planning and Assessment Act 1979*.

Despite improved probity measures put in place by the Commission, there is a perception among some stakeholders that it is not independent of the Department of Planning and Environment (the Department).

More can also be done to improve transparency in decision-making and the public's perception of the independence of Commissioners -

……

Australia wastes $108 million for every $1 billion it spends on infrastructure. Taxpayer's money.

Dr Peter Manins, CSIRO Deputy Chief of Air Science, agrees that Sydney's tunnels are a hazard to health of motorists and residents.

"The concerns for motorists are excessive levels of particles, in combination with elevated levels of nitrogen dioxide and air toxins bound to the particles.

"*The biggest risk is to be stuck in traffic in the tunnel*" he said, pointing out that this is a daily reality for many motorists.

……

Statutory breach of a duty of care within the public or indeed statutory negligence or negligence per se - which of course is retrospective….

That the EPA, SMC, RMS and The Department of Planning NSW allegedly are knowingly and deliberately making misleading statements which in turn is exposing thousands within the public at risk from 'contamination'…. And how the EPA and SafeWork NSW are allegedly knowingly compromised by coming under the management of a Minister…highlighting the fact that there can/is no independent and reliable evidence/data presented in relation to the WestConnex project….but the real power behind, it is alleged, the throne are the powerful and uncompromising bureaucrats – slipped into power by the ever revolving door of politics…and corporate Australia…

How worldwide and especially in NSW the EPA continue to work for Governments with vested interests to cover up the truth - rather than protecting the welfare, health and safety of the people and their communities - knowingly exposing tens of thousands of victims to the deadly impact of noxious chemicals including asbestos….

Below is a torrid example of what deliberately ignoring as a regulatory authority their legal 'duty of care' – the 9/11 cover-up by the US EPA…leaves thousands of innocent victims who actually believed they were being taken care of by the 'powers that be' – in fact, as in the case of the WestConnex Project they are effectively being thrown to the wolves…

https://www.theguardian.com/us-news/2016/sep/10/epa-head-wrong-911-air-safe-new-york-christine-todd-whitman

Christine Todd Whitman, who as head of the Environmental Protection Agency (EPA) under George W Bush at the time of the 9/11 attacks told the public the air around Ground Zero in New York was safe to breathe, has admitted for the first time she was wrong.

In 2003, the EPA inspector general criticized the agency's handling of the crisis, finding that the EPA had no basis for its swift pronouncements about air quality. Politicians, including the then New York senator Hillary Clinton, laid into the Bush administration, accusing it of deceiving the public.

Days after terrorists brought down the World Trade Center towers, the Environmental Protection Agency (EPA) announced that the air was safe to breathe, but that proved to be a dangerously optimistic assessment. Nearly two years later, EPA's Office of the Inspector General (OIG) reported that the EPA "did not have sufficient data and

analyses to make such a blanket statement," as "air monitoring data was lacking for several pollutants of concern." The OIG also discovered that the White House Council on Environmental Quality (CEQ) significantly revised EPA press releases "to add reassuring statements and delete cautionary ones." Samples showed asbestos levels between double and triple EPA's danger limit, but CEQ edits defined the results as "slightly above" the limit.

EPA was instructed to clear all statements to the media through the National Security Council, giving National Security Advisor Condoleezza Rice's office final approval. While the EPA pointed to its recommendations that workers and volunteers on site take precautions such as using respirators, OIG said "EPA's basic overriding message was that the public did not need to be concerned about airborne contaminants."

……..

Above is the dramatisation of 9/11 – in its brutal entirety – that the EPA and other regulatory authorities lied at will and on instructions from their over-riding peers – and in doing so has left thousands of dead and dying victims – who believed what they were being led to believe…that the air they breathed was safe…

Sydney/Leichhardt NSW, Australia.

The CEO of SMC, his partners, the NSW RMC and their senior management consistently lie and knowingly deliberately mislead the general public – in relation to the WestConnex project…and its endangerment to the broader community from potential and factual exposure of toxic dust emissions much of which has been photographically documented and more likely than not contained 'asbestos'…

http://hallandwilcox.com.au/legal-obligations-of-directors-of-australian-companies/

Occupational health and safety laws – or what is being ignored relative to all aspects of the WestConnex project.

Or how this LNP Government and the CEO of Sydney Motorway Corporation its, partners and contractors tailor EIS's to ensure little or no liability for future corporate takeovers…

Equally the cover-up of the cluster of 'lung cancer victims' adjacent to the M5 Tunnel continue to evade the alleged compliant Media – but perhaps not for long…

Each Australian State and Territory has occupational health and safety (OHS) legislation which imposes certain obligations on companies with employees. It is typically required that all companies with employees ensure the health, safety and welfare at work of their employees, contractors and other persons. Breaches of the relevant OHS Act attract large fines.

In some States, where a company violates one of the OHS Acts, directors will be deemed to also be in breach of the OHS Acts, unless they are able to satisfy a court that the

director could not influence relevant conduct of the company or the director used all due diligence to prevent the contravention by the company.

Environmental protection laws

All Australian States and Territories have enacted environmental protection legislation. Serious offences, like the disposal of waste without lawful authority, causing leakage or spillage of a harmful substance and emission of ozone depleting substances can carry penalties of in excess of $1 million for a company.

Where an offence is proved against a company, the directors of the company risk being held liable for the ancillary offence of aiding, abetting, attempting or conspiring to commit such an offence (which carries a maximum penalty of $290,000 and/or 7 years imprisonment).

Leichhardt and adjoining suburbs – Flight Path – inbound and outbound aircraft traffic zones…

Leichhardt and other adjoining suburbs lie directly under the 'flight path' and as such expose thousands to unsolicited and unfiltered 'aviation fuel' both in-bound and externally by out-bound aircraft traffic – this the EPA and those with vested interests refuse to include in the EIS – equally so it has become evident that there has been a rapid increase of both inbound and outbound aircraft traffic accessing the Inner West 'flight path corridor' – again heavily impacting on the 'air emission contaminants' disturbances – in other words the communities directly under the flight path are not just being impacted by the proposed Darling Street dive site and the increase in 'diesel loaded vehicles' (Australian diesel fuel is noted as being the most contaminated in the Western World) but also the increased 'flight path load'…which breaches the Ozone Act., and impacts especially during the night time with greater 'air emission contamination' of the local communities…

These readings have not been included within the EIS relating specifically to this particular Darley Road dive project – and as such the EIS must be deemed and taken as legally 'flawed' especially as it has been noted that the Department of Planning NSW and its partners have been using ' air testing readings ' from an EPA ' air monitoring station ' that does not comply with Australian Standards AS/NZS 3580.1.1:2007 - Methods for sampling and analysis of ambient air - Guide to siting air monitoring equipment as the clear sky angle is < 120O due to trees within 20 metres to the west of the monitoring site.

Australian Map Grid (AMG) coordinates* (km): 6251.2 northing, 330.0 easting and zone 56

http://www.rcep.org.uk/reports/index.htm - this was an independent body that advised the UK Government – its modus operandi is much the same as the CSB Board that has oversight of the US EPA…

There appears to be no such independent body in Australia – that is with the willingness to have oversight over the statutory/regulatory authorities in Australia - that are more likely than not required to operate within the guidelines of all levels of Government rather than in the vested interest of the General Public at large, or their welfare, health and safety – the present day corruption in the Murray Darling Basin project and the Waste Industry and its relationship with the NSW EPA – perhaps this presents the public with a better insight/view as to how their taxpayer dollars are 'not' spent wisely…

What must be noted here is that at this present moment in time the EPA is under investigation by the ICAC as they handed themselves in after the Four Corners Waste programme….

https://www.icao.int/environmental-protection/Pages/local-air-quality.aspx - neither the CEO of SMC and or the Chief Executive of RMC appear to remind themselves that Australia are a signatory of CAEP – especially when it relates to Air Quality within not just Airports but also the 'aircraft flight path' usages… such as Leichhardt and adjoining suburbs – these figures have not ever been included in any of the EIS's each time that the parties present yet another plan for public comment…

Aircraft contamination – cummulative affect of 'unfiltered emission stacks' under aircraft flight path….

The contaminants emitted by aircraft and airport sources can affect human health and the environment. ICAO is working on initiatives to improve local air quality, as well as proposing mitigation measures.

https://www.icao.int/environmental-protection/Pages/noise.aspx

https://www.icao.int/environmental-protection/Pages/ClimateChange_ActionPlan.aspx -

What is important to note here is that Australia is a member State – however, the Premier of NSW and her colleagues, and bureaucrats clearly in relation to their vested interest in the WestConnex project throw all of their signed and legal responsibilities out of the window in order to ensure that this project can continue to impact adversely on all local communities irrespective of whether such impacts either cause major and catastrophic health problems and or death in the future…never once applying 'the obligatory 'precautionary principle''…(by continually refusing to include 'aircraft contamination' to be included in all EIS relating to the WestConnex project, thus producing flawed EIS's) and taking the readings from a non compliant 'air testing station' and suggesting that the EIS as presented by the State owned Chief Scientist, shows no reason to have in-tunnel filtration…as Rozelle according to Channel 7 together with the EPA Officers, was and is the only area in NSW presenting with Clean Air….the reason being that it is only monitoring CLEAN AIR…

They view, cynically, the deadly impact on the community as an acceptable but sad, so to speak, fact of 'collateral damage'…already factored into the Development as being the 10% receptors known to be affected…

What must not be forgotten is that the Australian Federal Government handed over large sums of taxpayer's money to finance this project – and therefore will also carry liability for any and all future claims in relation to the fact that no party involved within the development operated with a 'duty of care' which again can point to a 'misfeasance in public office' equally so the SafeWork Australia will and could be seen as wanting in that they handed over the responsibility for the welfare, health and safety of the NSW General Public to the regulatory authorities of the State who have already been found seriously wanting – more especially after the recent Four Corner expose's such as the EPA Waste management body…who is responsible for monitoring the WestConnex project.

Aircraft corridor….

https://www.icao.int/environmental-protection/Pages/Contaminants.aspx - which leaves a clear and toxic 'vapour trail' over dense residential areas such as Drummoyne, Rozelle, Leichhardt, Annandale and further into the Inner Suburbs so badly affected by the WestConnex project…and again knowingly ignored by those with vested interests…but in the event of future claims ***'ignorance is not a plausible excuse in a court of law'…ignorantia legis neminem excusat - "ignorance of the law excuses not"***

The list of chemicals contained in the 'vapour trail' are attached under separate cover… http://www.rcep.org.uk/reports/sr-2002-aircraft/documents/aviation-report.pdf and the effects both stratospherically and lower altitudes such as over densely populated residential areas…as Leichhardt… http://www.rcep.org.uk/reports/sr-2002-aircraft/sr-aviation.htm increases the fact that the cummulative effect of not just 'unfiltered emission towers' but road traffic and the inclusion of 'aircraft traffic' clearly breaches the Ozone Act…

Surrounding land uses could affect wind and airflow patterns – when a country such as Australia, and especially when a local government such as that led by the LNP in NSW…these considerations are studiously ignored…in order it is suggested to waive their liability and that of the SMC and the RMC…

https://www.scientificamerican.com/article/lead-in-aviation-fuel/

Aviation fuel emerged as the largest source of lead emissions in the U.S. once lead was phased out of automotive gasoline beginning in the 1970s. While jets, which comprise the majority of commercial aircraft, don't use leaded fuel, smaller, piston-engine planes use enough leaded aviation fuel (nicknamed "avgas") to account for half of the lead pollution in American skies, making it a real air quality issue.

http://www.dailytelegraph.com.au/newslocal/inner-west/historic-lead-contamination-means-the-soil-in-three-out-of-four-inner-west-gardens-contains-

potentially-dangerous-levels-of-the-chemical/news-story/8a7dfc96ee7711843eec5c92136bd330

Samples taken by Macquarie University found that the City of Sydney and the former Leichhardt and Marrickville council areas have Sydney's highest levels of soil lead.Gardens in Leichhardt had an average 960 milligrams of lead for every kilogram of soil.

Thus to further increase contamination by presenting a flawed EIS is not just negligent to the extreme but also exposes the will of all parties involved with the WestConnex project to deliberately and knowingly withhold vital 'data' from the public.

https://web.anl.gov/PCS/acsfuel/preprint%20archive/Files/21_6_SAN%20FRANCISCO_08-76_0219.pdf – the EPA, bureaucrats and their partners would do well to re-read their legal responsibilities/obligations as well as their 'legal duty of care' to those who are being impacted by knowingly and deliberately misleading and mis-informing the 'general public' per se, when it relates to their welfare, health and safety in relation to the workings being undertaken by SMC and the RMC…who therefore are deemed to be legally responsible under The Corporation's Act OH&S and WHS for not just themselves but also their partners and contractors, at all times…

https://web.anl.gov/PCS/acsfuel/preprint%20archive/Files/21_6_SAN%20FRANCISCO_08-https://www.icao.int/environmental-protection/Pages/Noise-Abatement-Operational-Procedures.aspx 76_0219.pdf

https://www.icao.int/environmental-protection/Pages/Noise-Abatement-Operational-Procedures.aspx -

The WestConnex project has exempted itself from all Noise Abatement Operational procedures….government ministers offer across the board protection from prosecution under the Noise Abatement laws….

http://www.environment.nsw.gov.au/questions/times-residential-noise-restrictions -
http://www.epa.nsw.gov.au/noise/noise_legislation.htm -
https://www.legislation.nsw.gov.au/#/view/regulation/2017/449 -

Also this is a development of allegedly State Significance and is in breach of its overarching SEPP – SEPP 33 – the question is when was that exemption applied, and by whom?

What are the symptoms of Aerotoxic Syndrome? (Aerotoxic happens inside the aircraft and also outside and in the aircraft flight path as is the case in the case of those living and working in the Inner West of Sydney, NSW)….

Symptoms may be acute, i.e. for a short time or chronic, i.e. long-lasting. Any combination of the following may be experienced:

- Fatigue – feeling exhausted, even after sleep

- Blurred or tunnel vision
- Shaking and tremors
- Loss of balance and vertigo
- Seizures
- Loss of consciousness
- Memory impairment
- Headache
- Tinnitus
- Light-headedness, dizziness
- Confusion / cognitive problems
- Feeling intoxicated
- Nausea
- Diarrhoea
- Vomiting
- Coughs
- Breathing difficulties (shortness of breath)
- Tightness in chest
- Respiratory failure requiring oxygen
- Increased heart rate and palpitations
- Irritation of eyes, nose and upper airways.

which is why the term 'syndrome' is used. Many general medical practitioners are unaware of Aerotoxic Syndrome and may diagnose sufferers with illnesses such as psychological or psychosomatic disorders (i.e., they'll tell you "it's all in your mind"), Chronic Fatigue Syndrome (CFS), "mysterious" viral infections, sleep disorders, depression, stress or anxiety – or simply "jet lag", which is caused by crossing time zones

Above is just a taste of what is euphemistically explained as to how passengers feel from what is known as 'aerotoxics' –

And equally what countless thousands within/under the flight path' especially in Drummoyne, Leichhardt, Rozelle and other Inner city suburbs – known to be flight path routes…

The EPA and its bureaucrats allegedly consistently lie in relation to the Rozelle air emissions station; alleging at its last reading and carefully orchestrated by the ***Channel 7 Crew*** – however it appears that what the Channel 7 Crew did not know was that the ' air monitoring station ' that they were taken to ***Australian Standards AS/NZS 3580.1.1:2007 - Methods for sampling and analysis of ambient air - Guide to siting air monitoring equipment as the clear sky angle is < 120O due to trees within 20 metres to the west of the monitoring site.***

Australian Map Grid (AMG) coordinates* (km): 6251.2 northing, 330.0 easting and zone 56

So that when every other suburb in NSW with the exception of Rozelle were showing 'toxic air emission readings' …….the clean air story that is being consistently played out in NSW and especially the Inner West continues to defy the odds especially as so many now drive those deadly emitters of 'diesel fumes' the four wheel vehicles –

https://www.theguardian.com/environment/2017/jan/06/diesel-cars-are-10-times-more-toxic-than-trucks-and-buses-data-shows - 34% of new vehicles in Australia are run on diesel….equally prop aircraft fuel contains high levels of lead - http://www.abc.net.au/news/2017-05-15/aviation-fuel-sniffing-on-elcho-island-a-public-emergency/8521020 - Authorities are warning of an unfolding public health emergency in north-east Arnhem Land, where dozens of young people are recording dangerously high lead levels after sniffing aviation fuel ..

Dirty Diesel…

http://www.abc.net.au/health/features/stories/2003/07/03/1835282.htm -

Diesel exhaust is more carcinogenic than cigarette smoke, but isn't regulated like smoking. Rather, our tax system encourages more diesel use in our cities. So where's the 'Quit' campaign against dirty diesel?

Health effects

 The small but growing proportion of diesel vehicles create most of the particle pollution in cities, causing respiratory and other diseases. (Pic: Mark Horstman)

Research overseas shows that people exposed to diesel exhaust at high levels in enclosed spaces for long periods of time – such as truck drivers, railway workers, and miners – face up to 30 per cent increased risk of lung cancers, even after the effects of smoking are taken into account.

In 2002, the US Environmental Protection Agency concluded that diesel exhaust is a "likely human carcinogen", and a "chronic respiratory hazard to humans...it is reasonable to presume that the hazard extends to environmental exposure levels".

Most state regulatory bodies in Australia accept there is no safe level of exposure to diesel exhaust. As well as cancer, other health hazards are respiratory illnesses and heart disease ***(with it must be said the exception being the rule, the NSW EPA and its Chief Scientist continue to espouse the notion that the areas that are host to the WestConnex project are the safest within NSW indeed as the EPA explained to the Channel 7 crew most recently, the only station to record clean air readings was known not to comply***

with Australian Standards – in ...(no dieseltrucks ever emit carcinogens in this area, ever)...indeed it is placed nowhere near any traffic whatsoever...

 The small but growing proportion of diesel vehicles create most of the particle pollution in cities, causing respiratory and other diseases. (Pic: Mark Horstman)

https://www.parliament.nsw.gov.au/committees/DBAssets/InquirySubmission/Body/40863/sub%2034.pdf – below passage taken from this submission…

http://www.condellpark.com/bear/smogbasin.htm - this article was written in 2001 and sadly nothing has changed – governments may change but with each new change of government comes a new set of ideology in that the welfare, health and safety of the general public and pockets of communities are seen as 'dispensable commodities;,,,in the interest of 'political donations'.

The Sydney basin is a classic "closed" basin, bounded by high terrain to the south, west and north, and by temperature differentials between land and ocean on the eastern side. Trapped pollution may accumulate and circulate inside the basin periods of up to several days [1, 2] until a strong wind, such as a "southerly buster" or strong westerlies, flushes 'dirty' air out of the basin. Temperature inversions exacerbate the smog trap situation with relative frequency. Sydney's highest lung cancer occurrences (NSW Cancer Council maps [3]) occur distinctly in two areas of the Sydney basin, areas that are strongly associated with air toxic pollution; i.e. primary pollution sources in the eastern part of the basin and an air pollution sink area in the western-south western Sydney basin.

Thus road traffic emissions and other transport emissions may contribute in much greater degree to long term human health problems than previously considered.

Health effects of diesel exhaust

- Coughs and phlegm
- Lightheadedness, nausea
- Increased susceptibility to allergens like dust or pollen
- Irritation of eyes, nose, throat and lungs
- Inflammation of lungs, and increased asthma attacks
- Respiratory diseases such as chronic obstructive pulmonary disease
- Lowered resistance to respiratory infection
- Macrophages overwhelmed by particles result in immune reactions that cause inflammation and 'sticky' blood, increasing risk of clots and both heart and lung disease

- Mutations in chromosomes and damage to DNA
- For people exposed chronically to 1µg/m³ of diesel exhaust, a rate of lung cancer in the range of 34 to 650 people per million
- Possible cause of multiple chemical sensitisation, leading to changes in red and white blood cells, bleeding, liver damage, and degeneration of the nervous system.

There are two things about diesel exhaust that affect our health: one is the particles and their size; the other is what the particles are made of. Particles are made whenever something is burned – whether wood, petrol, tobacco, gas or diesel. Diesel is popular for fuel economy, but the size, number and composition of the particles in its exhaust make it more toxic than other fuels.

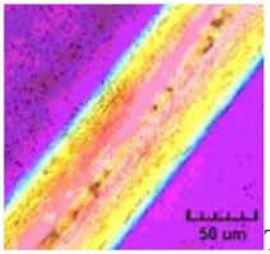
Burning diesel creates fine particles of oily carbon, ash, sulphates, and sulphuric acid that are ejected out the exhaust pipe and into the air. Diesel exhaust is thickest when the engine is old, working hard, or badly tuned, and the fuel has impurities.

While only 10 per cent of cars and trucks run on diesel, they're responsible for around 80 per cent of fine particles from vehicles. Along with road grit, bits of brake lining, tyre rubber, and exhaust from other fuels, they form mostly invisible dust storms in the concrete canyons and suburban savannas of our cities.

The high hazard zone for health is considered to be 150 metres either side of busy roads – particularly within 50 metres. Depending on the number of vehicles trailing plumes of particles in their wake, levels here can be two, three, up to 10 times higher than the usual city background – which is already unhealthily high.

As particle concentrations in the air rise, so do death rates, from a variety of causes. And the impacts add up over a lifetime. At greatest risk are children, with their developing lungs; the elderly, on top of a lifetime of exposure; and people with emphysema, asthma, and chronic heart and lung disease.

Size does count



The tiny black specks against the purple background are diesel soot particles, magnified approximately 300 times, next to a human hair for comparison. (Pic: South Coast Air Quality Management District, California)

How deeply particles can penetrate our bodies depends on their size. The most hazardous sizes are known as PM10 – Particulate Matter with diameters at or below 10 micrometres (10-thousandths of a millimetre – by comparison, the average width of

human hair is 80 micrometres). All fine particles fall within this category, and 75 per cent of PM10 comes from diesel exhaust.

Of even greater concern are the smallest subsets of this size range. Particles of diameter 2.5 micrometres or less (PM2.5) are smaller than our red blood cells and many bacteria. Unlike the larger fine particles, which are more likely to be caught in the nose or upper airways, these are carried deep into our lungs.

But it's the infinitesimal ultrafines and nanoparticles – 1 micrometre and smaller – that are suspected to be the hidden killers. Up to 99 per cent of particles are in the ultrafine size range. At 0.05 micrometres across – smaller than many viruses and able to waft through a surgical mask – nanoparticles can even squeeze through capillaries in the lung walls to enter the bloodstream.

Nanoparticles are created by sulphur in the diesel, an impurity that can be removed at the refinery. Reducing sulphur content to 5 parts per million (ppm) or lower eliminates nanoparticles. Particle traps and catalytic converters can then be used on exhaust pipes to remove even more ultrafine particles. Reducing sulphur from 500 ppm to 50 ppm also cuts sulphur dioxide emissions by 90 per cent.

Until this year, sulphur levels in Australian diesel were at 1,300 ppm, even 5,000 ppm in some cases. We now have a national standard of 500 ppm, still dirty by world standards. Even Delhi, the Indian capital notorious for air pollution, introduced cleaner diesel standards before Australia. The next target is 50 ppm, but this is not to be introduced until 2006. BP is the first company to start selling 'ultra-low sulphur' 50 ppm diesel in Australia. Meanwhile European countries use diesel with 5 ppm, and even

Diesel exhaust is a chemical cocktail of at least 450 different compounds, in poisonous gases like nitrogen oxides. The particles are coated in a mixture of toxic contaminants like arsenic, benzene, dioxins, toluene, formaldehyde, and heavy metals – even 3-nitrobenzanthrone and 1,8-dinitropyrene, the two most carcinogenic chemicals ever discovered.

Polyaromatic hydrocarbons (PAHs) are a group of more than 100 different chemicals found in all vehicle exhausts, such as the carcinogenic benzo[a]pyrene. Due to different chemical processes that attach oxides of nitrogen to PAHs, diesel exhausts are more toxic than petrol.

The particles act as a microscopic delivery system to carry these toxic payloads inside the body, and deep into the lungs. Because the particles can be retained in the body for long periods, our exposure to their chemical hitchhikers is greatly increased.

https://www.qut.edu.au/research-all/our-research/institutes-centres-and-research-groups/international-laboratory-for-air-quality-and-health/publications - when the science behind the toxic emissions has to highlight the notion that here in NSW the EPA, the CEO of SMC Dennis Cliché and each member of the RMC Board is legally liable for the welfare, health and safety of the all communities within NSW and in this particular

instance in relation to knowingly and deliberately presenting 'misleading information' when it relates to air emission testing and safety regulations such as high levels of truck usage both am and pm and during the night-time when air is at is most toxic….

Sydney Motorway Corporation and Roads and Maritime Corporation…

https://connectonline.asic.gov.au/RegistrySearch/faces/landing/SearchRegisters.jspx?_adf.ctrl-state=16j33y4m6i_4 –

Name:	ROADS AND MARITIME SERVICES
Registration number:	BN98582422
State of registration:	New South Wales
Registration date:	15/07/2011
Status:	Registered
Type:	Business Names
Principal place of business:	
Regulator:	Australian Securities & Investments Commission

Now what is not recognised with both the SMC and also the RMC that the overarching regulatory authority is the ASIC – but again as with most government run vested interest companies Greg Medcraft is allegedly less than eager to prosecute for endangerment under The Corporation's Act OH&S and WHS to the general public for the unsafe and continuous unsafe operation by not just the aforementioned companies but also their partners and contractors…known as viscarial liability or in a previous time the Master and Servant Act…meaning that the two aforementioned gentlemen are legally liable for the vagaries of those both directly and or indirectly in their employ. Especially if third party actions adversely impact on the welfare, health and safety of the general public and others…

http://www.rms.nsw.gov.au/safety/work-health-safety/documents/work-health-and-safety-policy.pdf -

Health and safety is integral to everything we do…says Ken Kanofski Chief Executive….

The Hierachy of Control –

Manage risk – eliminate before you minimise…

But it is evident that Mr. Ken Kanofski views the welfare, health and safety of those who have the temerity to live in the way of his WestConnex project, he is prepared to blatantly ignore those dictums (even though they are contained within the guidelines and demands of RMS government document) – it is a case of enforcement, bully and ignore…ignore the welfare, health and safety of men, women, children and babies…who he and his board see as expendable…bully those that complain and demand that the

RMS and SMC ignore all protests by the community and continue to emit misleading data…irrespective of the consequences.

As Chief Executive of Roads and Maritime Services I affirm my personal commitment to safety as our 'primary value'… …what a blatant lie… ….

He has personally put at risk thousands of innocent lives and continues to ignore his aforementioned commitment – and a commitment that the general public will hold him to in a court of law…he views the general public as an expendable commodity…

http://www.rms.nsw.gov.au/safety/work-health-safety/documents/work-health-and-safety-strategy.pdf -

Whilst Kanofski continues to espouse the importance of a safe workplace from which workers can go home safe and sound – he does not mention the fact that he is contemptuous of those living in communities adjacent to heavy industrial work sites – that operate 24 hours a day seven days a week…page six of this document highlights one of his safe work sites – dust everywhere and no water sprinkling in sight…nor does he espouse his concerns when thousands of people are covered night and day with asbestos contaminated dust…

http://www.rms.nsw.gov.au/safety/work-health-safety/documents/onerms-sms-manual.pdf - http://www6.austlii.edu.au/cgi-bin/viewdoc/au/legis/cth/consol_act/whasa2011218/s27.html - just to make it easier for all parties have included the whole of the Act…

WORK HEALTH AND SAFETY ACT 2011 - SECT 27 Duty of officers

WORK HEALTH AND SAFETY ACT 2011 - SECT 27

Duty of officers

(1) If a person conducting a business or undertaking has a duty or obligation under this Act, an officer of the person conducting the business or undertaking must exercise due diligence to ensure that the person conducting the business or undertaking complies with that duty or obligation.

(2) Subject to subsection (3), the maximum penalty applicable under Division 5 of this Part for an offence relating to the duty of an officer under this section is the maximum penalty fixed for an officer of a person conducting a business or undertaking for that offence.

(3) Despite anything to the contrary in section 33, if the duty or obligation of a person conducting a business or undertaking was imposed under a provision other than a provision of Division 2 or 3 of this Part or this Division, the

maximum penalty under section 33 for an offence by an officer under section 33 in relation to the duty or obligation is the maximum penalty fixed under the provision creating the duty or obligation for an individual who fails to comply with the duty or obligation.

Section 33 - **Failure to comply with health and safety duty--Category 3**

A person commits a Category 3 offence if:

(a) the person has a health and safety duty; and

(b) the person fails to comply with that duty.

Penalty:

(a) In the case of an offence committed by an individual (other than as a person conducting a business or undertaking or as an officer of a person conducting a business or undertaking)--$50 000.

(b) In the case of an offence committed by an individual as a person conducting a business or undertaking or as an officer of a person conducting a business or undertaking--$100 000.

(c) In the case of an offence committed by a body corporate--$500 000.

(4) An officer of a person conducting a business or undertaking may be convicted or found guilty of an offence under this Act relating to a duty under this section whether or not the person conducting the business or undertaking has been convicted or found guilty of an offence under this Act relating to the duty or obligation.

(5) In this section, ***due diligence*** includes taking reasonable steps:

(a) to acquire and keep up-to-date knowledge of work health and safety matters; and

(b) to gain an understanding of the nature of the operations of the business or undertaking of the person conducting the business or undertaking and generally of the hazards and risks associated with those operations; and

(c) to ensure that the person conducting the business or undertaking has available for use, and uses, appropriate resources and processes to eliminate or minimise risks to health and safety from work carried out as part of the conduct of the business or undertaking; and

(d) to ensure that the person conducting the business or undertaking has appropriate processes for receiving and considering information regarding incidents, hazards and risks and responding in a timely way to that information; and

(e) to ensure that the person conducting the business or undertaking has, and implements, processes for complying with any duty or obligation of the person conducting the business or undertaking under this Act; and

(f) to verify the provision and use of the resources and processes referred to in paragraphs (c) to (e).

Examples: For the purposes of paragraph (e), the duties or obligations under this Act of a person conducting a business or undertaking may include:

(a) reporting notifiable incidents;

(b) consulting with workers;

(c) ensuring compliance with notices issued under this Act;

(d) ensuring the provision of training and instruction to workers about work health and safety;

(e) ensuring that health and safety representatives receive their entitlements to training.

……

https://www.comcare.gov.au/the_scheme/regulatory_guides/primary_duty_of_care -

2. Primary duty of care towards other persons

Section 19(2) requires a PCBU to ensure, so far as is reasonably practicable,[4] that the health and safety of other persons—for example, persons other than the workers protected under section 19(1)—is not put at risk from work carried out as part of the conduct of the business or undertaking.

Again, the duty is not referable to a particular workplace. Rather, the duty to other persons relates to risks to health and safety 'from work'. These words are not defined in the WHS Act. Depending on their scope, section 19(2) could potentially apply in a broad-ranging way.

In practical terms, however, there may be few risks relating to other persons that a PCBU would not need to consider in relation to workers.

https://www.legislation.nsw.gov.au/inforce/f8df8095-a335-66a0-8828-f33d06042cb9/2011-10.pdf - however the CEO of SMC Dennis Cliché, Ken Kanofski

Chief Executive of RMS continue to breach the aforementioned act if it relates in anyway whatsoever the WestConnex project – bringing them both in breach of the aforementioned acts and legislation…thus using and abusing their office…which then brings them into misfeasance of public services act…Page 75 of the document is of most interest in that is sets out the delegation of the Regulator…

Now of course in NSW the public are well aware that both regulatory authorities charged with the protection of not just workers but also the general public's welfare, health and safety is carefully choreographed by the Minister and bureaucrats under whose portfolio the regulatory authority such as the EPA and SafeWork NSW falls…

http://www.finance.gov.au/sites/default/files/Uhrig-Report.pdf -

That government can engage in conduct through statutory authorities is a long and well-established concept. It follows that government, through Ministers, is accountable for statutory authorities. The accountability of specific Ministers is recognised through the Administrative Arrangements Order (AAO), issued from time to time by the Governor-General, which specifies the legislation administered by Ministers, including the enabling legislation of statutory authorities. Constitutionally, Ministers have a ***governance role and responsibility in respect of statutory authorities within their portfolios.***

And as importantly it is a well known fact of life that each of the regulatory authorities contain personnel that are referred to as the 'revolving door' or 'regulatory capture' bureaucrat **–**

In Australia, this is of significant public debate as many state leaders have become private consultants for corporations. There is no legislation against this revolving door in Australia.

Regulatory capture is a form of political corruption that occurs when a regulatory agency, created to act in the public interest, instead advances the commercial or political concerns of special interest groups that dominate the industry or sector it is charged with regulating. [1] Regulatory capture is a form of government failure; it creates an opening for firms or political groups to behave in ways injurious to the public (e.g., producing negative externalities). The agencies are called "captured agencies".

Hence the community of Leichhardt is held captured and indeed hostage by the RMS and the SMC their partners and contractors…and of course bureaucrats

Questions need to be asked as to why billions of dollars of taxpayer's money is being spent on a system that is essentially one of the worst unsupervised industrial operations ever to be contemplated –

No checks made when communities complain – more likely than not if those complaints were responded to, ***it would produce a paper trail,*** then the company that intends purchasing the SMC will and can be held liable for the actions of the company that they

have purchased…this will make for an extremely expensive and costly layout for said purchasing company…and in the event of Mesothelioma decades of payouts… to help the potential purchaser here are a few tips as per the ASIC… http://asic.gov.au/for-business/your-business/tools-and-resources-for-business-names-and-companies/asic-guide-for-small-business-directors/directors-liabilities-when-things-go-wrong/

St Peters…

http://www.csb.gov/csb-investigators-cite-lack-of-effective-management-systems-in-hydrogen-sulfide-incident-at-cincinnati-waste-disposal-plant/ - http://www.csb.gov/csb-releases-safety-bulletin-warning-of-dangers-of-sodium-hydrosulfide-nahs-in-the-workplace-outlines-safe-practices-to-prevent-harm/

The EPA, their PR office and the ubiquitous 'bureaucrats' again brought in to deny, deny and deny when families and pregnant women complain of 'toxic fumes' emanating into their daily lives and that of their unborn babies – the fumes suggested, have the same smell as 'hydrogen sulphide' a deadly, deadly gas…the regulatory authorities again citing no evidence and so no problem – creating a future generation prone to major health problems, such as cancer, lung congestion, heart diseases the spread across communities will be wide and the finger will be pointed directly at the CEO of SMC Dennis Cliché and also the Chief Executive of RMC Ken Kefoski but equally will be directed at the NSW State Government…it is suspected that future insurance claims will be high…and extremely costly.

And as one should point out the parties involved have knowingly and deliberately fabricated the true extent of the 'toxic nature/damage' to the local community especially those who are impacted 24hours a day from the 'toxic worksites' – however, why isn't the local Council involving themselves as under the Local Government Act they are responsible for 'contaminated worksites' within their boundaries…? ***https://www.lgnsw.org.au/policy/environment/contaminated-lands*** -

Such comments that 'all is safe' is just not true and is deliberately misleading - both the CEO of SMC Dennis Cliché and the Chief Executive of RMS Ken Kanofski – are blatant in allegedly presenting the 'victims' with false information - http://dictionary.findlaw.com/definition/reckless-disregard-of-the-truth.html - referred to as 'reckless disregard of the truth' - disregard of the truth or falsity of a statement by a person who is highly aware of its probable falsity or entertains serious doubts about its truth or when there are obvious reasons to doubt the veracity – and in so doing put the lives of thousands within the NSW Community adjoining the WestConnex project - ***a reckless lack of attention to the truth that misleads or deceives another -***

To expose, without an adequate/reliable EIS, using data provided by the Chief Scientist, who has already, allegedly, been shown wanting when relating to the use of creditable data is in itself a deliberate act of misinformation - by not just the Chief Scientist but also those that would wish to protect their own liability…indeed those who would use the Chief Scientist's and the EPA EIS would do well to remember that they indeed hold liability in the event of the EIS lacking correct and updated data… ***it is known again as***

vicarious liability… this document might be of interest to those that would ignore their legal responsibilities, liabilities and obligations, as they relate to not just the WestConnex project as a whole but also when it relates to the intentional adverse impact on the community by the use of an impending work site operating as it is intended 24 hours a day seven days a week, metres from the nearest home… that is the Darley Street civil/government dive and tunnel site… http://www.robinson.com.au/monoartpapers/papers/Personal%20Senior%20Public%20Sector%20Liability%20in%20Australia.pdf

http://www.austlii.edu.au/au/journals/SydLRev/2011/34.pdf - http://www6.austlii.edu.au/cgi-bin/viewdoc/au/legis/nsw/consol_act/lrla1983321/index.html -

this can be applied across the board, such as those working on sites, (involved in the WestConnex project) truck drivers the end list of those responsible is limitless…but the point of liability goes back directly to the SMC and the CEO Dennis Cliché and the Chief Executive of RMS Ken Kanofski…who both carry full legal responsibility for all bodies working for and on their behalf…but as importantly every bureaucrat and their Ministers along the chain of command.

"independent function" , in relation to a servant or a person in the service of the Crown, means a function conferred or imposed upon the servant or person, whether or not as the holder of an office, by the common law or statute independently of the will of the servant's master or the Crown, as the case may require.

Let the public not forget that the WestConnex is being undertaken for and on behalf of the NSW State Government who in turn are themselves seen as 'servants of the Crown'… and who continually espouse the notion that they are doing it for the betterment of the NSW General Public…

(Clearly tolls are good for the public wellbeing)……so implies Stuart Ayres and his bureaucrats…or rather their PR department…

Tolls are for the wealthy…everyday members of the public cannot afford tolls –

Wages are static and to further burden the general public is not only unconscionable but also very, very foolish – as there are more poor members of the general public who vote, than there are wealthy…

Everyday costs will rise dramatically as the working poor will have to decide whether they shop for food etc., or just get by and live more frugally than ever – so what the WestConnex and its tollways will ensure is that small businesses will again be hardest hit…but with the likes of Stuart Ayres spouting the notion that if you build it, it will be used as he hands over allegedly thousands of taxpayer's dollars from the SMC to his favourite football stadium – the tollway companies intent on making a fortune out of their tollways will again end up with egg on their faces – as with the Cross City Tunnel consortium,,,

http://www6.austlii.edu.au/cgibin/viewdoc/au/legis/nsw/consol_act/lrla1983321/s5.html#crown …..

The intended site in Darley Road, Leichhardt for the 24 hour usage of construction work is inhumane – and more likely than not will show an increase in cancer rates…

The Chief Executive of the RMS Ken Kanofski and the CEO of the SMC Dennis Cliché should offer free accommodation to all residents that will be impacted by the site usage – that all costs for temporary and identical accommodation will be met in full by the RMC and the SMC for intended five year duration – that includes the site line of the intended Tunnel excavations –

In that included within the body of the EIS is a clause which will include the relocation for the duration of all construction related to the WestConnex project – those costs again to be born by the Sydney Motorway Corporation – the cost of all clean up of areas adversely impacted by site operations again to be included in all EIS's to again be born by the Sydney Motorway Corporation…

Asbestos….

This is perhaps one of the more insidious inclusions in that SafeWork NSW, the EPA and their bureaucratic PR departments come yet again into their own – providing the 'a' typical response in that the companies in question are noted as being ever so good – this taken from the PR department called SIRA –

"SWNSW can confirm that the removal of all ACM as part of the WestConnex Project has been undertaken by a competent removalist who has demonstrated the qualifications, experience and skill to undertake this task" – and yet photographs suggest otherwise – but wait there is more – what is the betting that down the track all of the bureaucratic regulators and the government of the day suggest that 'asbestos' is now noted as being a 'safe material' – however, what SafeWork NSW also fails to say is that they themselves did not undertake any independent testing of said 'toxic materials and or dust'…or allegedly so.

2002/03

Way back in 2002/03 those of us living adjacent to Fox Studios Australia were fed the same comments – indeed Workcover as it was known then – actually gave the site a 'site clearance' certificate whilst standing beside a 560 sq metre 3-4 metre high uncovered friable asbestos dump with sheets of friable asbestos sticking out of the dump – running along the Moore Park Road, metres from homes – forcing on site workers to work a couple of metres from it to access an industrial factory – this was left for over two and half years billowing asbestos contaminated dust into the community – and yes the EPA was also involved making 34 site visits and not once noticing it – Douglas Partners exposing the dump, forcing Fox Studios Australia to remove it – but again the EPA's Waste Manager did not watch the removal instead as above citing that the removal company was competent, except they removed it by using front end loaders and putting the asbestos contaminated waste into dumpsters – late at night.

Below reiteration of clauses to be included within the body of the EIS…

- That all residents adjacent to and including both sides of the intended re-direction of heavy goods vehicles also be re-housed/homed for the full duration of the intended site operation – again at the cost of both the RMC and the SMC and again for a five year period…
- ……
- That for the duration of the tunnelling all residents to be re-homed for the full duration of said tunnelling, costs again to be born by The Sydney Motorway Corporation….
- ……
- That if at anytime it becomes evident that properties adjoining the site construction and subsequent 'tunnel construction' – after inspection from 'surveyors' again paid for by the aforementioned companies – find that there could be subsidence problems which effects the underpinning and or repair or complete rebuild of all affected properties and their foundations as per the Simpson report in 2006/07 when Eric Roozendaal was Roads Minister…and as per question by the Hon Member Dr. Arthur Chesterfield-Evans

https://www.parliament.nsw.gov.au/committees/DBAssets/InquiryEventTranscript/Transcript/8738/Hearing%203%201%20September%202006%20-%20Roads.pdf

http://www.abc.net.au/7.30/content/2005/s1487129.htm - https://www.parliament.nsw.gov.au/committees/DBAssets/InquiryOther/Transcript/8278/060829%20Cross%20City%20Tunnel%20First%20Report%20Government%20Response.pdf

What living under the 'flight path' together with road emissions can/is do to you… full text attached with this Submission on line……planes emit orgaophosphates – and lead…

AcetylAcetylcholinesterase Inhibitors: Pharmacology and Toxicology

Mirjana B Čolović,[1,*] Danijela Z Krstić,[2,*] Tamara D Lazarević-Pašti,[1] Aleksandra M Bondžić,[1] and Vesna M Vasić[1]
Author information ► Article notes ► Copyright and License information ►
This article has been cited by other articles in PMC.
Go to:

Abstract

Acetylcholinesterase is involved in the termination of impulse transmission by rapid hydrolysis of the neurotransmitter acetylcholine in numerous cholinergic pathways in the central and peripheral nervous systems. The enzyme inactivation, induced by various inhibitors, leads to acetylcholine accumulation, hyperstimulation of nicotinic and muscarinic receptors, and disrupted neurotransmission. Hence, acetylcholinesterase inhibitors, interacting with the enzyme as their primary target, are applied as relevant drugs and toxins. This review presents an overview of toxicology and pharmacology of reversible and irreversible acetylcholinesterase inactivating compounds. In the case of reversible inhibitors being commonly applied in neurodegenerative disorders treatment, special attention is paid to currently approved drugs (donepezil, rivastigmine and galantamine) in the pharmacotherapy of Alzheimer's disease, and

toxic carbamates used as pesticides. Subsequently, mechanism of irreversible acetylcholinesterase inhibition induced by organophosphorus compounds (insecticides and nerve agents), and their specific and nonspecific toxic effects are described, as well as irreversible inhibitors having pharmacological implementation. In addition, the pharmacological treatment of intoxication caused by organophosphates is presented, with emphasis on oxime reactivators of the inhibited enzyme activity administering as causal drugs after the poisoning. Besides, organophosphorus and carbamate insecticides can be detoxified in mammals through enzymatic hydrolysis before they reach targets in the nervous system. Carboxylesterases most effectively decompose carbamates, whereas the most successful route of organophosphates detoxification is their degradation by corresponding phosphotriesterases.

Keywords: Acetylcholine, acetylcholinesterase, Alzheimer's disease drugs, carbamates, detoxification, irreversible inhibitors, organophosphates, reversible inhibitors.
Go to:

CHOLINESTERASES 1.

Cholinesterase is a family of enzymes that catalyzes the hydrolysis of the neurotransmitter acetylcholine (ACh) into choline and acetic acid, a reaction necessary to allow a cholinergic neuron to return to its resting state after activation. It involves two types:

1. Acetylcholinesterase (AChE, acetycholine acetylhydrolase, E.C. 3.1.1.7) is found in many types of conducting tissue: nerve and muscle, central and peripheral tissues, motor and sensory fibers, and cholinergic and noncholinergic fibers. The activity of AChE is higher in motor neurons than in sensory neurons [1-3]. AChE is also found in the red blood cell membranes, where it constitutes the Yt blood group antigen. The enzyme exists in multiple molecular forms, which possess similar catalytic properties, but differ in their oligomeric assembly and mode of attachment to the cell surface. In the mammalian brain the majority of AChE occurs as a tetrameric, G4 form (10) with much smaller amounts of a monomeric G1 (4S) form [4].
2. Pseudocholinesterase (BuChE, EC 3.1.1.8), also known as plasma cholinesterase, butyrylcholinesterase, or acylcholine acylhydrolase, is found primarily in the liver. Different from AChE, BuChE hydrolyzes butyrylcholine more quickly than ACh [5].

1.1. Acetylcholine as Neurotransmitter

The first neurotransmitter discovered ACh is neurotransmitter at all autonomic ganglia, at many autonomically innervated organs, at the neuromuscular junction, and at many synapses in the central nervous system. In the autonomic nervous system, ACh is the neurotransmitter in the preganglionic sympathetic and parasympathetic neurons, as well as at the adrenal medulla and serves as the neurotransmitter in all the parasympathetic innervated organs. ACh is also the neurotransmitter at the sweat glands, and at the piloerector muscle of the sympathetic autonomic nervous system. In the peripheral nervous system, ACh is the neurotransmitter at the neuromuscular junction between the motor nerve and skeletal muscle. In the central nervous system, ACh is found primarily in interneurons, and a few important long-axon cholinergic pathways have also been identified. Noteworthy is the cholinergic projection from the *nucleus basalis* of Meynert (in the basal forebrain) to the forebrain neocortex and associated limbic structures. Degeneration of this pathway is one of the pathologies associated with Alzheimer's disease (AD) [6, 7].

ACh is synthesized by a single step reaction catalyzed by the biosynthetic enzyme choline acetyltransferase and the presence of this enzyme is the "marker" that a neuron is cholinergic. The majority of the ACh in nerve endings is contained in clear 100 nm vesicles and a small amount is also free in the cytosol. The uptake of ACh into storage vesicle occurs through an energy-dependent pump that acidifies the vesicle [7]. During neurotransmission, ACh is released from the nerve into the synaptic cleft and binds to ACh receptors (nicotinic and muscarinic) on the post-synaptic membrane, relaying the signal from the nerve. AChE, also located on the post-synaptic membrane, terminates the signal transmission by hydrolyzing ACh. The liberated choline from the ACh decomposition is taken up again by the pre-synaptic nerve and the neurotransmitter is synthesized by combining with acetyl-CoA through the action of choline acetyltransferase (Fig. **11**) [8, 9].

Fig. (1)
Mechanism of AChE action in neurotransmission.

1.2. Acetylcholinesterase – Structure and Catalytical Function

AChE is a serine hydrolase mainly found at neuromuscular junctions and cholinergic brain synapses. Its principal biological role is termination of impulse transmission at cholinergic synapses by rapid hydrolysis of the neurotransmitter ACh to acetate and choline. AChE has a remarkably high specific catalytic activity, specially for a serine hydrolase - each molecule of AChE degrades about 25000 molecules of ACh per second, approaching the rate of a diffusion-controlled reaction [10, 11].

The molecule has an ellipsoidal shape with dimensions ~ 45 Å by 60 Å by 65 Å. The enzyme monomer is an α/β protein containing 12 – stranded central mixed β sheet surrounded by 14 α helices. The most remarkable feature of the structure is a deep and narrow gorge, ~ 20 Å long penetrating halfway into the enzyme and widens out close to its base [12]. The active site of AChE is located 4 Å from the bottom of the molecule and comprises two subsites - the "anionic" subsite and "esteratic" subsite corresponding to the catalytic machinery and the choline-binding pocket, respectively [13]. The anionic subsite, uncharged and lipophilic, binds the positive quartenary amine of choline moiety of ACh, as well as both quartenary ligands (edrophonium, N-methylacridinium) acting as competitive inhibitors [14, 15], and quartenary oximes which effectively reactivate organophosphate-inhibited AChE [16]. The cationic substrates are not bound by a negatively-charged amino acid in the anionic site, but by interaction of 14 aromatic residues that line the gorge leading to the active site. [17-19]. All 14 amino acids in the aromatic gorge are highly conserved across different species [20]. Among the aromatic amino acids, tryptophan 84 is critical and its substitution with alanine causes a 3000-fold decrease in the enzyme activity [21]. The esteratic subsite, where ACh is hydrolyzed to acetate and choline, contains, similar to the catalytical subsites of other serine hydrolases, the catalytic triad of three amino acids: serine 200, histidine 440 and glutamate 327 (Fig. **22**).

Fig. (2)
Schematic representation of AChE binding sites.

The hydrolysis reaction of the carboxyl ester leads to the formation of an acyl-enzyme and free choline. Then, the acyl-enzyme undergoes nucleophilic attack by a water molecule, assisted by the histidine 440 group, liberating acetic acid and regenerating the free enzyme (Fig. **33**) [13].

Fig. (3)
Mechanism of ACh hydrolysis catalyzed by AChE.

In addition to two subsites of active centre, AChE contains one or more "peripheral" anionic sites distinct from the choline-binding pocket of the active site (Fig. **22**). It serves for binding ACh and other quartenary ligands acting as uncompetitive inhibitors that bind at a site clearly distinct from that occupied by the monoquartenary competitive inhibitors [22]. This site is involved in the substrate inhibition characteristics of AChE [23].

Knowledge of AChE structure is essential for understanding its high catalytic efficacy and the molecular basis for the recognition of ACh by other ACh-binding protein (ACh receptors), as well as elucidation of the mechanism of action underlying the pharmacological and toxicological action of these agents for the purpose of rational drug design [24].

In this review pharmacological and toxicological relevant AChE inhibitors are summarized, mechanism of their action, and the ways of detoxification of irreversible and reversible AChE inactivators are discussed as well.

Go to:

ACETYLCHOLINESTERASE INHIBITORS 2.

AChE inhibitors or anti-cholinesterases inhibit the cholinesterase enzyme from breaking down ACh, increasing both the level and duration of the neurotransmitter action. According to the mode of action, AChE inhibitors can be divided into two groups: irreversible and reversible**.** Reversible inhibitors, competitive or noncompetitive, mostly have therapeutic applications, while toxic effects are associated with irreversible AChE activity modulators.

2.1. Reversible Acetylcholinesterase Inhibitors

Reversible AChE inhibitors play an important role in pharmacological manipulation of the enzyme activity. These inhibitors include compounds with different functional groups (carbamate, quaternary or tertiary ammonium group), and have been applied in the diagnostic and/or treatment of various diseases such as: myasthenia gravis, AD, post-operative ileus, bladder distention, glaucoma, as well as antidote to anticholinergic overdose.

2.1.1. Reversible Acetylcholinesterase Inhibitors in Alzheimer's Disease Treatment

AD is a progressive neurological disorder, the most common form of dementia, characterized by memory loss and other intellectual abilities serious enough to interfere with daily life [25]. The disease is associated with loss of cholinergic neurons in the brain and the decreased level of ACh [26]. The major therapeutic target in the AD treatment strategies is the inhibition of brain AChE [26, 27]. There is no cure for AD, and reversible AChE inhibitors, employed in the therapy, treat symptoms related to memory, thinking, language, judgment and other thought processes.

Actually, different physiological processes related to AD damage or destroy cells that produce and use ACh, thereby reducing the amount available to deliver messages to other cells. Cholinesterase inhibitor drugs, inhibiting AChE activity, maintain ACh level by decreasing its breakdown rate. Therefore, they boost cholinergic neurotransmission in forebrain regions and compensate for the loss of functioning brain cells. No drug has an indication for delaying or halting the progression of the disease [28]. Medications currently approved by regulatory agencies such as the U.S. Food and Drug Administration (FDA) and the European Medicines Agency (EMA) to treat the cognitive manifestations of AD and improve life quality of the patients are: donepezil, rivastigmine and galantamine as reversible AChE inhibitors, and memantine as an NMDA receptor antagonist [29, 30, 31]. Tacrine was the first of the AChE inhibitors approved for the AD treatment in 1993, but its use has been abandoned because of a high incidence of side effects including hepatotoxicity [32, 33].

Donepezil

(Fig. **44**) is a selective, reversible AChE inhibitor that binds to the peripheral anionic site exerting not only symptomatic effects in the AD treatment, but also causative ones delaying the deposition of amyloid plaque [34, 35]. The drug is produced by pharmaceutical companies Eisai and Pfizer under the trade name Aricept. Although its principal therapeutic use is in the palliative treatment of mild to moderate AD, some clinical studies state that donepezil improves cognitive function in patients with severe AD symptoms as well [36]. It is available as disintegrating tablet and oral solution, being 100% oral bioavailability with ease crossing the blood-brain barrier and slow excretion. As it has a half-life of about 70 hours, it can be taken once a day. The drug is available in 5 and 10 mg dose strengths, and treatment is usually initiated at 5 mg per day, and increased after several weeks to 10 mg per day. Maximum daily dose is 23 mg once daily [37]. Patients receiving the higher dose showed mild improvement in cognitive functions, and no improvement on overall functioning. On the other hand, the higher drug dose induced the increased incidence of cholinergic side effects in patients, which limited its wider use [38]. Common donepezil adverse effects include gastrointestinal anomalies-nausea, diarrhea, anorexia, abdominal pain, as well as increase in cardiac vagal tone causing bradycardia [39]. Additionally, recent studies have suggested donepezil ability to improve speech in children with autism, while its indication in other cognitive disorders such as Lewy body dementia, schizophrenia and vascular dementia is not currently approved [40-42].

Fig. (4)
Selected reversible AChE inhibitors in pharmacotherapy of AD.

Rivastigmine

(Fig. **44**) (sold under the trade name Exelon) is a powerful, slow-reversible carbamate inhibitor that blocks cholinesterase activity through binding at the esteratic part of the active site. Unlike donepezil that selectively inhibits AChE, rivastigmine inhibits both BuChE and AChE. It has received approval for the treatment of mild-to-moderate AD in 60 countries including all member states of the European Union and the USA [43]. The drug is administered orally as capsules or liquid formulations, with good absorption and bioavailability of about 40% in the 3 mg dose. It is eliminated through the urine and has relatively few drug-drug interactions. The treatment is initiated at 1.5 mg twice daily, and is increased gradually over weeks to 6 mg twice daily; the increment is 3 mg per day every 2 to 4 weeks. Early and continued treatment of AD with rivastigmine maximizes the observed beneficial effects in the rate of decline of cognitive function,

activities of daily living, and severity of dementia with daily doses of 6 to 12 mg. Adverse events are consistent with the cholinergic actions of the drug, and include nausea, vomiting, diarrhea, anorexia, headache, syncope, abdominal pain and dizziness [32, 44]. The side effects can be reduced using transdermal patch delivering rivastigmine. The target dose of 9.5 mg/day delivered by patch provides similar clinical effects (improved memory and thinking, activities of daily living, concentration) as the highest recommended doses of rivastigmine capsules, but with three times fewer reports of nausea and vomiting [45]. In addition to AD, rivastigmine can be applied in the treatment of Lewy bodies and Parkinson's disease dementia [43, 46].

Galantamine

(trade name Razadyne, Nivalin) is an alkaloid (Fig. **44**) isolated from the plant *Galanthus woronowii* being applied for the treatment of mild to moderate AD. It is a selective, competitive, rapidly-reversible AChE inhibitor that interacts with the anionic subsite, as well as with the aromatic gorge [47-49]. Besides, the drug is an allosteric ligand at nicotinic cholinergic receptors inducing their modulation. It interacts with the nicotinic receptor at binding sites separate from those for ACh and nicotinic agonists, and acts specifically to enhance the activity (sensitize) of nicotinic receptors in the presence of ACh [50, 51]. As the severity of cognitive impairment in AD correlates with loss of nicotinic receptors, this effect appears to be beneficial for the disorder treatment [52]. Galantamine absorption is rapid and complete, with absolute oral bioavailability between 80 and 100% and seven hours half-life. The treatment is usually initiated at 4 mg twice daily, and can be increased gradually up to 12 mg twice daily [39]. The drug side effects are similar to those of other AChE inhibitors, mainly with gastrointestinal symptoms. Galantamine seems to be less tolerated compared with the other AD drugs. However, a careful and gradual titration over more than three months may improve long-term tolerability [29]. Since galantamine has allosteric potentiating effects at nicotinic receptors, it affects not only cholinergic transmission but also other neurotransmitter systems such as monoamines, glutamate, and γ-aminobutyric acid (GABA) through its allosteric mechanism. These effects may result in more beneficial effects, and improve cognitive dysfunction and psychiatric illness in schizophrenia, major depression, bipolar disorder and alcohol abuse [53].

Considering the clinical effects of donepezil, rivastigmine and galantamine, there is no evidence that any of these medications is superior in terms of efficacy. However, donepezil has been found to be better tolerated, with less gastrointestinal side effects than rivastigmine or galantamine [39]. Beside the described drugs approved by FDA and EMA for the AD symptomatic treatment, new AChE inhibitors have been synthesized and tested. So, the derivative of hepatotoxic tacrine (Fig. **44**) - the potent inhibitor of AChE anionic active site, 7-methoxytacrine was widely studied as a suitable substitute to tacrine. *In vitro* and *in vivo* tests indicated both its less toxic effects and stronger inactivating power against AChE related to tacrine [54]. Furthermore, natural alkaloid huperzine A (Fig. **44**) is originated from the firmoss *Huperzia serrata*, and can be synthesized as well. The target of this AChE inhibitor is the peripheral anionic site, which makes the AD drug able to affect the symptoms as well as the cause of the disorder [55, 49] (see about donepezil above). The drug is a more potent AChE inhibitor than tacrine, galantamine and rivastigmine, while donepezil exhibits higher anti-AChE activity. Compared to other AChE inhibitors, huperzine A demonstrated better penetration through blood-brain barrier, higher oral bioavailability and longer AChE inhibition. Clinical trials with this AChE inhibitor revealed cognitive and functional impairments at patients with AD, schizophrenia and vascular dementia, and memory improvement of elder people [56]. In addition, protoberbrine alkaloids (berberine, palmatine, jatrorrhizine, epiberberine), as natural robust AChE inhibitors, are contemplated promising symptomatic therapeutic agents for AD [57]. It is necessary to emphasize that the pharmacological profile of the eutomer (bioactive enantiomer or enantiomer having higher

pharmacological activity) and distomer (opposite to eutomer) of the chiral drugs (e.g. donepezil, rivastigmine, galantamine) is differential.

Looking for potent and selective AChE inhibitors as potential anti-Alzheimer drugs, new compounds have recently been designed, synthesized and tested. Novel donepezil-tacrine and oxoisoaporphine-tacrine congeners hybrid related derivatives, coumarin and huperzine A derivatives have exhibited high AChE inhibitory activity with IC_{50} values in the nanomolar range, and ability to bind simultaneously to both peripheral and catalytic sites of the enzyme. For the reason, these dual binding site inhibitors are promising compounds for developing disease-modifying drugs for the future treatment of AD [58-62], Additionally, new synthesized symmetrical bispyridinium and carbamate anti-AChE compounds inhibit the enzyme in micromolar concentrations, making them the potential candidates for the treatment of AD [63, 64].

Generally, the disadvantage of the AChE inhibitors in AD treatment is modest and temporary benefits lasting for a maximum 12-24 months. Actually, these drugs do not reduce the rate of decline in cognitive or functional capacities over the long term [65, 66]. Despite this fact, reversible AChE inhibitors provide meaningful symptomatic benefits, thereby remaining the mainstay of pharmacotherapy in AD. Moreover, their use is standard and supported by evidence [39].

2.1.2. Carbamates

Carbamates are organic compounds derived from carbamic acid (NH_2COOH). The structure of biologically active carbamates is displayed in Fig. (**5**), where X can be oxygen or sulphur (thiocarbamate), R_1 and R_2 are usually organic or alkyl substituents, but R_1 or R_2 may also be hydrogen, and R_3 is mostly an organic substituent or sometimes a metal. In addition to their use as therapeutic drugs in human medicine (AD, myasthenia gravis, glaucoma, Lewy bodies, Parkinson's disease), these reversible AChE inhibitors have been applied as pesticides, then as parasiticides in veterinary medicine, and in prophylaxis of organophosphorus compounds (OPs) poisoning as well [67].

Fig. (5)
General chemical structure of biologically active carbamates.

Since carbamates, as well as OPs, are AChE inhibitors, both compounds cause similar toxic acute effects and symptoms derived from poisoning. The principal difference between OP and carbamate induced inhibitory action is in the stability of the AChE-OP/carbamate complex. Actually, OPs are able to phosphorylate serine residues of AChE in non-reversible way (Fig. **6**), whereas the carbamylated serine residue is less stable and the carbamyl moiety can be split from the enzyme by spontaneous hydrolysis (decarbamylation time is 30-40 minutes) [68, 69]. Therefore, carbamates are considered reversible AChE inhibitors. Furthermore, carbamates, analogously to OPs, reversibly inhibit neuropathy target esterase, but, unlike OPs, are not able to dealkylate *i.e.* age the inhibited enzyme. So, carbamates are not delayed neuropathy inducers (see more about OP induced neuropathy below) [70, 71]. Moreover, they exhibit protective effects when applied before OPs induced neuropathy. Thereupon, the neuropathic OPs are not able to inhibit and age neuropathy target esterase previously reversibly inhibited by carbamates. On the other hand, carbamates stimulate delayed neuropathy or make it more severe, when they are dosed after applying OP neuropathic doses, inducing promotion of delayed neuropathy [72].

Fig. (6)
Mechanism of AChE inhibition induced by OPs; reactivation, spontaneous hydrolysis, and aging of the phosphorylated enzyme.

Carbamate compounds are applied as fungicides, insecticides and herbicides in agriculture, and belong to the second group of pesticides inhibiting cholinesterases. Carbamates containing hydrogen and methyl group in the place of R_2 and R_1 (Fig. **55**), respectively, exert the insecticide activity. Carbamate insecticides include aldicarb, carbofuran, carbaryl, fenobucarb, propoxur (Fig. **77**). Their insecticide killing action is based on reversible AChE inactivation. Carbamates are considered to be safer than OP insecticides that irreversibly inhibit AChE causing more severe cholinergic poisoning [67, 73-75]. It was found that stress conditions can improve carbamates diffusion into the central nervous system, while the blood brain barrier penetration in the healthy body is prevented [76].

Fig. (7)
Selected carbamate insecticides.

Some carbamate compounds are used as herbicides such as ferbam, mancozeb, thiram (Fig. **88**). In addition, carbamates exhibit fungicide activity as well – butylate, pebulate, metham, molinate, cycloate, vernolate (Fig. **88**). It is generally thought that their acute toxicity to humans is low, but they may irritate skin, eyes and throat causing sneezing and coughing [67].

Fig. (8)
Selected carbamates being applied as herbicides and fungicides.

Carbamates, due to their reversible AChE inhibitory action, found an important application in human medicine as pharmacologically active compounds. Natural carbamate derivate physostigmine (Fig. **99**), the secondary metabolite in the plant *Physostigma venenosum*, is widely used in the treatment of myasthenia gravis. As a potent AChE inhibitor, this therapeutic agent reduces ACh hydrolysis rate, and thereby increases its level in damaged neurosynaptic clefts improving nerve impulse transmission. Besides, pyridostigmine (Fig. **99**) is capable to prevent the irreversible binding of OP to AChE. Consequently, it is applied as a prophylactic against nerve agent intoxication [77-79]. Furthermore, rivastigmine (Fig. **44**) is a carbamate with probably the most meaningful pharmacological application, being validated in the symptomatic treatment of AD (see above).

Fig. (9)
Structural formula of physostigmine and pyridostigmine.

2.2. Irreversible Acetylcholinesterase Inhibitors – Organophosphorus Compounds

OPs are esters or thiols derived from phosphoric, phosphonic, phosphinic or phosphoramidic acid (Fig. **1010**).

Fig. (10)
General structural formula of OPs.

R_1 and R_2 are aryl or alkyl groups that are bonded to the phosphorus atom either directly (forming phosphinates), or through an oxygen or sulphur atom (forming phosphates or phosphothioates). In some cases, R_1 is directly bonded to the phosphorus atom, and R_2 is bonded to an oxygen or sulphur atom (forming phosphonates or thiophosphonates). In phosphoramidates, at least one of these groups is $-NH_2$ (un-, mono- or bi-substituted), and the atom double-bonded with phosphorus is either oxygen or sulphur. The –X group, also binding to the phosphorus atom through oxygen or sulphur atom, may belong to a wide range of halogen, aliphatic, aromatic or heterocyclic groups. This "leaving group" is released from the phosphorus atom when the OP is hydrolyzed by phosphotriesterases or upon interaction with protein targets. In medicine and agriculture, the word "organophosphates" refers to a group of insecticides and nerve agents that inhibit AChE [52, 71, 80].

The OPs exert their main toxicological effects through non-reversible phosphorylation of esterases in the central nervous system [81, 82]. The acute toxic effects are related to irreversible inactivation of AChE [82]. Actually, OPs are substrate analogues to ACh, and like natural substrate enter the active site covalently binding to serine –OH group. As in acetylation, OP is split and the enzyme is phosphorylated (Fig. **66**). While the acyl enzyme is quickly hydrolyzed to regenerate the free enzyme, dephosphorylation is very slow (on the order of days), and phosphorylated enzyme cannot hydrolyze the neurotransmitter [83]. The inhibition of the enzyme leads to accumulation of ACh in the synaptic cleft resulting in over-stimulation of nicotinic and muscarinic ACh receptors and impeded neurotransmission. The typical symptoms of acute poisoning are agitation, muscle weakness, muscle fasciculations, miosis, hypersalivation, sweating. Severe poisonings may cause respiratory failure, unconsciousness, confusion, convulsions and/or death [82, 84-86].

Mechanism of OPs induced AChE inhibition is presented using the reaction scheme:

$$E+PX \rightleftarrows E*PX \rightarrow k3EP+X$$

where, E–enzyme, PX–OP, E*PX–reversible enzyme-OP complex, EP–phosphorylated enzyme, X–OP leaving group [87].

Irreversible inhibition occurs in two steps; the first one is fast, short term reversible enzyme inactivation, and its influence is dominant in the begining of the inhibition. The next step is slow irreversible inhibition producing a very stable enzyme-inhibitor complex (phosphorylated enzyme)-inhibitor is covalently bonded to the enzyme [88]. Time dependent irreversible inhibition can be described by the equation:

$$\ln EE0 = -k3t1 + KI/(I)$$
(1)

where, E/Eo–remaining enzyme activity related to initial enzyme activity (control) (E_o), K_I–dissociation constant for enzyme-inhibitor complex E*PX, k_3–the first rate constant for the conversion of the reversible enzyme-inhibitor complex to phosphorylated enzyme, EP, (I)–inhibitor (OP) concentration, t–time interval after the enzyme and inhibitor mixing. If (I) » (E_o),

the reciprocal slope value of linear dependence ln(E/Eo) - t (Fig. **11a**) can be presented in the form:

$$1kapp=1k3+KIk3\cdot 1(I)$$
(2)

Fig. (11)
(**a**). Progressive development of inhibition produced by reaction of AChE with different concentrations of diazoxon plotted as semi logarithmic curve in accordance with Equation (1). Diazoxon concentrations (in mol/l): (1) 2×10^{-8}, (2) $3 \times$ **...**

The values of inhibition parameters, K_I and k_3, are calculated from the slope and intersection of $1/k_{app}$ - 1/(I) linear dependence (Fig. **11b**) [89,90].

Effective OPs have the following structural features: a terminal oxygen connected to phosphorus by a double bond (oxo form), two lipophilic groups ($-R_1$, $-R_2$) bonded to the phosphorus, and a good leaving group (–X) bonded to the phosphorus (Fig. **10**) [91].

OPs can produce delayed neurotoxic effect in humans and chickens, called OP induced delayed neuropathy. It is associated with phosphorylation and further dealkylation (aging) (Fig. **6**) of a protein in neurons called neuropathy target esterase, subsequently leading to this syndrome. The symptoms of this neuropathy are paralysis and ataxia, and appear between 14 and 24 days after the poisoning [67, 70, 71].

2.2.1. Organophosphorus Insecticides

The majority of OPs have been commonly used as nonspecific insecticides for over fifty years, to control a variety of insects in agriculture and the household environment. The synthesis of OP pesticides in large quantities started after World War II, and parathion was among the first marketed, followed by malathion and azinphosmethyl. Commonly used OP insecticides have included ethyl parathion, malathion, methyl parathion, chlorpyrifos, diazinon, dichlorvos, phosmet, fenitrothion, tetrachlorvinphos, azinphos methyl, pirimiphos-methyl, dimethoate, phosalone (Fig. **12**) [74, 75, 91-93]. In the 1970s organochlorine insecticides (DDT, dieldrin, aheptachlor) were banned because of their persistence and accumulation in the environment, and replaced by more degradable OPs.

Fig. (12)
Selected OP insecticides.

Actually, OP insecticides in the environment undergo the natural degradation pathway including mainly homogeneous and heterogeneous hydrolysis (especially at high pH) enhanced by the presence of dissolved metals, humic substances, microorganisms and other compounds present in soil [94-96]. OP degradation processes also occur in chemical treatments for purification of polluted waters, generally referred as advanced oxidation processes, as well as throughout the enzymatic reactions in birds, fish, insects and mammals. Degradation studies revealed different kinetics, mechanisms and transformation products, suggesting complete mineralization of the starting compound (usually thio form), but forming toxic break down products as well [89, 97-100]. Actually, oxidation and isomerisation reaction products were reported as much more potent

AChE inhibitors compared to the starting thio OPs, while hydrolysis products do not noticeably affect the enzyme activity. Inhibition parameters, IC_{50} and K_i, for diazinon, malathion, chlorpyrifos and their transformation products are given in Table **11**, indicating even several hundred times lower IC_{50} values for oxo and iso forms related to the thio compounds, and non-inhibiting hydrolysis products [89, 90, 101].

Table 1
IC_{50} and K_I Values for Irreversible Inhibition of AChE Activity by Diazinon, Chlorpyrifos, Malathion, and their Transformation Products

Although OPs insecticides degrade rapidly, that made them an attractive alternative to the organochloride pesticides, they have greater acute toxicity, posing risks to people who may be exposed to large amounts - workers employed in the manufacture and application of these pesticides. OPs are one of the most common causes of poisoning worldwide occurring as a result of agricultural use, suicide or accidental exposure. OP pesticides can be absorbed by all routes, including inhalation, ingestion, and dermal absorption [102]. Their toxicity is not limited to the acute phase, but chronic effects have long been noted. Actually, repeated or prolonged exposure to OPs may result in the same effects as acute exposure including the delayed symptoms. The effects, reported in workers repeatedly exposed, include impaired memory and concentration, disorientation, severe depressions, irritability, confusion, headache, speech difficulties, delayed reaction times, nightmares, sleepwalking and drowsiness or insomnia. Influenza-like condition with headache, nausea, weakness, loss of appetite, and malaise has also been reported [103]. Neurotransmitters such as ACh are profoundly important in the brain's development, and many OPs have neurotoxic effects on developing organisms, even from low levels of exposure, causing various diseases of nervous and immune system [85, 104].

Oxo forms of OP insecticides,are highly, approximately equally toxic to warm-blooded as well as cold-blooded organisms. On the other hand, thio forms are converted into the oxo forms by mixed function oxidases. The activation proceeds in cold-blooded organisms but this is not common in warm-blooded organisms where dealkylation into non toxic compounds takes place [51, 105]. Thus, numerous derivatives of highly toxic insecticides have been prepared to reduce the toxicity towards warm-blooded organisms and retain toxicity to insects, thereby enhancing their specificity. The examples of effective, commonly used OP insecticides, and relative safe for warm-blooded organisms are: malathion, chlorpyrifos, fenitrothion, pirimiphos-methyl, dimethoate, phosalone [51].

Nowadays, the common use of OP insecticides results in their accumulation, environmental pollution and acute and chronic poisoning events [106]. For this reason, the use of OP insecticides has to be strictly controlled and restricted. Accordingly, the majority of countries have strong regulations on the application of pesticides; e.g. in the European Union it is regulated by the directive 91/41/EHS [51]. Also, the applied insecticides and their by-products in the environment, water and food are monitored applying different bioanalytical techniques [107].

2.2.2. Organophosphorus Nerve Agents/Gases

Nerve agents of OP group include tabun, sarin, soman, cyclosarin and VX. Sarin, soman and cyclosarin are phosphonofluoridates, and VX is a phosphonothioate (Fig. **13**). Soman has four, while sarin and VX have two isoforms, which significantly differ in toxicity and irreversible AChE inactivation rate. Based on the acute toxicity, VX is the most toxic compound among all the

nerve agents [67]. The developing and production of these extremely toxic nerve agents started in the 1930s, and later used in wars and by terrorists on several occasions. As chemical weapons, they are classified as weapons of mass destruction by the United Nations, and their production and stockpiling was outlawed by the Chemical Weapons Convention.

Fig. (13)
Selected nerve agents.

Acute poisoning by a nerve agent leads to contraction of pupils, profuse salivation, convulsions, involuntary urination and defecation, and eventual death by asphyxiation as control is lost over respiratory muscles. Some nerve agents are readily vaporized or aerosolized and the primary portal of entry into the body is the respiratory system. Nerve agents can also be absorbed through the skin, requiring that those exposed to such agents wear a full body suit in addition to a respirator [108]. Moreover, the effects of nerve agents are very long lasting and cumulative (increased by successive exposures), and survivors of nerve agent poisoning usually suffer chronic neurological damage that can lead to continuing psychiatric effects [109].

2.2.3. Irreversible Acetylcholinesterase Inhibitors as Therapeutic Agents

OPs, except their use as toxic compounds, have been applied in ophthalmology as therapeutic agents in the treatment of chronic glaucoma, an eye disease in which the optic nerve is damaged in a characteristic pattern. The disease is associated with increased fluid pressure in the eye, and can permanently damage vision in the affected eye(s) and lead to blindness if left untreated [110]. These medical useful OPs include diisopropyl fluorophosphate and echothiophate.

Diisopropyl fluorophosphate (DFP, DIFP, diisopropyl phosphorofluoridate) (Fig. **14**14) is a parasympathomimetic drug, irreversible anti-cholinesterase, and has been used locally in the oily eye drops form as a miotic agent in the glaucoma treatment. It is known as fluostigmine and dyflos in such uses. It exerts ocular side effects mainly associated with its AChE inhibitory properties, and ability to induce delayed peripheral neuropathy [67, 111].

Fig. (14)
Pharmacologically important OPs.

Echothiophate (phospholine) (Fig. **14**14) is a parasympathomimetic phosphorothioate, irreversible AChE inhibitor. It is used as an ocular antihypertensive in the treatment of chronic glaucoma and, in some cases, accommodative esotropia. Its application is local (eye drops), and the effects can last a week or more. The drug is available under several trade names such as phospholine iodide. Adverse effects include muscle spasm and other systemic effects [112].

OP compounds may be used in the therapy of neurological damages such as AD and Parkinson's disease. The example is trichlorfon (metrifonate) (Fig. **14**14) that used to be applied as a pesticide, and has medicine implementation analogous to the carbamate rivastigmine (described above) [113].

The described reversible and irreversible AChE inhibitors are summarized in Table **22**.

Table 2
Commonly used Reversible and Irreversible AChE Inhibitors and their Application

2.2.4. Nonspecific Toxic Effects of Organophosphates

The primary target of OP action is AChE, and the main mechanism of toxicity in acute OP exposure involves the specific irreversible inhibition of this enzyme activity in the nervous system and blood, manifesting as a cholinergic crisis with excessive glandular secretions and weakness, miosis and fasciculation of muscle, which may lead to death [106, 114, 115]. Additionally, many studies suggest that both acute and chronic intoxication disturb the redox processes changing the activities of antioxidative enzymes and causing enhancement of lipid peroxidation in many organs, and there is little correlation between organ damage and the degree of OP induced AChE inhibition [116-118]. Indeed, in acute, and rather subchronic or chronic OP exposition, induction of oxidative stress has been reported as the main mechanism of its toxicity [119]. Oxidative stress is defined as an imbalance between the production of free radicals – reactive oxygen species (ROS) and the antioxidant defense system – enzymatic and non-enzymatic. The ROS may be generated as the result of the metabolism of OPs by cytochrome P450s, monooxygenases that catalyze oxidation by addition of one atom of molecular oxygen into the substrate (OP) by electron transport pathway [120]. This disorder is manifested by changes in the activity of antioxidative enzymes (catalase, superoxide dismutase, glutathione peroxidase, glutathione reductase), increased malondialdehyde concentration and/or altered levels of non-enzymatic antioxidants (reduced glutathione, vitamin C, vitamin E, beta-carotene), as oxidative stress parameters and the marker of ROS increased level and lipid peroxidation [99, 121, 122]. There is some evidence that OPs may affect liver, kidney, muscles, immune, and hematological system, causing many human body disorders [123-125]. Also, some findings indicate oxidative stress as an important pathomechanism of neurological disorders such as AD and Parkinson's disease, as well as of cardiovascular diseases [122, 126, 127].

Furthermore, OP induced ROS attack lipids, proteins and DNA, causing oxidation and membrane damage, enzyme inactivation, DNA damage and cell death [128-130]. The highly reactive free radicals attack DNA resulting in single and double strand breaks, as well as oxidative damage to sugar and base residues that can later be converted to strand breaks [131]. On the other hand, phosphorus moiety in the OPs appears to be a good substrate for nucleophilic attack leading to phosphorylation of DNA which is an instance of DNA damage [132]. Some reported studies indicate the increase in chromosomal aberrations (CA), micronuclei (MN) and sister chromatid exchanges (SCE), as the markers of cytogenetic damage, in cultured lymphocytes isolated from peripheral blood taken from exposed individuals. Thus, cytogenetic damage in circulating lymphocytes has been widely used as a biomarker of exposure and effects of pesticides [133, 134]. It has been reported that AChE non-inhibiting OP decomposition products exert stronger genotoxic potency compared to the parent compound [99], suggesting that the risk of genotoxicity from some insecticides might be appreciably greater than that predicted from standard toxicity tests [135]. Moreover, DNA damage leads to genomic instability that may result in mutagenesis and carcinogenesis [136]. Some epidemiological studies demonstrate cancer risk due to pesticides exposure [137-139], while The United States Environmental Protection Agency lists parathion as a possible human carcinogen [140].

Go to:

DETOXIFICATION OF ACETYLCHOLINESTERASE INHIBITORS 3.

3.1. Pharmacological Treatment of Organophosphates Induced Intoxication

The mechanism of OP insecticides action is based on the irreversible inhibition of AChE in an insect body, resulting in the disrupted neuronal transmission and the consequent death. However, the OPs are not selective for insect species, but they have the same mechanism of action for the warm-blooded organisms including humans that may be also intoxicated. Actually, OPs irreversibly inhibit human AChE in Ser203 leading to the cholinergic crisis which manifests as the muscarinic (lacrimation, salivation, miosis), nicotinic (neuromuscular blockade) or central (breath depression) symptoms, and the organism death in the case of untreated OP intoxication [52]. OP poisoning can be treated non-pharmacologically and pharmacologically [141]. The non-pharmacologic treatment includes resuscitation, oxygen supply or decontamination depending on the OP entrance to the human body (*e.g.* skin, eye, gastric decontamination) [142], whereas the pharmacologic treatment is based on the administration of symptomatic and causal drugs. Parasympatolytics (usually atropine, Fig. **15**), that reduce the effects of the accumulated ACh on the cholinergic receptors [143], and anticonvulsives (usually diazepam, Fig. **15**), diminishing neuromuscular seizures [144], are used as the symptomatic treatment. The causal treatment comprises AChE reactivators that, unlike the symptomatic drugs, regenerate the enzyme native function by cleaving OP moiety from AChE serine active site. The mechanism of AChE reactivation is based on the nucleophilic attack of the reactivator hydroxyiminomethyl (oxime) moiety towards the OP moiety of the phosphorylated AChE. The covalent bond between OP and AChE serine is cleaved, reactivator-OP complex (phosphorylated reactivator) is formed, and the enzyme is liberated (Fig. **16**) [145, 146]. However, the inactivated phosphorylated enzyme can be dealkylated (Fig. **6**), and such aged OP-AChE complex cannot be reactivated by the oxime reactivators. Therefore, the oxime reactivators should be administered rapidly after the OP poisoning [147].

Fig. (15)
Frequently used drugs for symptomatic treatment of OP intoxication.

Fig. (16)
Regeneration of inhibited AChE activity by oxime reactivators.

The commercially available oxime reactivators - pralidoxime, methoxime, trimedoxime, obidoxime, asoxime (Fig. **17**) were developed in 1950s, and primarily intended to reduce the nerve agents intoxication [148]. Additionally, some of them exerted good effects in the restoration of inhibited cholinesterases by OP insecticides as well [149]. Although pralidoxime was the first synthesized and most common used causal drug, its capability to regenerate the inhibited enzyme activity is not satisfactory. On the contrary, bisquaternary oximes, trimedoxime and obidoxime exhibited very good abilities in the treatment of OP insecticides poisoning, whereas asoxime was found to be effective for nerve agent induced intoxication and without the meaningful reactivation of the inhibited AChE by OP insecticides. Moreover, obidoxime, combined with atropine and diazepam, has demonstrated positive results in the clinical trials [150, 151]. Furthermore, among 300 synthesized and evaluated oxime reactivators, some novel compounds (*e.g.* K027, BT-07-4M, TMB-4, BT-08) possess, related to the commercially available reactivators, both better reactivation capabilities against different OP insecticides and significantly decreased toxicity tested using *in vitro* and *in vivo* animal models [152-154].

Fig. (17)
Commercially available oxime reactivators of AChE activity.

3.2. Detoxification of Organophosphorus and Carbamate Insecticides Through Enzymatic Hydrolysis

Carbamates and OPs are apolar compounds accumulating in fatty tissues, and can be eliminated by their conversion to water soluble compounds. The most effective way to increase the water solubility of these toxic compounds is hydrolysis to much more water soluble metabolites that may be removed in urine. Although these insecticides are able to hydrolyze spontaneously especially at high pH, the main route of their detoxification is enzymatic degradation by hydrolases generating less toxic metabolites.

Carbamates are most effectively decomposed by carboxylesterases (CESs), the esterases capable to hydrolyze carboxyl esters [155]. The mechanism of the CESs catalyzed hydrolysis of carboxyl esters (Fig. **18**18) consists in the reversible acylation of a serine residue in the active centre of the protein, releasing the covalently acylated enzyme and the alcohol moiety of the carboxyl ester. Subsequently, the acylated intermediate is decomposed by nucleophilic water attack to the corresponding carboxylic acid and the free active CES participating in the new catalytic cycle. Highest CESs concentrations have been found in serum and liver of mammals [156].

Fig. (18)
Mechanism of CESs catalyzed hydrolysis of carboxyl esters.

Since the carbamates are structurally similar to carboxyl esters, these insecticides are susceptive to CESs catalyzed hydrolysis. The mechanism of carbamates induced inhibition of CESs is similar to the mechanism of hydrolysis of the enzyme natural substrates. The additional step is the final rapid degradation of carbamic acid to carbon dioxide and the corresponding amine (Fig. **19**19).

Fig. (19)
CESs catalyzed hydrolysis of carbamate insecticides.

Moreover, oxidized metabolites of the parent carbamate insecticides can also be decomposed by CESs due to the intact carbamic ester bond [71]. The metabolism of carbamates depends on their chemical structure and animal species. So, the hydrolysis of carbaryl in rabbit serum is significantly more efficient than chicken and human serum activity. Also, CESs with the ability to hydrolyze carbamates have been found in some bacteria (*Blastobacter, Arthrobacter, Pseudomonas, Achromobacter, Micrococcus)* [71, 157]. Additionally, some findings have demonstrated the capacity of serum albumin to decompose *N*-methylcarbamates and some OPs, and its hydrolyzing potency differs among species. Generally, mammals exert higher hydrolyzing activity than birds [71, 158, 159].

OPs are detoxified through oxidation and hydrolysis. The enzymes included in the hydrolysis of these toxic insecticides are CESs and phosphotriesterases (PTEs). Actually, in mammals (especially in liver and serum) there is a pool of CESs of unknown physiological role, named B-

esterases that both hydrolyze carboxyl esters and being inhibited by OPs. Different from A-esterases being capable to hydrolyze carboxyl esters but not inhibited by OPs, B-esterases may be involved in the detoxification of OPs, and carbamates as well [160]. While OP and carbamate insecticides exhibit major toxic effects through phosphorylation and carbamylation, respectively, of AChE and neuropathy target esterase inactivating these CESs, the inhibition of B-esterases is not associated with evident toxic effects. The mechanism of B-esterases inhibition by OPs is analogous to that induced by carbamates (Fig. **19**19). The difference is in the final step; the phosphorylated enzyme cannot be reactivated by water, and cannot release the free active enzyme (Fig. **20**20). In this detoxification system that removes the insecticides from the media, each molecule of CESs scavenges at least one molecule of the toxic compound before this reaches targets in the nervous system [71, 161].

Fig. (20)
Inhibition of B-esterases by OPs.

However, much more efficient route of OPs detoxification is hydrolysis by PTEs, esterases of an unknown physiological role. The mechanism of PTEs action is based on the bond cleavage between the phosphorous atom and the leaving group (–X) of OPs (Fig. **21**21). The resulting metabolites are less toxic and more polar than the parent OP, and therefore do not accumulate in fatty tissues and are eliminated in urine. Unlike OPs detoxification by CESs where one molecule of CESs scavenges and removes one molecule of OP, one molecule of PTE is able to degrade plenty of OP molecules, which makes this detoxification route more sovereign [162]. PTEs have been found in various biological tissues of mammals, fish, birds, molluscs and bacteria. Although these detoxification enzymes are located in a few tissues of mammals, higher PTEs activity levels have been detected in serum and liver [158, 163].

Fig. (21)
OPs hydrolysis catalyzed by known PTEs: DFPase and paraoxonase.

Some studies indicate correlation between PTEs presence in some species and their susceptibility to toxic effects of OPs. So, insects and birds lack paraoxonase, whereas mammals contain high concentrations of this PTE making them more resistant to paraoxone toxicity [163]. For the strong potency to degrade the toxic insecticides, exogenous purified PTEs exert protective effects against OPs poisoning and can be used as prophylactics and antidotes in the therapeutic treatment of OPs intoxication [164-166]. Besides, these decomposing enzymes exhibit promising applications in other biotechnology fields: bioremediation of wasted materials, biodegradation of insecticide residues, detoxifying warfare arsenals, development of biosensors for OPs [167, 168].

Go to:

FINAL REMARKS 4.

The pharmacological and toxic actions of AChE inhibitors consist in inactivation of the enzyme activity resulting in accumulation of synaptic ACh and consequent enhanced stimulation of postsynaptic cholinergic receptors in the central and/or peripheral nervous systems. According to the mode of action, AChE inhibitors can be divided into two groups: irreversible and reversible**.** Reversible, competitive or noncompetitive, inhibitors (donepezil, rivastigmine,

galantamine) are protagonists in the pharmacotherapy of AD symptoms. Their therapeutic effect is based on maintaining ACh level through slowing down its hydrolysis rate. Hence, these generally well tolerated drugs enhance cholinergic neurotransmission in forebrain regions and compensate for the loss of functioning brain cells. In addition to AD, reversible AChE inhibitors of various chemical structures have noteworthy pharmacological application in the treatment of neurological disorders manifestations such as myasthenia gravis, Lewy bodies and Parkinson's disease dementia, and as prophylactics against nerve agent intoxication as well. On the other hand, carbamate reversible ACh inhibitors also exhibit toxic mode of action, and are used as insecticides, fungicides and herbicides. Different from reversible inhibitors, irreversible AChE inactivators including OPs have toxicological relevance accompanied with ACh accumulation in the synaptic cleft and disrupted neurotransmission. Accordingly, these toxic compounds are applied as nerve gases, and insecticides being most frequently used in last two decades. OPs, as well as carbamate pesticides, can be detoxified through enzymatic hydrolysis in mammals. Carbamates, as structural analogs to carboxyl esters, mainly undergo CESs catalyzed degradation, whereas the most efficient detoxification route of OPs is the hydrolysis catalyzed by different PTEs. Besides, OPs induced poisoning can be pharmacologically treated by simptomatic (atropine, diazepam), and causal drugs such as oxime reactivators. Except their use as toxic compounds, some OPs demonstrate pharmacological significance. For instance, diisopropyl fluorophosphate and echothiophate have been administered in the treatment of chronic glaucoma. Although the use of AChE inhibitors relies on the interaction with AChE as their primary target, a number of cholinesterase inhibitors such as OPs have additional sites of action that may have toxicological relevance. Actually, acute, and rather subchronic or chronic OP exposition results in elevated ROS level attacking lipids, proteins, DNA, and consequently causes membrane damage, enzyme inactivation, DNA damage and cell death.

Go to:

ACKNOWLEDGEMENTS

This work was financially supported by by Ministry of Education, Science and Technological Development of the Republic of Serbia (Project No. 172023).

Submission
No 113

INQUIRY INTO CROSS CITY TUNNEL

Organisation:	Lane Cove Tunnel Action Group Inc
Name:	Dr Ray Kearney
Position:	Chairman
Telephone:	9351 3590
Date Received:	25/05/2006

Theme:

Summary

LANE COVE TUNNEL Action Group

164 LONGUEVILLE ROAD LANE COVE NSW 2066
PHONE: 9427 0130 FAX: 9427 6076

LANE COVE TUNNEL ACTION GROUP INC.
ABN 89 787 371 833

The Director
Joint Select Committee on the Cross City Tunnel
Parliament House
Macquarie St
Sydney 2000

Dr Ray Kearney, Chairman,
Ms June Hefferan, Deputy Chair
Lane Cove Tunnel Action Group Inc
Phone: 93513590 (w)

24 May 2006

Dear Ms Simpson,

RE: Submission to the NSW Parliamentary CCT - LCT Inquiry

The Lane Cove Tunnel Action Group Inc (LCTAG), as a member of the coalition of Groups Against Stack Pollution (GASP), wishes to make a submission to the Inquiry into the Cross City Tunnel (CCT) and Lane Cove Tunnel (LCT) in relation to the following additional prescribed Terms of Reference:

Terms of Reference of the Inquiry into the Lane Cove Tunnel

g) the role of Government agencies in relation to the negotiation of the contract with the Lane Cove Tunnel Consortium,

h) the extent to which the substance of the Lane Cove Tunnel contract was determined through community consultation processes,

i) the methodology used by the Roads and Traffic Authority for tendering and contract negotiations in connection with the Lane Cove Tunnel, and

j) any other related matters.

We also wish to advise that there is inevitably some overlap in our present comments with those regarding the LCT Project reported in our earlier Submission, dated 18 January, 2006, to the Committee.

Declaration

This Response has been undertaken with the best of our ability and knowledge, based on materials, documents available and current information, as well as more than 15 years involvement with the LCT from its earliest beginnings.

Its presentation is true and does not, by its presentation of information or omission of information, materially mislead or intend to materially mislead.

Ray Kearney
Chairman

June Hefferan
Deputy Chair

Lane Cove Tunnel Action Group Inc.

LCTAG Inc

An Objective of LCTAG

A cornerstone of the Lane Cove Tunnel Action Group's (LCTAG) mission is to achieve the construction of a twin three-lane 3.7km-continuous tunnel with the installation and operation of air-pollution treatment systems to reduce adverse health impacts. This objective was based upon independent expert advice from consultants in tunnelling design and construction as well as from air-filtration consultants at both national and international levels.

Our commitment to this mission is also based upon the inescapable fact that vehicle emissions are injurious to the health of everyone exposed to them. "At risk" persons such as children, asthmatics, the elderly and pregnant women are especially affected by both short and cumulative exposures, even below prescribed National standards.

The Lane Cove Tunnel Action Group Inc (LCTAG)

LCTAG is a coalition of 15 groups drawn from the residential, commercial and industrial sectors of Lane Cove. The Action Group was formed over ten years ago to seek the construction of a 3.7km, bore-driven, twin three-lane tunnel with the installation of air-cleaning technologies (electrostatic precipitators and activated carbon beds) that also negate the need for unsightly ventilation stacks.

It was indeed the LCTAG who **proposed**:

- The continuous long bore-driven by-pass tunnel as the most acceptable alternative to RTA's proposal to widen Epping Road or to construct a short 'cut and cover' tunnel.
- The route of the present LCT.
- The most suitable and recommended site for the western tunnel exit/entrance or portal being on the RTA land at the intersection of Mowbray Road and Epping Road. However, to thwart the proposal, the RTA sold its land and in arrangements with the City of Willoughby Council had the site re-zoned to 'residential' to make way for a developer to build townhouses on the site. The naivety of the RTA was realized when the LCTAG tunnel proposal was independently published, by us, in the *North Shore Times* that forced the former Roads Minister Carl Scully to finally accept the LCTAG proposal. Today, the RTA is left with the only option to carve into the middle of Epping Road to build the western portal. By doing so the RTA had to compromise a needed 3-lane entry with only 2-lanes as they had already sold their land for townhouses. Thus, the RTA today has compromised surface traffic on Epping road by destroying more lanes from the surface road. Therein is the truth to the background of why the east-bound tunnel carriage-way begins with a compromised 2-lane entry, rather than the 3-lane entry, originally recommended by LCTAG on expert engineering advice.

The LCTAG is also part of a coalition with the M5-East Residents Against Polluting Stacks (RAPS) as well as those affected by the Cross City Tunnel i.e., Sydneysiders Against Polluting Stacks (SAPS) and the Cross City Tunnel Action Group (CCTAG). This coalition of concerned communities continues to campaign under the name of Groups Against Stack Pollution (GASP).

1. Term of Reference g)

g) The role of Government agencies in relation to the negotiation of the contract with the Lane Cove Tunnel Consortium.

1.1 A 'Structure of Harm' by Government and Corporate Connivance

That corporate wealth buys broad influence in law and public policy is well documented and widely acknowledged.

Occupational and environmental diseases are often viewed as isolated and unique failures of science, the government or industry to protect the best interest of the public. However, they are frequently an outcome of a pervasive system of corporate priority setting, decision making, and influence with political and bureaucratic stakeholders. This 'structure of harm' is based on corporations compelled to maximize profitability while costs to society such as from pollution are largely ignored.

The system in NSW, revealed recently in 'privileged' documents released in NSW Parliament, produces disease because political, economic, regulatory and ideological norms prioritize values of wealth and profit over human health and environmental well-being. In other words, the current economic and political system in NSW privileges corporate actors and tends to provide incentives for the production of injury and disease rather than its prevention.

The tabled documents revealed that the NSW Government and certain of its bureaucracies appear to have forfeited a legislative and constitutional role as servants of the public and have aligned themselves with corporate stakeholders in the design, construction and operation of traffic tunnels in Sydney. What is now clear is the social and environmental costs of Sydney's long road tunnels have been ignored by externalizing them, or shifting costs to the government (taxpayers), residents, neighbours, motorists and workers.

Even more deplorable is that the documents disclose the RTA has agreed to indemnify the tunnel companies for costs, charges and expenses or for claims or losses should a court find that environmental assessment or determination of the 'Tunnel' including the Ministers Condition of Approval fails to comply with the Law or is invalid in any respect. The RTA has indemnified the respective company in relation to any investigation or 'legal challenge'. It is noteworthy that in September 2004, the NSW Government closed their air-quality monitoring station near the Cross City Tunnel (CCT) thereby removing evidence of local high pollution levels and thwarting potential litigation by residents affected by pollution from the toxic CCT exhausts together with that generated by gridlocked surface traffic. The NSW Government's reason that it was unaffordable to maintain the monitor is hardly credible when in June, 2002 the RTA paid $9,110,375 to acquire land with a market value of $4,520,250 to build the eastern stack for the Lane Cove Tunnel.

The 'secret' Deeds of Contract appear to protect the companies from paying 'restitution' of the injured through the payment of unenforceable compensatory fines, capped by the RTA for the Cross City Motorway Company at $5million, rather than criminal penalties. The failure to impose fines is the experience with the M5 East tunnel debacle where numerous breaches of the Ministers Conditions of Approval are on record. Thus, the costs never approach the economic advantage that accrues to the companies that perpetuate these injuries and escape liability. In other words the RTA has made it cheaper for the companies not to install proper filtration and thereby inflict sickness and potential death on the community exposed to toxic stack pollution.

It seems reckless to discharge additional toxic hazards wilfully into Sydney's air-shed that is already exceeding National Standards for harmful fine particles. The interlinked RTA-Corporate goal of profit maximization exceeds any future compensation cost. Twice as many people die from exposure to vehicle exhaust in Sydney than from road accidents. Total health impacts cost $2-3billion annually for Sydney alone.

In shoring up the profits of its corporate co-partners, the RTA has over the past few years embarked on an utterly misleading campaign to discredit tunnel filtration. Some of its strategies have included:

- Former Roads Minister Carl Scully reinforced the RTA propaganda by his refrain that "Tunnel filtration is unproven technology and is only a high-tech placebo". This emotive claim was demonstrably false.
- The RTA, with government and ministerial fanfare, announced two 'filtration trials' to appease community anger. These trials would have been too small to enable any conclusions and appear to have been abandoned.
- A comparative analysis of tabled documents shows hand-written notes taken at the time by one of the RTA delegates who visited Japan in September/October, 2003 to inspect tunnel filtration bear little relationship to the formal RTA Report on Japan's Tunnel Filtration. The final report downplayed significantly both the extent and the effectiveness of filtration in Japan.
- RTA and NSW Health rejected the findings of three independent consultants commissioned by Lane Cove Council. The consultants recommended unanimously that the negative findings from NSW Health's Study of Residents Affected by the M5 East Stack be rejected on several grounds including a flawed methodology that skewed the results to a 'no risk to health' conclusion. This did not occur, even after the Department of Health discovered that significant portal emissions were occurring during the time of the survey. These would have caused a skewing of the results as the people in the survey were in fact receiving a considerably lower pollution load at that time than in normal circumstances.
- It appears that the proportional increase in privileged documents in a recent Parliamentary Call for Papers is a reflection of the bureaucratic desire to keep their 'business' secret. It was a 'de-classified' report that disclosed in 2004 that medical specialists concluded from the M5 Phase1 health study that there was *prima facie* evidence that illnesses reported by local residents were causally related to stack emissions. Shocked by this unplanned disclosure, NSW Health designed a Phase 2 study, proven so defective and methodologically flawed, that the predictable findings would show no causal relationship.

Lane Cove Tunnel Action Group (LCTAG) believes there is not only an obligation of 'due diligence' by the Regulatory Authorities (RTA, DEC, Health and DoP) but also on the respective tunnel consortia to implement proven measures to clean and detoxify the polluted tunnel air-stream where the poisonous components are derived almost entirely from the combustion of fossil fuels, mainly petrol and diesel. Such measures would be consistent with the Precautionary Principles.

LCTAG also believes that to date, the NSW RTA and the respective tunnel corporate stakeholders, have failed to exercise such care, skill and foresight that would be expected of a reasonable corporation and this failure helps remove a defence of 'due diligence' by ignoring such facts. Indeed, the failure of the RTA and the respective companies could be interpreted now as a wilful and pre-meditated decision not to adopt preventive or precautionary measures. Such a decision implies a deliberate intention to discharge untreated toxic waste, knowing it has the potential to harm or be likely to harm the environment, including those 'most at risk' in a community who are already described in documents, known to the RTA and to the Consortia as the ***"most affected receptors."***

The RTA, in particular, seem not to exercise 'due diligence' by knowingly and negligently intending to discharge higher levels of toxic waste from the M5 East, CCT and the re-designed Lane Cove Tunnel (LCT) in a manner likely to cause harm. To date, LCTAG alleges that neither the RTA nor the respective tunnel consortia (M5 East, CCT and LCT) has volunteered the truth about traffic volumes or the real pollution levels. LCTAG also understands that a defence of 'due diligence' is established if a company commissions the offence due to causes over which they had no control; and that they took reasonable precautions and exercised due diligence to prevent the offence.

Put squarely, LCTAG believes, the government agencies in forfeiting their public service duties to the electorate by aligning themselves with corporate stakeholders have betrayed the communities whom they are meant to serve.

1.2 RTA Rejected Tenders for LC Tunnel Filtration

The most recent tabled documents in 2006 for which privilege was lifted by the Independent Legal Arbiter on grounds that they are of public interest have disclosed, again, a litany of scandals perpetrated mainly by the NSW RTA.

Documents confirm that at the time when tenders were called for the LCT project, various consortia submitted two different types of tenders as is conventional and legal practice. A 'compliant' tender is a proposal that meets the Ministers Conditions of Approval (MCoA) for the project. The other is an 'alternative' or 'add-on' proposal which not only fulfills the MCoA but incorporates additions or modifications e.g., to enhance design outcomes and cost effectiveness of the project.

It is significant that a number of alternative bids were submitted. These incorporated technology and design changes which the respective bidders claimed would improve air quality - both in the tunnel and in the external atmosphere. However, without proper consideration, the RTA rejected all 'add-on' tenders that incorporated filtration and air-cleaning technology. The legality of such alleged conduct by the RTA should be tested formally.

In December 2003, the RTA signed the Project Deed with the successful bidder. The RTA, rejected 'add-on' proposals for superior treatment of particulate and gaseous emissions in the LCT. Privileged papers disclose one such proposal guaranteed the treatment system of the tunnel pollution *"would deliver significant environmental benefits"* and tabulated the following key benefits:

- reduced emission of particulates, CO, and NOx
- net reduction in emissions of CO_2
- enhanced dispersion of exhaust air
- improved external air quality
- increased power supply reliability provided by 90MW of embedded generation capacity
- net revenue gain from generated power
- reduction in greenhouse gas production in NSW attributable to tunnel operations
- environmental benefit from carbon credits

The tenderer indicated that changes to the Project Deed would apply. However, the RTA rejected all such 'add-ons' without any appraisal.

1.3 RTA suppression of Filtration Facts

The RTA was already fully aware filtration technology was proven, effective and efficient, before the contract with the successful bidder – the Lane Cove Tunnel Company (LCTC) – was signed in December, 2003. Their knowledge was confirmed both from their visit to Japan in September/October, 2003 and from an RTA-suppressed report by a consultant, whom they commissioned in early, 2003. However, despite all such evidence, the RTA maintained a negative and obstructive mindset regarding tunnel filtration technology.

Suppression of the truth by the RTA about tunnel filtration first began when the RTA thwarted the leading Japanese manufacturer with over 25 years of experience with in-tunnel filtration systems - Matsushita Co. Ltd - from attending the RTA-managed 'International Workshop on Tunnel Ventilation' held in Sydney, 7-11 June, 2000. Matsushita courteously responded:

> *"...we cannot attend this time because of that too short a notice and we cannot prepare for the presentation. If possible, please give us another chance to make presentation for Tunnel Ventilation System in Japan"* (Note: letter dated 6 June, 2000).

The RTA never gave Matsushita the chance to demonstrate its expertise and long experience with EP technology until October, 2003 when an RTA delegation, including Director of RTA Communications - Paul Willoughby - was sent to Japan, 30 September-10 October, by former Road's Minister Carl Scully, at the request of Lane Cove Council.

Soon after the visit, one delegate - Garry Humphrey, RTA General Manager of Motorway Services - presented a conference paper in Durban, South Africa, 19-25 October, 2003. The following is a startling disclosure in his paper about Road Tunnel Operations (PIARC website).

> *"I was in Japan the week before last looking at tunnels on a tour organised by Mr Mizutani. Japan has some excellent cost effective longitudinal ventilation systems in long mountain tunnels employing electrostatic precipitators."*

Subsequently, in April, 2004, former Road's Minister Carl Scully announced a 'filtration trial', coinciding with the release of a misleading RTA Report about Japan's numerous filtered traffic tunnels. At the same time, the RTA delayed the release of the separate independent report on international developments in filtration technology carried out by a consultant as part of the approval conditions for the M5 tunnel. Among its conclusions, the independent report states: *"significant progress has been made in the field of emission treatment technology, and that mature or established technologies are now available to remove suspended particles, nitrogen dioxide, some portion of other oxides of nitrogen, and hydrocarbon vapours from road tunnel exhaust air."* (Child & Associates)

Meanwhile, the RTA has placed an embargo on the consultant from disclosing, at international conferences, the truth about proven overseas tunnel filtration technologies.

1.4 Cost and Cover-up

Among the tabled RTA documents for which privilege was lifted, papers disclose evidence the RTA also grossly inflated estimates for the cost of tunnel filtration systems. Cost estimates in the privileged papers are less than an inflated $75 million suggested by the RTA. The Federal Government is prepared to contribute $10 million to filter the LCT. It is noteworthy that the cost estimates for the health impacts predicted from expected stack pollutants to which Lane Cove residents will be exposed is at least $5 million annually.

'Privileged' tabled papers disclose that a reason why the RTA refused the installation of filtration systems in the Cross City Tunnel was: *"The reputation of both the Government and the RTA in relation to delivery of private sector projects may be significantly damaged if a requirement to install filtration is introduced at this late stage."*

1.5 Tabled Documents

These documents reveal continued tension between the RTA and agencies such as EPA and (then) PlanningNSW. Issues of air quality, ventilation design, noise management, health risk and risk of cancer are raised. Each time the RTA appears to obfuscate or reject the concern or argument. At times, RTA simply does not respond to the correspondence.

The documents show systematic shifting of responsibility and blame between the different departments, avoidance to own up, let alone address, fundamental errors and deficiencies, manipulation of data, ignoring of inconvenient scientific advice and deliberate misrepresentation to Parliament, the public and the EPA Board. LCTAG Inc believes the internal papers reveal widespread negligence in dealing with high levels of toxic exhaust pollution.

Documents show that the departments know the standards and conditions being used to regulate tunnels are inadequate, and the information used to approve projects has been manipulated. While the different departments argue within and among themselves about what to do, they are very concerned about admitting having made a mistake, and above all about having a "consistent" and "strategic" approach. Admitting, as well, that once a tunnel has been approved, there is no scope to change the standards, the recurring refrain is that they are awaiting new national or international standards (that can't be applied to existing projects). The EPA seems to concede in the papers that it is better to let the community take on the rogue RTA than for the EPA!

Close reading of the documents reveals an RTA bureaucracy seemingly drunk with power. Publicly they cite the EPA, NSW Health and the Department as approval bodies whose advice and technical expertise should reassure the community that health, safety, environmental and planning issues are stringently examined and forcefully applied. Privately, the truth is that these agencies are ignored where it does not suit the RTA and crushed when they dare to protest. The veracity of our claims can be seen in the summary of documents tables in October 2003 that is attached as Appendix 1.

LCTAG asserts that it is the responsibility of Government to legislate to curb the RTA's power over major infrastructure projects. EPA and NSW Health should have real power to act independently and responsibly. They should have a legislative responsibility to do so, even when their findings might be unpalatable to the RTA. Their authority in matters of air quality and community health should not be over-ridden at the whim of the RTA.

1.6 Bureaucracy's Answer to Cancer - Blow it in the Wind!

The NSW Government has given planning approval to discharge from the 3.7 km Lane Cove twin tunnel, highly toxic emissions, untreated, via two proposed stacks in residential/ commercial areas. Crucial lessons have not been learnt from the M5 East tunnel debacle, or from three separate Parliamentary Inquiries into the M5East Tunnel Ventilation Stack.

Noxious pollutants from the proposed stacks will impact adversely not only upon local amenity and health but also upon property values (up to 20-25%) of the "worst affected receptors" as disclosed in documents tabled by Parliamentary Order. The severity of impact on health will depend also on conditions such as wind direction, stagnation and temperature inversions as well as on susceptibility of the exposed population. People suffering from respiratory conditions such as asthma, both young and old, are particularly at risk.

Stack pollution consisting of dust, gases and smoke, similar to the haze in the M5 East tunnel, affects the lung and respiratory tract but can also be taken up and transported by the bloodstream throughout the body. Through deposition in the environment, vehicle pollutants can also contaminate food and water as well as damage plant and animal life.

The fine particles, formed by condensation of the gases from the combustion of fuel contain known cancer-causing chemicals, as disclosed in the 'Conditions of Approval'. These 'secondary' particles, unlike those swept from the road surface, are mainly soluble in the moisture of the respiratory tract and cause acute respiratory inflammation. When absorbed, they contribute to proven cumulative toxicity.

Recent research involving 500,000 Americans has shown one in five lung cancer deaths is associated with exposure to ultra-fine particles of vehicle exhaust.

A major flaw in the RTA's supervised monitoring of pollution from tunnel stacks is that the fine particulate matter of less than one micrometre ($<PM_1$), representing 90% of particulate pollution from vehicle exhaust is mostly excluded by the measuring devices used, to date, in the monitoring and modelling. By analogy, if a professional fisherman plans to catch harbour prawns then a net of appropriate mesh size is used. In ignorance, the RTA supervise the use of a shark net and what is caught bears no relationship in composition, size and numbers to the professional's catch. The flawed air quality assessment as well as the health-risk analysis of the tunnel emissions have consistently ignored independent professional advice, (e.g., Dr Lidia Morawska (Q'land), air quality expert and adviser to WHO), that PM_{10} measurements, unlike PM_1, provide no information regarding vehicle emissions that constitute the tunnel haze. Thus, standards set for the emissions e.g., of the western stack ($1600\mu g/M^3$/ 30min.) relate only to PM_{10} and grossly under-estimate the actual particulate pollution. Planning NSW has also ignored the fact that the national standards of regional air quality do not apply to point source emissions (stacks) or to tunnels as the standards do not measure the most harmful fine particles in vehicle exhaust.

Last year, in the Upper House, a 'Filtration Bill' was passed on the basis of compelling evidence of proven technology and documented health impacts of particulates. Independent medically qualified politicians contributed to the debate. However, in the Lower House, the NSW Government has consistently used its voting power and untested information to thwart not only such a Bill but to reject the recommendations of three separate M5 East Parliamentary Inquiries calling for the installation of realistic, proven, cost-effective filtration systems.

Unfortunately, the unsuspecting public is largely unaware of the misleading information in the RTA glossy brochures. Not only is what is said often misleading but also, of more importance, is the failure to disclose all the facts. The RTA, with the tacit approval (or at least the silence) of bodies such as NSW Health and the EPA has led people to believe that dispersing these highly toxic pollutants into the wind will somehow render them safe. The fact is that there is no safe level of exposure to fine particles, and allowing the concentrated pollutants from road tunnels merely to blow in the wind is, LCTAG asserts, a dangerous failure to protect public health.

2. Term of Reference h)

h) The extent to which the substance of the Lane Cove Tunnel contract was determined through community consultation processes.

The community consultation process leading to the Lane Cove Tunnel contract superficially appears robust. Between 1986 and 1994 there were five separate processes involving community consultation. The truth is that these were really one long war of attrition as the community battled against the RTA plan to turn Epping Rd through Lane Cove into a 100kph freeway with grade separated intersections. The plan was rejected by the community for many reasons, not the least of which is that Epping Rd is a residential street as well as an arterial road, with many driveways opening on to it. It would have been a road safety nightmare. The path to the long bypass tunnel that we have now was littered with RTA obstacles – a series of short tunnel proposals that would all have widened parts of Epping Rd to ten or twelve lanes - in a residential area.

The bore driven tunnel from the Lane Cove River to the Gore Hill Freeway was proposed and promoted by LCTAG from the end of 1995. A modified form of this concept was essentially the basis of the 1998 EIS.

However, there is no evidence that community consultation had any significant role in determining the contract with the Lane Cove Tunnel consortium.

2.1 EIS Community Consultation

The project itself is supposed to have arisen from the EIS process where community consultation was conducted through a series of Focus Groups. Unfortunately, it appeared that the RTA entered this consultation with a pre-determined outcome in mind. LCTAG representatives participated in three Focus Groups – *Air Quality; Traffic, Transport, & Urban Design;* and *Pedestrians & Public Transport.* Problems with the process included:

- The RTA attempted to stifle all discussion about filtration technology and no evidence of proper investigation was ever presented.
- RTA consistently rejected LCTAG's proposal for a three lane tunnel. If the Tunnel Consortium's traffic predictions are anywhere near correct, it seems like three lanes would have been more appropriate.
- RTA traffic numbers were clearly underestimated and it took months of community pressure to have new traffic counts done. These showed RTA's figures for 1998 traffic to be more than 20,000 vehicles per day short of the correct figure.
- The underestimation continued and the RTA's 2006 traffic projections as contained in the EIS were exceeded in 2003. As a consequence polluting emissions must have been underestimated in the EIS.
- Community representatives argued that the Falcon St ramps should have been built as part of the Gore Hill Freeway project and should not be tolled. RTA's rejection of this community recommendation is only now being understood by the public at large. The 200m ramps have recently been described as the "most expensive" areas of road in the world.
- Late in the process RTA presented a plan to widen Epping Rd from Pacific Highway to Centennial Ave. Community members asked for traffic modelling to compare the traffic effects on local roads of the new proposal with the original concept. The modelling was never presented and in fact the Traffic, Transport and Urban Design group never met again after this request was made.
- Some other Government agencies were supposed to be represented. They did not attend regularly but this may have been due to the fact that they seemed to have no role other than to deflect community questions from the RTA.

When the EIS was published very little time was allowed for public comment. The ensuing Representations Report (2002) made scant attempt to address community concerns and became a

vehicle to reinforce RTA plans while including changes suited to the RTA view. The process does not allow any community comment after this stage.

It was not only the community whose views were disregarded and rejected. The NSW EPA had serious concerns about air quality and noise that echoed the views community members were putting. The RTA chose to treat the EPA's submission on the EIS as correspondence partly, LCTAG believes, to avoid the submission and EPA concerns being made public through publication in the Representation Report. EPA complained that the Representations Report did not address the majority of environmental issues raised by them. EPA was particularly concerned about air quality after the tunnel opened – citing stack emission concentrations and load limits and stack exhaust velocities relevant to dispersal of pollutants.

In a 2002 submission to the RTA's General Manager, Environment and Community Policy Branch, one Michael Najem (Manager Environment and Property) dismissed all the EPA's concerns. He argued that since *"there is no statutory provision under Part 5 of the EP&A Act which makes it necessary for the EPA to be satisfied that all environmental issues (relevant to its function) have been resolved before the RTA can seek the Minister's approval for the project"* the EPA should *"leave these issues (including any suggestion that the EIS may have inadequately dealt with the issues) for consideration by Planning NSW and the Minister."* (Document attached at Appendix 2)

One wonders what role the RTA sees for the EPA when they tout them as an approval body and treat them with such contempt internally.

2.2 Flaws in the EIS Air Quality Assessment

As a community we found many flaws in the EIS air quality assessment. None was addressed to our satisfaction in the Representations Report and, of course, we could not pursue them further at that time. Among the most serious were:

- Seaton (1996) states that the relative size of particles from combustion of fuel is within two peaks i.e., 0.03μm and 0.1μm. Neither of these particle sizes (by mass or by number) is measured in the EIS Air Quality surveys.
- The invalid PM_{10} data for measurements of traffic emissions implies the health risk "assessment" is also grossly under-estimated and flawed.
- The EIS Report fails to reveal the health significance of particle numbers. For example:1 x 10^6 particles, PM 0.1μm, equivalent in volume that have a surface area 100-fold greater than one particle PM 10μm. This surface area is further under-estimated because the fine char particles are highly vesiculated or perforated like coral.
- Research shows that the 75% of the toxins, including carcinogens among the polyaromatic hydrocarbons, are carried on respirable particles less than 2.5μm i.e., particles not fully accounted for by the RTA in its PM_{10} air quality data.
- Unlike overseas countries, Australia only has a standard for PM_{10} not for $PM_{2.5}$ nor PM_1. It is positively misleading of the RTA to imply PM_{10} includes $PM_{2.5}$ and PM_1.
- It seems erroneous and devious of the RTA to state "bearing in mind $PM_{2.5}$ particles are a sub-component of PM_{10} particles, this is a more stringent standard than the US EPA's standard for $PM_{2.5}$ particles, which is set at 65μg/M^3." (EIS Air Quality and Health Risk, p. 8). In fact, US $PM_{2.5}$ standard is now set at 20μg/M^3.
- Despite the fact that the standards in the National Environmental Protection Measures (NEPM) do **not** apply to a point source emission, but to a regional airshed. The RTA has ignored the specific NEPM guidelines and applied an inappropriate PM_{10} instrument for measuring emission pollution from stacks. Community advice was ignored.
- The RTA seems to view air quality goals as a licence to pollute. The standard for PM_{10} is 50μg/M^3 average over 24 hours. But the EIS treats 48 or 49 as acceptable. This is the problem with the idea of operating a standard. We should say that 50 is the upper limit, therefore our average must be lower, in the range of 10, 20 or so. The RTA has the view it can creep toward 50 and that is acceptable. In contrast, contemporary risk management is about trying to get the levels

as low as possible. We should not work up to a standard, we work down to a risk. That is not what has happened in this process.

- The EIS Report fails to respond to the results of research that confirms there is no safe threshold level of particulate exposure.
- The lack of an identifiable safe threshold level for particulate exposure points to the need to reduce ambient particulate concentrations to as low a level as practical. This means that the RTA needs to acknowledge there are feasible, practicable and warranted measures to reduce toxic emissions in tunnels without the need for stacks.
- Air pollution levels were measured by only two monitors rather than an air quality network. The choice seems not to have followed a standard protocol regarding the selection of stations, correlation between stations and missing values e.g., topography.
- The change in units of PM_{10} from $\mu g/M^3$ to grams/second could be seen as an attempt by the RTA to obscure or suppress the fact there are major exceedances in PM_{10}. (See Fig. 14, Air Quality & Health Risk). From the data it can be calculated that in 12 hours of peak traffic periods more than 40 kgm of toxic particulates are emitted into the atmosphere. It is puzzling at first why east-bound traffic uphill generates less pollution (Fig. 14) than downhill westbound traffic. This is likely to be due to undisclosed cross-ventilation through a link tunnel labelled 'emergency vehicle access' but with fans in the ceiling. Wind direction is not indicated and clearly misleading by omission consistent with RTA practice.
- Monitoring stations should be defined in terms of height and location to avoid errors in the extrapolation of data, as has been the case.
- The terms 'fine' and 'ultrafine' particulates have been used without a precise meaning. Thus whether the monitoring equipment used in the collection of data from two stations is sufficiently accurate needs to be disclosed or subjected to independent evaluation.
- The error of monitoring should have been disclosed. Does the monitor significantly under-estimate the PM_{10} component in the collection sample? What climatic conditions existed at the time of collection e.g., humidity and temperature. An error factor of 20% would indicate PM_{10} $>40\mu g/M^3$ represents an exceedance above the $50\mu g/M^3$ standard.
- How exact are monitors in variable wind conditions in an undulating terrain location?
- How was the data of PM_{10}, for example, obtained for a ventilation stack and especially how were the contributions from the stack and background established from the type of monitors and their locations.
- How long were the monitors in place before readings were taken and what evidence is available that the locations were appropriate? Exceedances are defined in terms of 'ground-level' monitoring, yet some monitors are on the top of tall buildings.
- The dispersion modelling is not transparent and does not provide information about how the data analysis had been undertaken except by the Calpuff model. The data should be audited and analysed by independent experts. The modeling of stack pollution ignores background pollution.
- The RTA fails to acknowledge that carbonaceous soot particles associated with combustion engines, especially diesel, are formed not in the in the engine but instead by gas-to-particle conversion processes form vapour phase particle precursors as the exhaust dilutes and cools in the atmosphere. These processes re extremely non-linear and difficult to simulate in the laboratory.
- Each of the regulatory authorities has failed to adopt the Precautionary Principle as recommended by experts, when there is genuine uncertainty.
- A significant factor in the power of the RTA to ignore health risks is that the NSW Health Department has no legislative or regulatory requirement to participate in the health assessment of exposure to emissions or approval of major developments such as the M5-East, Cross City and Lane Cove Tunnels. *"NSW Health only provides advice to other departments or members of the public, when requested"*. More often it is the concern of an informed community that provides

the catalyst for NSW Health to give advice. We believe the late arrival of NSW Health to such projects places them in the distinctly compromised position of endorsing approvals made by the other Statutory Authorities (e.g. RTA, EPA and DoP) so as to avoid public confrontation with them. LCTAG maintains that NSW Health should be a partner right from the beginning with proper statutory responsibility for health outcomes.

- The RTA and other regulatory authorities fail to acknowledge that it cannot be acceptable to increase health risks to one population (e.g., exposed to emissions from two 'unfiltered stacks') on the grounds that another might correspondingly benefit.
- To date, these Authorities seem to select only facts and arguments that tell in their favour. Coloured words and phrases appeal to the emotions rather than to reason, and sometimes mean nothing at all, e.g., "by world standards our air quality is good" Often their language lacks clarity and precision . They do **not** give the community **all the available facts** to enable them to form an independent opinion based on cold fact, rather than coloured assertions and feelings.

2.3 From Representations Report to Contract Deed

The process does not allow any further community consultation between the EIS and signing of a contract. There appears to be no obligation on the RTA to accept or act on the outcome of the community consultation. No matter how strongly or how frequently an issue is raised by the community (e.g. air quality concerns, tunnel filtration) the RTA can simply ignore it. There is no evidence that the RTA acted upon any issue of substance raised during the EIS consultation, other than to take steps to justify their initial position.

The Lane Cove Tunnel concept was submitted for Ministerial approval with serious and unresolved concerns, not just from the community but also from the EPA. Given these facts, it would be interesting to know what role (then titled) Planning NSW played. Why did they permit the RTA to proceed before the issues were resolved? How did they advise their Minister? Was the Minister aware of the concerns of an important government agency?

2.3.1 The Tendering Phase

Substantial changes were made to the concept after the Minister's Approval for the project and as a result of the tendering process. These were never submitted for community information, let alone consultation. In fact, the community was not even aware of them until well after the contract was signed.

Further changes occurred during negotiations with the successful contractor in the period leading to the final Project Deed. These included:

- Lengthening the tunnel at the eastern end and changing the configuration of the Gore Hill Freeway to position the tunnel portals in the centre and the Reserve Rd off and on ramps to the side.
- Shifting the Motorway Control Centre from the eastern to the western stack site.
- Ignoring the MCoA no 151 that obliges the RTA, before finalizing ventilation stack design, to consult "with relevant Councils, demonstrate to the satisfaction of the Director General, that potential opportunities to incorporate the ventilation stack within an existing, proposed or newly constructed building have been appropriately considered through the selected proposal invitation and final design process." There is no evidence of any consideration or selected proposal invitation to design such a building for the eastern stack, despite a great deal of pressure from Lane Cove Council and community representatives to achieve compliance with the Minister's Condition.
- Altering the configuration of the ventilation tunnels from the design submitted to the Minister for approval. This change resulted in the deletion of 1,600m of tunnel and probably saved the Contractor around $60m.

While some of these changes would not have aroused controversy, the fact that they were carried out in secret, with no consultation either with the community or the relevant Government agencies, is cause for serious concern about process. For example, internal documents tabled under Parliamentary

Privilege disclose that the EPA protested strongly to the RTA for not notifying them of the arrangement with the Lane Cove Tunnel Company to eliminate the 1,600 metres of ventilation shaft after the design was approved by the Minister.

This lack of disclosure was possible because the RTA has the power to determine whether or not changes are "minor" or "consistent with the Minister's Approval." If they are, then there is no requirement to inform the community or Government agencies such as EPA or DoP. EPA expressed dissatisfaction with the RTA's conclusion, but could do nothing about it.

Allowing the proponent to determine whether or not a proposed change is "minor" or "consistent with the Minister's Approval" is clearly problematic. There is no check on the RTA's power, no independent scrutiny of such changes, the Minister's Conditions of Approval can apparently be altered or ignored and there is a serious lack of transparency of process. This provision, coupled with the ability of the RTA to overrule or ignore 'advising' Government Departments or Agencies such as Health and EPA ensures that community consultation has little, if any, impact on the negotiation of a contract for the Lane Cove Tunnel or any major infrastructure project.

3. Term of Reference i)

*i) **The methodology used by the Roads and Traffic Authority for tendering and contract negotiations in connection with the Lane Cove Tunnel.***

3.1 A compromised and Tainted Process

LCTAG has serious concerns about the process of both the tendering and contract negotiation for the Lane Cove Tunnel.

As has already been demonstrated in this Inquiry, the RTA makes itself vulnerable to commercial pressure and even perceptions of possible corrupt dealings when it demands what amounts to a high entry fee from potential contractors and negotiates that fee in secret.

If such fees are to be charged, they should be declared publicly and not subject to 'commercial in confidence' provisions. The public has a right to know:

- What is the basis and scale of such fees and how they are calculated.
- Precisely what the successful tenderer is 'buying' for the payment of the fee.
- The use to which the RTA or the Government will put the fee.
- What trade-offs, if any, are made to 'protect' the value of the fee.

The RTA's refusal to consider filtration systems, even when they were presented by tenderers as technologically and economically viable inclusions in an efficient ventilation system, was inappropriate, to say the least. The RTA was well aware that EP systems had been used successfully in Japan for almost 25 years and that they were being installed or considered in other countries as the best practice option for long, heavily trafficked road tunnels in urban areas. As shown earlier in this submission, it appears that the primary reason for rejecting this technology was a stubborn refusal by the RTA not to lose face. This appalling vanity and arrogance has tainted the tendering and negotiating phases of the tunnel contract and resulted in an inferior ventilation system.

Term of Reference j)

j) Any other related matters

4.1 Community Consultation

Community consultation has been an area of constant discord and dissatisfaction for all three tunnel projects. The nub of the problem lies in the interpretation of the word 'consult.' The RTA – and hence its contractors- seem to think it is a synonym for 'inform.' The process, as they wish to conduct it, is to present information, invite comments and use those comments to justify and defend their intended actions or entrenched positions.

Despite our previous experience with RTA sponsored community consultations, Lane Cove community representatives hoped this process would be one of cooperation and negotiation. After all, this is a community that had campaigned and lobbied to achieve the project. We wanted it to work and we wanted the best possible community outcomes.

The authors are community representatives on (respectively) the Lane Cove Tunnel Air Quality Community Consultative Committee and Construction Community Liaison Group 2 (dealing with all aspects of construction on and under Epping Rd between Mowbray Rd and the Pacific Highway). The volunteer workload for these groups is substantial – monthly meetings, reading sometimes complex material and writing submissions. For CCLG2 this latter task has been particularly onerous as this area includes most of the tunnelling works, the mid-tunnel access, air intakes, Epping Rd urban design and landscaping works and the cycle and pedestrian path.

Neither the RTA nor the contractor, Thiess John Holland (TJH) has ever bothered to pretend that our advice or recommendations will be acted upon, unless they are peripheral to the main activity. (For example, they are often prepared to add a few more streets to a community notification, but that doesn't affect the main game.) TJH would prefer community members to respond to all documentation as individuals. They do not like the CCLG2 practice where community members meet as a group to discuss major Plans or proposals. There we put our views, try to reach compromise where there are differences of opinion and devise recommendations. One member writes up the group's comments and, after every member has been given an opportunity to comment on the draft, it goes to TJH as a joint submission. In fact, TJH is so opposed to this approach that there was an attempt to forbid it early in the consultation phase and another, later attempt to discourage it. This occurred despite the fact that the Minister's Condition of Approval No. 14 (MCoA) states that the Groups shall make "comments and recommendations," we were initially told we could not make recommendations.

In addition, despite Condition 14 stating that the Groups shall "monitor compliance with these conditions of approval and other matters relevant to the operation of the Project," we are constantly told we are 'not a decision-making body." This occurs even when we are attempting to insist that the Minister's Conditions be met.

4.1.2 Changes to the Project

Despite a responsibility under the MCoA to consult, major changes occur without any information, let alone consultation. Two important examples are:

- Changes to traffic predictions that will increase pollution emissions from the vent stacks was revealed in a report by Dr Peter Manins, CSIRO Division of Atmospheric Research. His findings so displeased the Lane Cove Tunnel Company that Dr Manins was not permitted to attend the AQCCC meeting to speak to his report and its findings. This was despite the fact that Dr Manins was supposed to have been employed to advise the community, a difficult task since he was not permitted to speak to community members outside the AQCCC meetings!
- Re-locating the ventilation tunnel at the eastern end. This was one reason why TJH was digging at the spot where the now infamous cave-in occurred.

Many of the most serious issues raised by CCLG2 have not been resolved despite months of so-called consultation. These include safety issues with the Cycleway and Pedestrian Plan and Sub Plan C for Epping Rd such as:

- The cycleway runs directly alongside property boundaries in some areas, past pedestrian exits with poor sightlines.
- There are conflicts between cyclists and pedestrians, especially around bus stops. No physical means is provided to slow cyclists, especially those coming downhill at speeds up to 50kph, in areas where bus shelters make visibility difficult.
- In some areas there is very poor visibility for motorists coming out of steep upward sloping driveways. They have to look for cyclists coming from both directions as well as make a safe entrance on to what will still be a busy Epping Rd.

- A slip lane in Longueville Rd at the entry to the Lane Cove Village is already a danger spot. It will became more dangerous as RTA and TJH have not only ignored recommendations to change the intersection to a safer, right-angled corner, but have shortened the merge distance in an environment of fast moving traffic.
- The cycle/pedestrian underpass linking Longueville Rd and the Gore Hill Freeway cycle/pedestrian path is a dog leg with a serious blind spot that is not safe, especially for pedestrians at night.

4.1.3 The Independent Community Liaison Representative (ICLR)

There is a great need for the ICLR to be truly independent of the RTA and its contractor. The MCoA state that the ICLR should be available for direct contact by the community during standard construction hours. The original MCoA stated that the ICLR should work from the Tunnel Display Centre. Neither ICLR has been genuinely available to the community at large. In fact it would be amazing if residents were even aware of the position, let alone the person.

The close association that seems to develop between the Company, the RTA and the ICLR makes genuine independence extremely difficult, if not impossible. While the current ICLR is generally a fair and reasonable meeting Chair, she has never spent any time with community representatives or meeting the community generally, yet she clearly meets and has frequent discussions with TJH and the RTA. The problem at this stage is more with the definition of the position, rather than the incumbent. However it has become increasingly clear that the community needs an advocate far more than the Company!

4.1.4 What Should be Done?

The whole process of community consultation needs to be overhauled. The term 'consultation' must be clearly defined so that the community, the RTA and the Contactors know what is expected. The process must be far more robust than a mere sharing of information.

Consultation should occur after the Representations Report if substantial changes are made to the EIS concept and again if changes are mooted between Representations Report and signing a contract. The determination as to whether changes are significant should not be left to the RTA.

Community views should be taken seriously and reasonable recommendations implemented. LCTAG does not expect that every community suggestion will be adopted. Clearly that is not realistic. However there should be a genuine willingness to consider suggestions and to make changes where appropriate, rather than a dogged persistence with what appeared in the 'concept' because that is easier.

There should be an obligation on the RTA and its contractors to meet the MCoA – including construction noise limits. When it is deemed necessary to alter the MCoA during the construction or community consultation phase, the alterations should be properly justified and substantiated and should be explained to the CCLGs and AQCCC by the Department of Planning.

4.2 Air Quality and Poisonous Plumes

Unlimited and free access to clean air of acceptable quality is a fundamental human necessity and right.

The lung is a critical interface between the environment and the human body. An average person takes about 10 million breaths a year and about 16 cubic metres of air every 24 hours. The internal surface area of the airways in the five lobes of the human lung is about equivalent to that of a tennis court. Hence toxic substances in air can easily reach the lung and produce harmful effects locally and in other organs.

Adverse effects of exhaust pollutants now include increased infant mortality (*New Scientist* 3 July, 2004); chronic deficits in lung development of children aged 10-18years (*New England Journal of Medicine*, 9 September, 2004); acute heart attacks (*New England Journal of Medicine*, 20 October, 2004); and an association between ovarian cancer and exposure to diesel exhaust fumes (*International Journal of Cancer*, 20 August, 2004).

The World Health Organisation recently reported serious concern about the health effects of vehicle pollutants and of the polycyclic aromatic hydrocarbons (PAH's) which are cancer-causing and can coat fine exhaust particles or exist as vapours. (http://www.euro.who.int/document/E83080.pdf). Diesel exhaust is around 40 times more carcinogenic than cigarette smoke on a weight/volume basis (Gong and Waring, 1998). Up to a fifth of lung cancer deaths have been attributed to exposure to fine particles of vehicle exhausts. (http://www.newscientist.com/hottopics/pollution/pollution.jsp?id=23331100).

Researchers reported a compound, 3-nitrobenzathrone, found in diesel exhaust fumes may be the strongest carcinogen ever analysed and warn that it could be partly responsible for the large number of lung cancers in cities. It produced the highest score ever reported in an Ames test, a standard measure of the cancer-causing potential of toxic chemicals. (*New Scientist*, 25 October 1997). (NewScientist971025-p4.pdf)

A UK study (*J Epidemiol Community Health* 1997; 51:151-159) looked at 24,458 children dying of leukaemia and cancer in the UK over a 25 year period. It found that these children were **35% more likely than chance** to have lived **within 4 km of a major motorway**.

Twice as many people died in Sydney in 2000 from air pollution than from road accidents (*Australian Bureau of Regional Economics Report,* September, 2003).

Fine particles, unlike coarse ones, are **mainly soluble** in the lung and represent more than 85% of the particle content of exhaust emissions. In NSW, continuous monitoring of atmospheric particles is underestimated by up to 40% (Katestone Environmental Report, Lane Cove Council, April, 2003) because the NSW Department of Environment and Conservation neglects to incorporate correction factors for accuracy. Without accurate measurements of the pollution levels it is not possible to determine the real health risks or to detect exceedances of the air-quality standards. Such tolerated abuses are well documented and seem exploited by the RTA in managing the M5 East, CCT and LCT air-quality studies. It appears so much easier to establish 'compliance' when monitoring data are underestimated and skewed. This outrage is compounded when NSW Health incorporates such data into its 'internally managed' determinations of "no health-impact" studies.

The Report, by Child and Associates, into international developments in tunnel emission treatment systems was finally released by the RTA, late in 2004. Claims by the RTA that the Child Report supports RTA's 'Filtration Trial' are spurious because the first version of the 'independent' Report was completed before former Minister Scully announced a 'Filtration Trial' in March, 2004. LCTAG is concerned that the subsequent April and September, 2004 versions of the Child Report appear to have had major amendments made to them by the RTA. Why was the author prevented by the RTA from addressing issues such as the applicability of filtration systems to the M5 East, cost effectiveness and making recommendations, despite the MCoA of the M5 East requiring him to do so? Papers tabled by Parliamentary Order show the scope of the Child Report was narrowed by the RTA to ensure the author did not look at issues with potential to embarrass the RTA. Detailed information in the April version that contradicted RTA's misleading report about their visit to Japan was expunged in the final September version. Nevertheless, the Child Report did describe filtration as 'mature' technology that works effectively.

RTA's General Manager of Motorways, Gary Humphrey recently had the temerity to

assert: *"Filtration will not be installed in the Lane Cove tunnel because air quality standards will be met"*. Mr Humphrey's comment engenders absolutely no confidence against a background of RTA's appalling track record of misleading information and tardy reporting, subject to critical attack in 2004 by the Parliamentary Staysafe Committee. Yet, former Roads Minister Scully could announce publicly in March, 2004, to his colleague - the Hon Angela D'Amori MP, Member for Drummoyne - *"If the M4 tunnel is built, **it will have filtration.**"*

LCTAG believes that an obligation of due diligence applies both to the Regulatory Authorities and also to the Lane Cove Tunnel Company (LCTC). This obligation is to implement proven measures to clean and detoxify the highly polluted tunnel airstream. Such measures would be consistent with the Precautionary Principles and include the in-tunnel installation of electrostatic precipitators and denitrification systems. Failure to remedy the known toxic emissions, LCTAG believes, may contravene the Protection of the Environment Operations Act.

4.3 The Art of Perpetuating a Public Health Hazard

In April 2004, NSW Health released its findings from Phase 2 of its 'Investigation into the possible health impacts of the M5 East Tunnel Stack.' The conclusion reached was there was *"no evidence of an association between the prevalence of reported symptoms and the modeled emissions* (annual averages of pollution levels in previous year) *from the M5 East stack."* The results of the study were subsequently used by the RTA and the former Roads Minister Carl Scully to claim that the impacts of tunnel emissions are free of risks. The results have also been used by NSW Health in providing advice that a major development incorporating a primary school did not have health impacts from the M5 East stack, despite knowing that their assessment excluded children and long-term health impacts.

In the knowledge of glaring inadequacies in the NSW Health Report, Lane Cove Council (LCC) commissioned an independent review by three experts, outside of NSW, and coordinated by Dr Peter Best of Katestone Environmental in Queensland.

After very detailed examination of the NSW Health Report, the Katestone Review recommended that *"Council not accept the findings of the Phase 2 report"* noting that *"The Phase 2 findings of no association between the prevalence of reported symptoms and modeled emissions from the M5 East stack are readily criticized for potential flaws in study objectives and design."*

On Tuesday 8 February, 2005, representatives of NSW Health met at LCC to discuss and respond to the serious criticisms. To the dismay of those present, there was no intent by NSW Health to withdraw their Report. Compounding this intransigence was the revelation by NSW Health that they had submitted their Report as a 'paper' to an undisclosed journal for 'peer-review' and publication. They now know that pollution was discharged from the ends (portals) of the tunnel during the study period making their own data-sets invalid.

The Lane Cove Tunnel Action Group Inc (LCTAG) and Residents Against Polluting Stacks Inc (RAPS) now want NSW Health to acknowledge publicly that they were unaware of the frequent discharge of pollution from the tunnel portals during the study period and withdraw their Report forthwith. We are also concerned that Parliament was misled by NSW Health who claimed that the study design and methodology had been reviewed by experts. The truth is that Professor Brunekreef, the only expert they asked, rejected their methodology before they started and no external review by experts was carried out.

Furthermore, why did NSW Health not bother to validate the basis of their data of stack emission and ask the RTA or tunnel operators if portal emissions had occurred? Why did the RTA not stop the regular, mostly unapproved discharge of pollution from the portals of the tunnel, and why did the RTA not advise NSW Health accordingly?

LCTAG also wants to know why Dr Michael Staff and his team at NSW Health did not correct the record when their Report had been deliberately misused publicly and politically, knowing full-well that 'at-risk receptors' such as children were excluded, producing bias for a negative finding. Only acute effects, not long-term ones, were assessed using methodology that did not and could not determine the pollution exposure of the respondents to the NSW Health phone questionnaire conducted over four weeks.

Whilst it was common for complainants to report on odour issues, NSW Health was quite dismissive without explanation of the odour source. Recent scientific reports confirm that odours can be indicators of potential risks to health due to one or more co-pollutants. A more serious field study of odour plume-characteristics as well as a positive response by NSW Health to manage the problem is warranted.

To date, LCTAG believes that the NSW Health, RTA, EPA and the Department of Planning appear to adopt the same strategies used successfully to support the use of white asbestos (chrysotile) as a safe material (*J. Occup. Environ. Med.*, 2005; 47: 137-144). The same techniques, LCTAG believes, are being used to subvert the community into thinking exposure to vehicle pollutants is without risk to health and well-being. It can be readily inferred from the highly critical Katestone Review of the NSW Health Report that, as with the asbestos scandal, a "denial" of the hazard of an agent by its protagonists, no matter how distinguished, may not correspond with "the truth, the whole truth and nothing but the truth."

The conclusion of NSW Health's findings seems consistent with a popular form of "denial" used by the advocates of asbestos and runs like: *"We did not find the evidence for a causal association between an agent and its alleged effects"* when the evidence is based on such factors as:

- Unsound "negative" results derived from flawed data, methodology and study-design.
- Concealment of data that effectively removes scientific rigour and renders a reviewer powerless.
- Sampling (or questionnaire) not properly conducted in the true exposure and breathing zones.
- Manipulating the thinking of people by the release of false information, rather than a disclosure of the true facts publicly.
- Deliberately avoiding definitive answers to a number of important questions by failing to establish and operate a long-term sampling strategy for determining the qualitative and quantitative measures of hazard exposure of subjects in the study.
- Early denial is given authority when made by government or industry medical officers or by some medical consultants and others, often with 'conflicts of interest'. The significance of the hazard is down-played with a "so what?" attitude.
- Claiming to adopt "world's best practice" to imply, falsely, there are no risks to health.
- Omitting significant numbers of workers (receptors) and thereby introducing a 'negative' bias.
- Applying inappropriate standards or methods to effectively minimize the concentration of the hazardous agent in the exposure.
- By initiating an 'epidemiological survey', as a ploy, when faced with a health problem, or to simply ignore the problem. It buys time, similar to RTA's 'filtration trial.'
- Deliberately terminating studies at a stage when findings are suggestive.
- Failing to adopt Precautionary Principles to contain the toxic agent by not installing adequate environmental control technology.
- Suppressing highly critical 'audits of performance' for political expediency.

There have been too many studies world-wide which directly link vehicle emissions with mortality and morbidity for NSW Health to engage in a study where they would not be able to find the associations between stack emission and community health LCTAG believes that these strategies used to hide the public health hazards of asbestos for over a century also feature in the techniques adopted by NSW Health to perpetuate the **myth** to the NSW Government and its bureaucrats that the exhausting of vehicle pollutants from tunnel stacks, in residential areas, poses no health risk, either short or long term, for anyone.

It is high time lessons from asbestos, tobacco, exposure to radiation and the like are learnt and as the Hon Ms Sandra Nori, a Government Minister in the NSW Government and Member for Port Jackson said that action *"must be taken to protect our communities from the impact of car emissions by using the latest and best tunnel filtration technology available"*. Ms Nori should know the health impacts of vehicle emissions as she is Secretary of the ALP's Air Pollution Task Force.

Conclusion

Many of the problems that have arisen in the Lane Cove, Cross City and M5 tunnel projects stem from what is shown in the documents tabled in Parliament to be an unhealthy alliance between the RTA and large infrastructure companies. In addition, the RTA appears to have almost unfettered power to ignore the advice of Government agencies such as NSW Health and EPA. The Department of Planning seems to exercise very little control in its planning approval role.

The EPA and NSW Health have a responsibility to protect the environment and public health. One way to do that in long tunnel projects is to insist on the installation of filtration technology inside the tunnels. The RTA has adopted an irrational and negative mindset about these technologies and refuses to budge lest *"the reputation of the Government and the RTA"* be damaged – presumably by admitting they were wrong and being seen to change their minds in accordance with the evidence! This attitude

persists despite the RTA having commissioned a report from a reputable and qualified professional who concluded *"that mature and established technologies are now available to remove suspended particles, nitrogen dioxide, some portion of other oxides of nitrogen and hydrocarbon vapours from road tunnel exhaust air."*

There is sound scientific evidence to show that motor vehicle pollution is dangerous to human health. It is worth remembering that in Sydney in 2000 more people died from air pollution than were killed in road accidents. Unfortunately, NSW Health seems more concerned to protect its flawed M5 Health Study (and perhaps to be seen not to oppose the RTA) than to recommend technology that could make at least some impact on that horrific statistic.

Flaws that were pointed out in the EIS Air Quality assessment were ignored, defended or covered up by the RTA. EPA's concerns were dismissed and never revealed to the public.

Significant changes were made to the Lane Cove Tunnel design after the EIS and again during the contract negotiation stage. None was subjected to community consultation and, worse still, some were not even communicated to EPA and the Department of Planning. These changes were not subject to any scrutiny, either from the appropriate Government agencies or from the public. At least one – the failure to consider potential opportunities to incorporate the eastern vent stack within a building – appears to contravene the Minister's Conditions of Approval (MCoA No 151).

The entire tendering and contract phase has been tainted by the RTA's demand for up-front fees from prospective contractors and by refusal to consider tenders including filtration technology.

Community consultation has been difficult from the EIS through the construction phase. Community members still have serious, unresolved issues and there is no indication of a favourable outcome. LCTAG believes that there must be an overhaul of the community consultation process that ensures genuine consideration of community issues and recommendations.

In the end, these projects must demonstrate at least an equal concern for the best community outcomes as they do for the financial gain of the private companies concerned. If this cannot be achieved, the answer is for Governments to take full responsibility by financing and building future roads and tunnels themselves. There is no doubt that the current situation is simply not good enough.

Appendix 1 – Summary of Tabled Documents, October 2003

1) EPA correspondence (no date):

The EPA alleges the RTA's Representations Report (RR) does not adequately address a number of environmental issues raised previously by the EPA in its EIS comments.

- EPA states it does not review or approve an Environmental Management Plan (EMP).
- RTA ignores key components of an effective audit.
- RTA proposes on-site parking for "personnel." – EPA claims this is at odds with commitment to encourage public transport.
- EPA claims the RTA's Section on Moore Street is both internally inconsistent loads/day *vs* trucks movements/day.
- Noise and impacts inadequate
- EPA cannot make a formal determination on air quality impact assessment; stack emission concentration and load limits; stack velocity without proper and complete data.
- Health risk assessment inadequate
- EPA alleges Holmes Air Sciences (HAIRS) under-estimates health risk assessment.
- EPA – data must be readily understood by an average person.
- Noise impacts from stacks ignored.

2.) Lisa Corbyn (DG of DEC) to Paul Forward (CEO, RTA), 11 July, 2002.

EPA alleges the RTA submitted the RR to Planning NSW without resolving outstanding issues with EPA.

The EPA assert: *"It is important these air quality issues be assessed rigorously and transparently prior to submission of the final RR."*

3.) Lisa Mitchell (Planning NSW) to J. Betts (RTA), 1 July, 2002

Planning NSW requests RTA to send the R.R. to EPA who were not told of submission of the RR by the RTA to Planning NSW.

4.) HAIRS response to EPA queries, 10 July, 2002.

- "optimum" ventilation parameters cannot be established.
- - health risks resulting from stack emissions should be balanced against reductions in risks that occurs as a result of releasing what were formerly roadway emissions from the stack.
- EPA identifies self-contradiction by HAIRS in health risk assessment.
- EPA sent a corrected version that HAIRS failed to send to EPA..

Notes by RK: HAIRS puts up very weak defence. 'Fiddle factoring' is clearly evident in response by HAIRS

5.) Planning NSW (Lis Mitchell) received responses from J. Betts (RTA), 22, August, 2002.

(many pages/tabulated Questions & Answers.)

Note by RK: Many of the responses by RTA have not been tested independently. Concerns are held that the responses appear 'doctored'.

6.) EPA to Planning NSW and to J. Betts (RTA) (no date)

"EPA considers HAIRS, 2002 does not fully address the stated additional information. "

EPA alleges HAIRS 2002 provides results for only one LCT stack.

EPA allege a predicted high cancer health risk around the western stack - 3 times higher than 1×10^6

HAIRS, 2002 dismisses EPA's concern about impact of cold starts. EPA in response demands qualitative data and analysis to substantiate view of HAIRS. Such data were missing and not disclosed to EPA or to the community

7.) Lisa Mitchell (Planning NSW) to J. Betts, (RTA) 1 July 2002

Planning NSW admonishes RTA for not answering questions.

8.) Paul Forward (RTA) to S. Holliday (Planning NSW) 24 June, 2002

"I am satisfied that the construction and operation of the proposal as so described will affect the environment."

RTA requests approval of modified ventilation design, incorporating a tunnel shaft etc.

9.) Joe Woodward (EPA) to Sam Haddad (Planning NSW)

". . .EPA raises concern about the transparency of the environmental assessment process and the adequacy of the RR to clearly demonstrate to the public how environmental issues have been addressed. EPA cannot assess in the absence of adequate information."

10.) John Goodwin (EPA) to Caitlin (Planning NSW) 9 October, 2002

- *"$PM_{2.5}$" – "no data to set compliance standards."*
- *"NEPM only apply to regional air quality and not to specific premises or facilities."*
- *"$PM_{2.5}$ – for reporting purposes only. It is not appropriate to apply these benchmarks as compliance goals for the tunnel projects."*

11) John Goodwin (EPA) to Minister, 18 December, 2002

Role of EPA: The EPA will issue a licence for the construction of the CCT and LCT to control noise, dust, spoil and water management only.

Note by RK: EPA appears not to have responsibility over air quality compliance. This appears now to be the responsibility of Planning NSW. The effect is that not one department accepts responsibility for determinations or compliance of accurate measurements of air pollution. The stage is set to begin the process of negligence in a 'duty of care' through a documented litany of 'buck-passing'.

12.) Paul Forward (RTA) to S. Holliday (Planning NSW) 25 October, 2002
Proposal to modify ventilation *". . . been assessed and considered to have a nett beneficial effect in comparison to the EIS project."*

". . . minimal impact on local community."

"... has support by staff in principle."

Note by RK: This proposal was severely criticised by the visiting Japanese because of the location of intake vents near exhausts. There is no evidence that the 'ventilation shaft' has been evaluated independently. What does P. Forward mean it will have *"minimal impact on the community"*? RK asserts that the design will enhance fine particle formation and hence when exhausted, untreated, it will impact more adversely on the community.

13.) Lisa Corbyn (EPA) to P. Forward (RTA) 11 July, 2002
Further questions – information demonstrates an estimated risk greater than 1×10^6 i.e., 3 times higher. EPA warns that when such thresholds are exceeded EPA then triggers action to reduce health risks greater than 1×10^6 (RTA provides no information about mitigation options.) etc.

Notes and comments by RK: The reader is advised of the following information regarding the Occupational Health and Safety Act:

The Australian Financial Review reported on (Monday 8th September 2003) – *"The High Court has opened the door for asbestos companies and victims to lodge multimillion-dollar claims against governments for their failure to protect workers from the material."* Does this mean that known disease from vehicle emissions will also follow the path for future taxpayers to front yet another bill for the actions, inaction or negligence of those elected or paid to be responsible for providing guidance or solutions?

Does this also mean that all government employees can take action against their employer for unsafe work places and practices under Workcover? If so does this mean the taxpayer will pay again? What about employees of e.g., SC Johnson (LC West) and Weir Warman (Artarmon)?

The broader issue, other than the experiences above, that LCTAG would seek input on are;

Under the OHS Regulation 2001 (as posted on the Workcover web site) includes;

Chapter 1, Preliminary

Public Place- means a public road or any other place to which the public, whether on payment of a fee or otherwise, ordinarily has access.

Premises – included any place, and in particular includes; a) any land, building or part of any building, or b) any vehicle, vessel or aircraft, or c) & d)

Employer – means a person who employs persons under contracts of employment or apprenticeships. **Advice from Workcover is that employers includes all levels of Govt.**

Chapter 1, Division 4 – Atmosphere Definitions: atmospheric contaminant means (a) a hazardous substance that occurs in the form of a fume, mist, gas, dust or vapour, or (b) an asphyxiant, or (c) nuisance dust, to which persons may be exposed in the working environment.

The following Clause in the Act is especially relevant as it identifies an obligatory duty of care to control a 'hazard to health'. I believe the 'engineering' means (see 'c' below) to do so is by proven electrostatic precipitation and gas-detoxification, not by a '3rd ventilation tunnel' that is not cost-effective.

The 3rd ventilation shaft is claimed by the RTA to be needed to protect motorists and maintenance workers IN the tunnel. The same principle has applied to the Cross City Tunnel.

Is this RTA's attempt to conform with the OH&S Act, 2001 in a highly discriminatory manner? What about the employees of SC Johnson and Weir Warman as well as residents around untreated stack emissions? How can these employers conform with the Act and protect employees from emissions approved by instruments of Government?

Chapter 1, Clause 5 Meaning of "control" of risks
For the purpose of this regulation, an obligation to **control** a risk to health or safety (in any case in which the elimination of the risk is not reasonably practicable) is an obligation to take the following measures (in the order specified) to minimise the risk to the lowest level reasonably practicable:

- firstly, substituting the hazard giving rise to the risk with a hazard that gives rise to a lesser risk,
- secondly, isolating the hazard from the person put at risk,
- thirdly, minimising the risk by engineering means,
- fourthly, minimising the risk by administrative means (for example, by adopting safe working practices or providing appropriate training, instructions or information),
- fifthly, using personal protective equipment.

A combination of the above measures is required to be taken to minimise the risk to the lowest level reasonably practicable if no single measure is sufficient for that purpose.

Any obligation in this regulation to control a risk by taking specific risk control measures, or by taking specific risk control measures in a particular order, is in addition to the obligations referred to in subclauses (1) and (2).

Chapter 1, Clause 8 Responsibilities held by more than one responsible person

If more than one person has a responsibility with respect to a particular occupational health and safety matter under this Regulation:

- each person retains responsibility for the matter, and
- the responsibility is to be discharged in a co-ordinated manner.

Chapter 2, Clause 9 Employer to identify hazards

Chapter 2, Clause 10 Employer to assess risks

Chapter 2, Clause 11 Employer to eliminate or control risks

Chapter 4, Clause 36 Controller of premises to eliminate or control risks

A controller of premises must eliminate any risk, arising from the premises, to the health or safety of any person accessing, using or egressing from the premises.

If not reasonable practicable to eliminate the risk, the controller of the premises must control the risk.

A controller of premises must ensure that all measures (including procedures and equipment) that are adopted to eliminate or control risks to health or safety are properly used and maintained.

Chapter 5, Clause 136 Use of plant – registration requirements and particular risk control measures

(3) An employer must ensure in relation to use of plant that:

- plant is subject to appropriate checks, tests and inspections necessary to minimise risks to health and safety, and
- if the operation or condition of plant presents an immediate risk to health or safety, the plant is withdrawn from operation until the risk is eliminated or, if this is not practicable, controlled.

A reference in this clause to an employer extends to an owner of plant affecting public safety.

Chapter 5, Clause 136 Maintenance and repair of plant – particular control measures

An employer must ensure in relation to the maintenance and repair of plant that:

- repairs to the plant are carried out so as to keep the plant within its design limits.

In this clause: a reference to an employer extends to an owner of plant affecting public safety.

From the above it is apparent that as an employer having an employee in a vehicle where the issues of vehicle emissions have created a health and safety issue there is only limited actions that can be taken to comply with the OHS Regulations. The fact that the vast majority of vehicle emission pollution in major cities is sourced from government vehicles (refer below RMIT) and there is no action on their part to take corrective action. How does an employer take appropriate action short of having all employees drive with respirators on?

Is the government (all levels) in breach of the Act and if so are they subject to fines? Would this be at the level of Minister, Department Head or Supervisor or all of them, or does it extend to the Premier or the Prime Minister? Would they be indemnified for failing to comply with OHS legislation?

The frustration associated with knowing of a hazard, being unable to fix the hazard or comply with legislation is compounded by the problem with "Duty to Notify Pollution Incidents Under the NSW POEO Act" as "a pollution incident is required by the POEO Act to be notified if it: involves actual or potential harm, that is not trivial, to the health or safety of human beings or to ecosystems:"

With reference to the following comments by reputable sources how do some "exist" within the framework of legislation, obligations as an employer and being concerned with the environment?

The current legislation "gap" coupled with the low awareness by the consumer that their "environmentally friendlier" vehicles produced after 1988 have provided a false sense of security in the current exhaust emission levels of motor vehicles. It has been politically okay to penalise owners of older vehicles operating on leaded fuels but the fact that a catalytic converter has an effective operating life of 5 years, shorter if tampered with or damaged, has not been made common knowledge. Once damaged, the vehicle emissions will result in higher levels of air pollution. The issues of in-service diesel vehicles have not been addressed.

Following discussions with a wide cross-section of the various State and Territory politicians and public servants the standard excuse for no new laws has been; "legislating for passenger vehicles whilst the diesel emissions are unchecked would not be acceptable to the voters".

2. There are now guidelines for new diesel vehicles in place and again there is a high degree of "buck passing", ignorance and little activity relative to the available solutions for in-service or aftermarket diesel vehicles or stationary engines.
3. Recently, in addition to numerous scientific reports, there have been a number of press reports indicating the dangers of diesel emissions and the effect on the lives of people;

(a) ABC Television – 4 Corners 5th November 2002

Title: Search for A Supermodel

Professor Tony McMichael – National Centre for Epidemiology ANU :

"There are more deaths being caused by urban air pollution than there are by car crashes" ..... "the greatest hazard to human health, to lungs and the heart, come from the particles that we refer to as the sub-2.5 micron particles."

"these are very, very fine particles of the kind that are particularly produced by diesel engines."

RMIT University – Dr Ed Boyapati presented the findings at the 8th International Conference on Energy and Environment in Cairo, Egypt (January 2003).

"Research from RMIT University shows that public transport networks release more greenhouse gas emissions than private cars. According to the study, trams produced the highest amounts of greenhouse gas emissions followed by trains, buses and cars".

Radio National (ABC) – Monday 28th April 2003

Summary ;

"exhaust from diesel vehicles is everywhere and is probably more carcinogenic than cigarette smoke – but it's not regulated like smoking in public places. In fact our tax system encourages more of the stuff. With air pollution shortening the lives of 2000 Australians every year, where's the "Quit" campaign against dirty diesel in the cities?"

"..... As particulate concentrations in the air rise, so do the death rates, from a variety of causes. And that's not counting those who suffer a range of pollution-related illnesses."

Planet Ark : Cleaner off-road diesel vehicles may save 8,500 lives – report. June 11, 2002

"Washington – The Bush administration should adopt tough federal pollution emission standards for bulldozers, farm tractors and other off-road diesel vehicles to prevent 8,500 premature deaths and 180,000 asthma attacks each year, state and local environmental regulators said in a report released yesterday.".

Whilst the Governments at all levels tend to ignore the issues of exhaust emissions this provides a potential problem under various Workcover Legislation as the work environment for such employees as drivers, toll collectors, parks & garden staff, workers in the Lane Cove Industrial Estates etc is not safe relative to potentially fatal diseases caused by vehicle emissions. Similarly, the same hazards impact adversely on residents as well as workers e.g., SC Johnson Pty Ltd (west LC) and Weir Warman Pty Ltd (east LC/Artarmon) exposed to toxic stack emissions. How do the employers address such workplace toxic hazards from stacks?

Whilst we have stated early in this document that such a community would possibly benefit from the introduction of vehicles emissions testing and in-service emissions standards the over-riding conflict of being in breach of legislation and being unable to comply would indicate that there should be no employers as they are guilty by inaction of others and defenceless if investigated.

In summary what LCTAG is seeking is advice on how the Government should comply with its own legislation and the associated demands of these and other regulations whilst there are so many conflicts within the expectations placed upon an employer. Employees are assets of our community's business and should be protected from hazards, be they environmental or physical and make every attempt to do so. Similarly residents that are subject to known toxicity from stack emissions must also

have relief in law. Political appointees claiming that the levels of exposure are too low cannot ignore the fact that vehicle emissions are environmental hazards that may cause illness or death.

13.) Lisa Corbyn ((EPA) to Paul Forward (RTA) 5 September, 2002.

Further questions not yet resolved.

Note by RK: What is apparent in the process of the LCT project approval is that the RTA behaves as a rogue bureaucracy that conducts its business in utter contempt of and disregard for due process. Here, it seems, the EPA is treated with such contempt and is seen by the RTA as being mischievous and irrelevant to the aims of the RTA.

14.) J. Woodward (EPA) to Sam Haddad (Planning NSW) 30 August, 2002.

Further questions.

Alleges lack of transparency. See attachment – (PP) Woodward (EPA) to Haddad 30.8.02

15.) J. Betts (RTA) and HAIRS to EPA 6 September, 2002.

- LCT stack heights – west 30M (above ground), 62M above water line (AHD).
- The top balcony of Compac building is 63M AHD ie.,1metre above stack
- east stack is 134 M (AHD) i.e., 8 metres above Corinthian building.

Note by HAIRS – They are not the consultants for the 3rd ventilation shaft for the LCT.

Revised health risk assessment, page 13. *"There will be a number of potentially harmful emissions from the tunnel ventilation stacks including 1,3-butadiene, formaldehyde benzo(alpha) pyrene, acetaldehyde and benzene".*

Note by RK: There is no mention by HAIRS of proven carcinogenic association between lung cancer and fine particles as published in *JAMA* March, 2002. This is typical of the documented, equivocal manner HAIRS deals with information and inconvenient data, even to the extent of blatant lies, as already proven in previous documents

HAIRS reduce the risk of cancer by a factor of 2 because they assume over 70 years pollution will be reduced.

Note by RK: This is negligent activity where it seems the patronising intention is to remove the risk disclosed by EPA by fabricating a scientifically non-valid factor i.e., two-fold reduction. The effect is to manipulate data in a manner that others would also judge to be 'scientific misconduct'.

16.) Andrews Mattes (EPA) to Penny Finlay (Planning NSW) 24 July, 2002.

- Requests data not to be used in external correspondence.
- Concern expressed about unacceptable cancer risk greater than $1/10^6$.
- Claims *"argument that HAIRS state risk is a small percent of the background levels is not relevant."*

See attachment (PP) A. Mattes (EPA) 24.7.02

17.) EPA – meeting 9 August 2002

Health risk of HAIRS still above EPA benchmark. The agenda seeks a discussion of ways to bring the increase below the risk.

Note by RK: This document discloses what seems to be a conspiratorial attempt to collude to find ways to alter the findings so that a disclosed risk is hidden or removed.

18.) EPA – 5 July, 2002

RTA fails to respond to EPA. Up to 10-fold increase in cancer risk.

19.) Nick Agapides (EPA) 26 June, 2002.

Predicted cancer risk is 2-4 times. However, at "elevated receptors" (people) the risk is 10-times higher.

See attachment (PP) Agapides (EPA) 26.6.02

20 a) Planning NSW to EPA 1 November, 2002

EPA's comments are addressed by Holmes to the satisfaction of Planning NSW.

Note by RK: There is no indication that the EPA concurs with the acceptance by Planning NSW.

20 b) Planning NSW alters EPA's recommendation (S. Welchman), 24 October, 2002.

Notes by RK: Seems that the annotations in the draft recommendations indicate Planning NSW has deleted EPA's conditions related to exceedances e.g., provision 62.

Planning NSW has also deleted two of four monitors at ground level.

Note by RK: This deletion has the effect of further reducing the chance of detecting an exceedance due to stack emissions. The effect is to minimise the evidence that can be used by the community to establish a cause and effect relationship in respect of health impacts etc.

21.) Charles Xu (affiliation ?EPA), 24 October, 2002.

Identifies flaws in HAIRS calculations for emissions when EPA alleges HAIRS under-estimates.

Xu confirms HAIRS under-estimates health risks.

Note by RK: This finding is absolutely consistent with the documented assertions by RK and independently validated by Professor Michael Moore (Q'ld).

22.) J. Goodwin & J. Woodward (EPA) – 30.8.02

$PM_{2.5}$ and TEOM correction factors

- TEOM 'Adjustment Committee' not yet made a final recommendation.
- $PM_{2.5}$ TEOM – more controversial because of higher organic content.
- EPA also anticipates that the community will demand similar site correction factors for LCT and CCT should TEOM monitoring be used.
- EPA not recommend course for action to DIPNR – want the Committee to decide.
- Adopting a correction factor for the M5 East may create a precedent.

Note by RK: This is an important document and discloses the premeditated failure on the part of EPA to incorporate correction factors to obtain proper levels of pollution monitoring. The admissions in this document are, I believe, highly damning of the EPA and provide evidence of collusion to be negligent in a duty of care. EPA determined with the knowledge that omissions of correction factors were to be deliberately undertaken that would underestimate particulate monitoring and health risk assessments. This is utterly appalling conduct.

See also Attachment (PP) EPA 7.8.03

23 a.) Lisa Corbyn (EPA) to S. Haddad (Planning NSW) 17 September, 2003.

- RTA and not EPA involved with RAPS to apply a correction factor.
- EPA 'back off' getting involved with the correction factor debate and refer to legal/policy issues.
- EPA reports unadjusted TEOM PM_{10} in all its public reports on regional air pollution.
- EPA intends to continue not to incorporate a correction factor until resolved "at the national level" for "fine particles."
- EPA regards TEOM and Hi Vol are equivalent and do not require correction factors to be applied.

- EPA does not recommend correction factors for CCT and LCT "until further debate."

Note by RK: This is an appalling revelation by the EPA regulatory authorities who are clearly derelict in their duty of care to the community. The document reflects utterly incompetent and reckless conduct.

23 b.) Lisa Corbyn (EPA) 24 January, 2003.

Response to M5 East Parliamentary Inquiry, November, 2002 and recommendations of Committee.

- NEPM do not apply to tunnels or to stacks.
- Operator monitors $PM_{2.5}$ at ambient air quality monitoring stations.

24.) Sam Haddad (Planning NSW) to L. Corbyn (EPA) 15 July, 2003.

M5 East TEOM correction factor.

Should a TEOM correction factor be applied to M5 East, CCT and LCT?

Note by RK. This document discloses, at such a late stage, the deliberate decision to ignore the assertions by the LCTAG and others that the background monitoring by PM_{10} TEOM was underestimated on the basis of overseas practice adopted for over a decade. Yet, Planning NSW, EPA, RTA, Health and HAIRS have, I believe, colluded knowingly to conspire to omit such corrections in a negligent manner.

25.) Andrew Mattes (EPA) to Penny Finlay (Planning NSW)

Concern that risk of cancer reduced by 2-fold on assumption that cleaner fuels will be introduced over the next 70 years.

Note by RK: Here there is concern by EPA of the 'fiddle factor' incorporated by HAIRS to diminish the real cancer risk to insignificant levels.

26.) Nick Agapides (EPA) to John Wasserman and Mark Hather (Planning NSW) 21.5.03

Katestone Report

EPA/ Planning is very defensive of the position by RTA that Dr. Best has refuted.

Note by RK; This document shows an appalling shift in responsibilities that nobody among the Regulatory Authorities wishes to take. Cover-up upon cover-ups!

27.) Holmes Air Sciences (HAIRS) to J. Stricker (RTA) 21 May, 2003

This correspondence is the response by Dr. Nigel Holmes to the report of Dr Peter Best regarding LCT air quality issues raised by Lane Cove Council..

Note by RK; This lengthy report by HAIRS represents a litany of garbled information that has no real substance in either scientific methodology or objective reporting of the facts. The report by Dr Nigel Holmes is devoid of scientific stringency and objective analytical insight. Holmes' failure to face the assertions of Dr Best squarely is clearly evident and inconsistent with statements previously made by HAIRS. The following are a few of the anomalies in the Report:

a) Dr Holmes in typical style, as he did in response to LCTAG's assertions, responds to Dr Best's independently checked analysis by concluding Dr Best's conclusions are: *"irrelevant to the LCT assessment"*

b) Dr Holmes makes the following statement that seems patronising to the RTA:

"The basic assessment methodology used in the EIS has been to accept that NSW ambient air quality goals have been set in such a way that they protect the community from the adverse effects of particulate matter."

Comment by RK : Dr Holmes knows full well that the EPA's monitoring of TEOM PM_{10} underestimate the particulate levels and, therefore, falsify the risk of health Impacts. His statement is positively wrong and misleading.

c) In response to the matter of incorporating correction factors as undertaken in Europe, the response of HAIRS is a flippant *"so what!"* Dr. Holmes then continues *"but I agree with what is being said but how should it be used to change the LCT assessment?"*

Comment by RK: This is the exact manner by which Dr N. Holmes responded to the proven assertions of RK in the LCTAG's Submission to the LCT EIS

"The second paragraph states that in France when TEOM measurements are used for background to introduce the missing secondary particles in the analytical model, a constant correction of 9.5ug/m^3 is added to all grid points. While we question the relevance of this for the conditions in Lane Cove we note that doing this would not alter the conclusion reached in the assessment". (HAIRS, February, 2002 response to LCTAG's Submission to the LCT EIS)

d) In response to the practice in Europe of adding 9.5μg/M^3 to measurements undertaken by TEOM PM_{10} , Dr. Holmes states *"this issue relates to the conversion of pollutant gases NO_x and SO_x etc. to particles that occurs over periods of many hours or days."*

Comment by RK: The statement is wrong and positively and patronisingly misleading as shown as follows:

Paul Filliger et al.
'Health costs due to road traffic-related air pollution. An impact assessment project of Austria, France and Switzerland: PM10 pollution exposure'.
WHO Technical Report on Air Pollution, pp 1-79, June 1999.

The complete article can be accessed at the following link:

<http://www.who.dk/document/trt/pm10.pdf>

The relevant section is copied from page 44 of the article and is pasted below.

Notes:

1.) Filliger et.al. state that TEOM PM_{10} underestimates the secondary particles which are the fine, toxic, respirable ones produced by 'nucleation' from the exhaust gas.

2.) A correction factor of 9.5 μg/M^3 is added to all measurements taken at every grid point.

3.) In direct contrast to the claims of Lisa Corbyn (EPA NSW to S. Haddad, 17.9.03), Filliger et al state the TEOM PM_{10} underestimates the levels compared to the gravimetric Hi-Vol filter method which has a cut-off of 0.3μm (HAIRS, 2001 response to LCTAG). The secondary particles fall into 2 peaks according to size i.e., 0.1μm and 0.03μm (A. Seaton.1996) Thus, even the Hi-Vol technique does not capture all the 'secondary particles'.

***4.2.7 Correction for secondary particles** (p 44 - Filliger et al., 1999)*

In the atmosphere, a substantial part of PM_{10} can arise from long-range transport and chemical gas to particle conversion (secondary particles). The BS (Black Soot) measurement technique tends to underestimate this secondary component of aerosols due to the fact that components like ammonium sulphate and ammonium nitrate (important parts of secondary particles) cannot be correctly measured by this method. The same can be said of PM_{10} when measured by Tapered Element Oscillating Microbalance (TEOM). In this study, only TEOM-PM_{10} data were available for comparison with BS data. TEOM underestimates PM_{10} concentration in comparison to that obtained from gravimetric filter samplers. The underestimate is mainly caused by heating of the inlet air, producing an almost complete loss of ammonium nitrate (and possibly other PM_{10} secondary particles). The satisfactory agreement found between TEOM-PM_{10} and BS in urban sites may be attributed to the fact that the BS method underestimates secondary particles in roughly the same proportion.

To introduce the missing secondary particles into our analytical model, we added a constant correction value of 9.5 μg/m3 to all our grid points for the whole of France. The value of 9.5 μg/m3 corresponds to the regional background of secondary particles as estimated for France by the European scale EMEP model (EMEP 1997).

This is a 'conservative' correction-factor, because the urban-scale portion of the secondary particles is ignored. As a consequence, the resulting map indicates a minimum level for PM_{10}.

Further comment by RK: It is noteworthy that HAIRS claims they did incorporate such a factor and it made no difference as shown in the following statement copied and pasted:

"This section also discusses the findings of a CSIRO report prepared for Environment Australia as the request of the Peer Review Committee of the NEPM. The CSIRO report found that for TEOM monitors measuring PM_{10} concentrations at low temperatures, that there needed to be an adjustment to the measured data in order to make them match the measurements made by the standard high volume sampling system which is the reference method for measuring particulate matter adopted by the NEPM. In practice, the adjustment to the data proposed by CSIRO does not come into effect for measurements made at daily average temperatures above 15 - 17 C. One of the main uses of the TEOM data from Lindfield was to determine a background level to be added to model predictions to determine worst case pollutant levels. For the high concentrations, the adjustments in fact turn out to be extremely small. The reason that the adjustments were not in fact applied was because the CSIRO study only became available after that part of the work for the EIS had been completed. However the recommended changes are too small to be of significance." (HAIRS response to LCTAG's Submission to the LCT EIS, February,2002)

"*LCTAG maintains contrary to the contention of HAIRS that such omissions of secondary particles by HAIRS **does** relate to the serious flaws in the arguments used in the EIS.*

The second paragraph states that in France when TEOM measurements are used for background to introduce the missing secondary particles in the analytical model, a constant correction of $9.5ug/m^3$ is added to all grid points. While we question the relevance of this for the conditions in Lane Cove we note that doing this would not alter the conclusion reached in the assessment." ." (HAIRS response to LCTAG's Submission to the LCT EIS, February,2002)

e) HAIRS refutes Dr. Best's allegations and says *"it is wrong to suggest that concern about effects of particles has increased since EIS was prepared."*

Comment by RK: This is a totally wrong and uninformed statement by HAIRS. HAIRS ignores several recent reports including the large study published in the *Journal of the American Medical Association* March, 2002 that documents an association between eg lung cancer deaths and exposure to fine particles of vehicle emissions. See reference below:

Lung Cancer, Cardiopulmonary Mortality, and Long-term Exposure to Fine Particulate Air Pollution

C. Arden Pope III, PhD
Richard T. Burnett, PhD
Michael J. Thun, MD
Eugenia E. Calle, PhD
Daniel Krewski, PhD
Kazuhiko Ito, PhD
George D. Thurston, ScD

Context Associations have been found between day-to-day particulate air pollution and increased risk of various adverse health outcomes, including cardiopulmonary mortality. However, studies of health effects of long-term particulate air pollution have been less conclusive.

Objective To assess the relationship between long-term exposure to fine particulate air pollution and all-cause, lung cancer, and cardiopulmonary mortality.

Design, Setting, and Participants Vital status and cause of death data were collected by the American Cancer Society as part of the Cancer Prevention II study, an ongoing prospective mortality study, which enrolled approximately 1.2 million adults in 1982. Participants completed a questionnaire detailing individual risk factor data (age, sex, race, weight, height, smoking history, education, marital status, diet, alcohol consumption, and occupational exposures). The risk factor data for approximately 500 000 adults were linked with air pollution data for metropolitan areas throughout the United States and combined with vital status and cause of death data through December 31, 1998.

Main Outcome Measure All-cause, lung cancer, and cardiopulmonary mortality.

Results Fine particulate and sulfur oxide–related pollution were associated with all-cause, lung cancer, and cardiopulmonary mortality. Each 10-μg/m^3 elevation in fine particulate air pollution was associated with approximately a 4%, 6%, and 8% increased risk of all-cause, cardiopulmonary, and lung cancer mortality, respectively. Measures of coarse particle fraction and total suspended particles were not consistently associated with mortality.

Conclusion Long-term exposure to combustion-related fine particulate air pollution is an important environmental risk factor for cardiopulmonary and lung cancer mortality.

JAMA. 2002;287:1132-1141 www.jama.com

BASED ON SEVERAL SEVERE AIR pollution events,[1-3] a temporal correlation between extremely high concentrations of particulate and sulfur oxide air pollution and acute increases in mortality was well established by the 1970s. Subsequently, epidemiological studies published between 1989 and 1996 reported health effects at unexpectedly low concentrations of particulate air pollution.[4] The convergence of data from these studies, while controversial,[5] prompted serious reconsideration of standards and health guidelines[6-10] and led to a long-term research program designed to analyze health-related effects due to particulate pollution.[11-13] In 1997, the Environmental Protection Agency adopted new ambient air quality standards that would impose regulatory limits on fine particles measuring less than 2.5 μm in diameter ($PM_{2.5}$). These new standards were challenged by industry groups, blocked by a federal appeals court, but ultimately upheld by the US Supreme Court.[14]

Although most of the recent epidemiological research has focused on effects of short-term exposures, several studies suggest that long-term exposure may be more important in terms of overall public health.[4] The new standards for long-term exposure to $PM_{2.5}$ were originally based primarily on 2 prospective cohort studies,[15,16] which evaluated the effects of long-term pollution exposure on mortality. Both of these studies have been subjected to much scrutiny,[5] including an extensive independent audit and reanalysis of the original data.[17] The larger of these 2 studies linked individual risk factor and vital status data with national ambient air pollution data.[16] Our analysis uses data from the larger study and

Author Affiliations: Brigham Young University, Provo, Utah (Dr Pope); Health Canada, Ottawa, Ontario (Dr Burnett); University of Ottawa, Ottawa, Ontario (Drs Burnett and Krewski); American Cancer Society, Atlanta, Ga (Drs Thun and Calle); and New York University School of Medicine, Tuxedo, NY (Drs Ito and Thurston).
Corresponding Author and Reprints: C. Arden Pope III, PhD, Department of Economics, Brigham Young University, 142 FOB, Provo, UT 84602 (e-mail: cap3@email.byu.edu).

"Adverse health outcomes are correlated with mass concentration measurements of both PM_{10} and $PM_{2.5}$ and do appear to be more closely correlated with $PM_{2.5}$ suggesting that the smaller particles are more harmful to health than the coarser fraction". (HAIRS response to LCTAG's Submission to the LCT EIS, February, 2002). Thus, HAIRS are not consistent with their own previous statements.

f) HAIRS *state "We have no alternative but to base the LCT assessment on the EPA's mass-based standards".*

Comment by RK: This statement is not in line with the facts disclosed by EPA's Lisa Corbyn (17.9.03) where EPA acknowledges they have been underestimating the TEOM PM_{10} readings to the public. This means that the health risk assessments are correspondingly underestimated (See attachment L.Corbyn to S.Haddad 17.9.03)

FAXED 18/9/2003

Your reference : M5 East - TEOM
Our reference : EXF26741, SR546/05
Contact : Ross Carter, 02 9995 6800

EPA

Director General

17 SEP 2003

(45)

Mr S Haddad
Executive Director
Department of Infrastructure, Planning and Natural Resources
GPO BOX 3927
SYDNEY NSW 2001

Dear Mr Haddad

M5 East Ambient Air Quality Monitoring – TEOM Pm10 Data Correction Factor

Thank you for your letter dated 15 July 2003.

As you note in your letter, the Environment Protection Authority (EPA) was not involved in the decision to apply a correction factor to PM_{10} data collected by continuous TEOM monitors in the vicinity of the M5 East. Rather, the RTA agreed to do this with Residents Against Polluting Stacks (RAPS) and formed the TEOM Correction Factor (TCF) Committee to recommend a way forward on the issue. The EPA assisted the Committee by supplying data from its regional ambient air quality monitoring network and advice about the EPA's approach to managing its regional air quality monitoring data.

I note your request for advice about the implications of implementing the recommendations of the TCF Committee for the Conditions of Approval of the M5 East. The implications of the recommendations for the Conditions of Approval seem primarily associated with legal/policy issues related to the *Environmental Planning and Assessment Act 1979* rather than technical issues and are therefore not within the sphere of the EPA. However, to assist you in making your decision you may wish to consider the current approach of the EPA in terms of its management of regional air quality monitoring data, and also in relation to its approach to ambient air quality monitoring for its scheduled premises.

Firstly, as you are aware, the EPA reports unadjusted TEOM PM_{10} and $PM_{2.5}$ data from its ambient air quality monitoring network in all of its public reports. The EPA will continue to do so until all of the technical issues around monitoring of fine particles is resolved satisfactorily at the national level. Also, the EPA's objective with its regional air quality monitoring data is to provide an input to the public policy process and not as a compliance condition for a specific development such as a ventilation stack. In this instance, a stack emission limit is more appropriate.

Secondly, for the purposes of ambient air quality monitoring by scheduled premises, the EPA may require licensees to adopt either the TEOM monitoring method or the high volume sampling monitoring method. The EPA regards these methods to be equivalent for this purpose and does not require any correction factor to be applied.

Environment Protection Authority
PO Box A290 Sydney South NSW 1232 Australia
59-61 Goulburn Street Sydney NSW 2000
Telephone 61 2 9995 5000
Facsimile 61 2 9995 5999
ABN 43 692 285 758
www.epa.nsw.gov.au

In relation to your specific request for advice about how to proceed in relation to the Cross City Tunnel and the Lane Cove Tunnel, it is noted that the approval conditions for both of these projects clearly specify that there are two methods of measuring of ambient air quality that are acceptable (specifically these are the TEOM method or the high volume sampling method). The approval conditions did not envisage the use of correction factors for these projects and nor would the EPA recommend their use without further debate about the efficacy of such a move.

Should you wish to discuss any aspect of this letter please do not hesitate to contact Ross Carter, Executive Director Sydney Region on 02 9995 6800.

Yours sincerely

Lisa Corbyn

LISA CORBYN
Director General

g) HAIRS refers to Dr. Best who stated *" correction factors should be applied to TEOM PM_{10}"*. Dr. Holmes's response is *". . . interesting but largely irrelevant."*

It is especially noteworthy that Dr Nigel Holmes discloses that he is a member of the National Environment Pollution Measure (NEPM) Peer Review Committee and also states he is familiar with the references quoted by Dr Best in relation to incorporating correction factors. It seems then that he changes his position to suit the personal and political surroundings and in doing so his reliability is questioned on the basis of conflicting statements.

The extraordinary fact is that his wife, Dr Kerry Holmes, of HAIRS and Dr Peter Best have in late 2002 produced a report to recommend correction factors. See below. Both are authors on a conjoint paper to be presented 23-27 November in the Clean Air Conference, Newcastle. It is difficult to believe that Dr Nigel Holmes is unaware of such developments. The only conclusion is that we see yet again clear evidence that patronage is the lifeblood of politics.

TEOM ADJUSTMENT FACTORS FOR A SUBURBAN ENVIRONMENT IN SYDNEY

Peter R Best1, Lena Jackson1, Jane Barnett2, Eloise Duguid2, Melissa Hart2 Kerry Holmes2

1Katestone Environmental, PO Box 2184, Toowong, Queensland, Australia

4066 2Holmes Air Sciences, Suite 2B, 14 Glen Street, Eastwood,

New South Wales, Australia 2122

TEOM instruments using heated inlets may underestimate PM10 levels inurban areas due to the loss of semivolatile secondary aerosols and organic compounds. Whilst temperature-dependent or seasonal adjustment factors have been suggested as suitable procedures to bring closer agreement between traditional gravimetric methods such as high volume air samplers and other measurement techniques, considerable variability may still occur within a given urban area. Detailed compositional measurements are rarely available in Australasian situations that can

provide a better approach for standardisation of TEOM or beta-attenuation techniques. Recent measurements at 2 sites in the M5 East tunnel air quality monitoring network (Sydney) allow reasonable seasonal factors to be defined but have much smaller adjustment factors than at a nearby EPA site. The implications for routine measurement campaigns and setting of project performance measures are discussed with reference to recent recommendations from Australian and European agencies.

(h) Dr. Holmes agrees with Dr. Best's assertion that if the stack is not properly designed,

the concentrations will be higher – *"but it is not up to Katestone to assume that the stack will be built with inadequate momentum buoyancy. In fact, it is quite mischievous to do so."* Again, Dr Nigel Holmes does not respond squarely as the same questions were raised by EPA that the RTA failed to respond via HAIRS.

28.) Lisa Mitchell (Planning) to Denise Wilson (EPA?).

John Betts (RTA) provides a detailed list of responses to questions from EPA.

These include responses to the Moore St Compound proposal. Reference is made to the 'Red Crowned toadlet' as not being affected by the site damage. The RTA regards the Moore St bushland as "a degraded environment" and would benefit by restoration after the tunnel is built.

29.) Penny Finlay (Planning) to J. Betts (date not shown)

This is a 3-page response from HAIRS. The EPA alleges HAIRS provide results for one stack configuration and location, the details of which are not provided. EPA also claim HAIRS,2002 fails to recommend an optimum stack location, height and minimum exhaust velocity.

30.) Lisa Mitchell (Planning to J. Betts (RTA) 1.7.02

This document provides details of questions being sought further from the RTA by Planning. Some issues relate to the Moore St Compound.

31.) J. Woodward (EPA) provides to the Board, options to regulate motorway tunnels and ventilation stacks - 4.11.02.

It is noteworthy the EPA makes the following comment:" Once constructed (tunnel) it is usually not feasible to make changes to the project that were not allowed for in the original design"

- NSW Health recommended that additional goals be applied to the CCT and LCT projects based on exceedances of CO levels in the M5East.
- Note the following comment from EPA "There is considerable concern about the haze level in the M5East tunnel and its implication for safety and health. The haze within the tunnel consists primarily of particles from vehicle exhaust emissions particularly from diesel-engine vehicles. Minimum levels of visibility are required for the safe operation of the tunnel and this is one of the factors used to determine the minimum ventilation rate. Visibility levels that meet these safety requirements nevertheless can result in a clearly visible haze within the tunnel."
- " The EPA playing a more upfront role may risk removing pressure for the RTA to respond to the community in these situations"
- *" Penalty clauses that require the proponent to provide significant funds for local air quality initiatives for each day that in-tunnel and/or stack limits are exceeded. These measures will provide significant financial incentive to ensure that the "teething" problems experienced with the M5East are avoided".*
- *"The primary options for the EPA to increase its role in regulation of motorway tunnel is to use the powers of the Protection of the Environment Act either as the appropriate regulatory authority or through licensing the operation of the tunnel under the Act..... .....If the EPA takes on a larger role in regulating the operation of these projects there is the risk that the design assessment and approval process may be compromised by the presumption that the EPA will be able to solve any shortcomings once the motorway is in operation"*

Note by RK: Yet again the EPA behaves as though impotent to make change. Instead it clearly wants to defer to the RTA and 'pass the buck'.

MEMO

To: Jay Stricker
General Manager, Environment & Community Policy Branch

From: Michael Najem
Manager, Environment & Property

Subject: Lane Cove Tunnel – Submission from EPA in response to Representations Report

Jay

I refer to our discussion in relation to the letter from the EPA dated 5 September 2002 attaching a copy of a letter dated 30 August 2002 from the EPA to Planning NSW in response to the Representations Report for the Lane Cove Tunnel.

The letter from the EPA relevantly states that:

- the EPA's response to the Representations Report is "an interim response."
- there are a number of air quality and noise related issues that require resolution "prior to the EPA finalising its determination of the project."
- these issues need to be resolved "to enable the approval process to proceed".

The letter from the EPA to Planning NSW dated 30 August 2002 relevantly states that:

- the EPA wants an opportunity to review the draft conditions of approval under Part 5 of the *Environmental Planning and Assessment Act* 1979 ("**EP&A Act**") before they are finalised;
- in the Representations Report, the RTA identified the EPA's comments in Appendix B as correspondence rather than an EIS submission and did not directly address the majority of the environmental issues raised by the EPA. This is said to raise concerns about "the transparency of the environmental assessment process, and the adequacy of the Representations Report to clearly demonstrate to the public how environmental issues have been addressed";
- air quality remains the principal operational phase environmental concern. The EPA is unable to assess the predicted air quality impacts in the absence of "outstanding information requirements";
- noise management, especially at the Moore Street works compound, and excavation spoil and water quality management, remain the principal construction phase concerns. The environmental impacts associated with the construction of the Tunnel are manageable to acceptable levels; and

- the EPA awaits the outstanding information in relation to the air quality issues "so that we can determine whether or not the EPA can issue an Environmental Protection Licence for the construction of the motorway".

The following are my comments on the EPA's correspondence:

1 The EPA is a determining authority for the project under Part 5 of the EP&A Act as it will need to grant an Environmental Protection Licence for the construction of the project.

Tollway construction is a scheduled activity under the *Protection of the Environment Operations Act* 1997 ("**POEO Act**"). Accordingly, the RTA will need to apply for and obtain an environment protection licence from the EPA. The RTA does not require a licence for the operation of the tollway. This is confirmed by the EPA in its letter dated 31 December 2001 commenting on the EIS (Attachment, Section 2).

The EPA states that it is awaiting outstanding information in relation to air quality issues so that it can determine whether or not the EPA can issue an Environmental Protection Licence "for the construction of the motorway". However, in its submission to Planning NSW, the EPA confirms that the environmental impacts associated with the construction of the Tunnel "are manageable to acceptable levels."

The "outstanding information" relates to the predicted air quality impacts which the EPA identifies as the "principal operational phase environmental concern."

Accordingly, as the "outstanding information" is only relevant to the operational phase and given that the EPA has already confirmed that construction phase environmental impacts are manageable, the EPA has already confirmed that it can issue an Environmental Protection Licence for the construction of the project. There is, therefore, no reason why the EPA's concerns relating to the predicted air quality impacts should delay the Part 5 approval process or the discharge of the EPA's statutory functions.

The EPA's role as a determining authority under Part 5 is to take into account to the fullest extent possible all matters affecting or likely to affect the environment by reason of the EPA granting an Environmental Protection Licence to enable the activity to be carried out.

The fact that the EPA may consider that some environmental issues have not been resolved to its satisfaction does not preclude the RTA seeking the Minister's approval for the project. The EPA can seek clarification on any issues which it considers to be outstanding at the time that it determines whether to grant an Environmental Protection Licence to enable the activity to be carried out.

Having made a submission in response to the EIS, it is a matter for the Director-General of Planning NSW and ultimately the Minister, to consider the issues raised by the EPA and to determine whether to approve the activity and, if so, what appropriate conditions to impose on the approval.

There is no statutory provision under Part 5 of the EP&A Act which makes it necessary for the EPA to be satisfied that all environmental issues (relevant to its functions) have been resolved before the RTA can seek the Minister's approval for the project.

This view has been confirmed by Brian Preston SC.

2 As you are aware, there is no statutory provision for submissions in response to Representations Reports. I note that the EPA refers to its submission as being "an interim response".

3 The EPA does not need to resolve operational air quality issues "prior to ... finalising its determination of the project". The EPA's role as a determining authority relates only to construction phase issues. Air quality issues are only relevant to the extent that construction work on the project may affect air quality.

4 There is no statutory basis for the EPA seeking to review the draft conditions of approval under Part 5 of the EP&A Act.

5 In relation to the particular issues raised by the EPA in response to the Representations Report, I make the following comments on the issues which you identified as being of particular concern:

General Environmental Management – Schedules and Reporting

In terms of the EPA's statutory functions under the POEO Act, there is no reason why the "complaints register" referred to on page 7.23 of the Representations Report should be made publicly available on the project web site "to enable the EPA to determine the nature of the complaint, the action taken in response to the complaint, and who was responsible for the action." Any complaints relevant to the EPA's statutory functions would be required to be provided to the EPA pursuant to the usual conditions of the Environmental Protection Licence.

In any event, environmental performance monitoring was covered in the EPA's comments of 31 December 2001 on the EIS and recommendation 2.1 "That the proponent commit to establishing independent monitoring and reporting of environmental performance against EIS commitments (as amended by consent conditions and environmental protection licence conditions) as part of the project's management decision-making process".

Air Quality Impact Assessment

In relation to air quality impact assessment, stack emission concentrations and load limits, and stack exhaust velocity, the EPA raised concerns in relation to the adequacy of the assessment of these operational issues in its submissions in response to the EIS and made appropriate recommendations (see section 3.2). Holmes Air Sciences prepared a Lane Cove Tunnel Air Quality Study: Preliminary Responses to Preliminary Submission from NSW EPA (5 April 2002) in order to address these issues.

Tunnel Ventilation System Design and Management

The EPA states that a detailed analysis should be prepared to identify and eliminate any conflicts in the integration of tunnel ventilation design and operation, incident response triggers and procedures, and traffic management.

The EPA raised these operational issues in its submissions in response to the EIS (see section 3.2.5).

Given that the above issues were previously raised by the EPA in response to the EIS and dealt with as part of the Representations Report, there is little point in the EPA raising the issues again in its submission on the Representations Report. There has to be finality in such submissions. The appropriate legal position is for the EPA to now leave these issues (including any suggestion that

the EIS may have inadequately dealt with the issues) for consideration by Planning NSW and the Minister.

The fact that the EPA is still not satisfied with the information provided by the RTA on what are clearly operational issues, is no basis for delaying the approval process under Part 5.

Michael Najum

Major, Environmental & Property.

2013 Federal Senate Standing Committee Inquiry

'The impacts on health of air quality in Australia'

Declaration

This Response has been undertaken with the best of my ability and knowledge, based on materials, documents available and current information, as well as over 20 years involvement with air quality and health-impact issues of traffic tunnels (e.g., Lane Cove Tunnel, M5 East Tunnel and Cross City Tunnel) in Sydney from their earliest beginnings. I have appeared in no fewer than five NSW Parliamentary Inquiries and a contributor to the 2008 NH&MRC Report http://www.nhmrc.gov.au/_files_nhmrc/publications/attachments/eh42.pdf - all related to the health impacts of air pollution e.g., arising from unfiltered vehicle tunnels.

Its presentation is true and does not, by its presentation of information or omission of information, materially mislead or intend to materially mislead.

Ray Kearney PhD, OAM

Date: 6th March, 2013

Hon. Assoc. Professor (Retired)
Dept. Infectious Diseases & Immunology
The University of Sydney

2013 Federal Senate Standing Committee Inquiry

'The impacts on health of air quality in Australia'

Terms of Reference:

http://www.aph.gov.au/Parliamentary_Business/Committees/Senate_Committees?url=clac_ctte/air_quality/tor.htm

The impacts on health of air quality in Australia, including:

(a) particulate matter, its sources and effects;

(b) those populations most at risk and the causes that put those populations at risk;

(c) the standards, monitoring and regulation of air quality at all levels of government;

(d) any other related matters.

For further information, contact:

Committee Secretary
Senate Standing Committees on Community Affairs
PO Box 6100
Parliament House
Canberra ACT 2600
Australia

Phone: +61 2 6277 3515
Fax: +61 2 6277 5829
Email: community.affairs.sen@aph.gov.au

Table of contents

Page

Summary 4
Preface 8
Terms of Reference – 1. Particulate matter, its sources and effects 11
- Table. Comparisons of ambient fine and coarse mode particles 11
- Importance of Particle Size 12
- Case Study - CSIRO flawed report 13
- Scientific misconduct 14
- Exhaust particles in 'Fine Mode' provide a formidable large surface area 15
- Plume trajectory 16
- Do PM_{10} Measurements Apply to Emissions of Motor Vehicles? – *No!* 16
- Using Air Quality Goals as a License to Pollute 18

Terms of Reference – 2. Those populations most at risk and the causes that put those populations at risk 18
- Table. PAH's in particulate and gas phases of vehicle tunnel 19
- Table. Substances in Diesel Exhaust listed as Toxic Air Contaminants 20
- Particles – size, numbers and surface areas 20
- Who is most at risk? 21
- PM weight measures is inappropriate in evaluation of biological effects of particles 21
- Pollutants interact with allergens 21
- Environmental Impact Statements (EIS) are deficient 21
- EIS reports do not take account of cumulative effects 21
- Most health impacts occur below the standard 22
- WHO challenges world to improve air quality 22
- Health impacts from short-term exposure during peak-hour are hidden 22
- Adverse impacts on health and well-being 23
- Figure. Lung and Heart Relationships in Gas Exchange 23
- Figure. Normal Alveolus and Effect of Acute Inflammation 23
- Particulate air pollution and blood 24
- Heart attacks and short-term exposure to fine particles 24
- Pollution increases risk of heart disease in women 24
- Older adults are at increased risk of being hospitalized from exposure to fine-particles 24
- Exposure to air pollution linked to heart disease 24
- Causes that put people at risk - Most diseases including cancer and heart attacks are *multi-factorial* in induction and development 25
    - NSW Cancer Council's embarrassment 25
    - Celebrity 'experts' 25
    - Examples of the multi-factorial nature of cancer development. 26
        1. Inflammation 26
        2. Properties of melatonin including its anti-cancer effects 29
        3. Fluoride inhibits melatonin 31
        4. Radiation from phone base stations decreases melatonin 32
        5. Case example: Telstra upgrades mobile base station near a tunnel stack 39
        6. Cancer-risk already estimated to be up to 10-fold higher from stack pollution 41

Terms of Reference - 3 The standards, monitoring and regulation of air quality at all levels of government 45
- Flaws in Monitoring of Air Pollution 45

Terms of Reference – 4 Any other related matters 46
- 'Feelings' are treated as evidence of fact 46
- Citizen activists 46
- Endangered fungi threatened by diesel fumes 47
- War Against Cancer - Have We Lost Our Way? Cancers on the increase! 47
- Air-Pollution Odours and Health Effects 50
- Alcohol as a Fuel 52
- AMA backs mandatory use of ethanol in petrol on health grounds 53
- Highlights 55

Summary

1. Diesel exhaust is a mixture containing over 450 different components, including vapours and fine particles coated with organic substances. Over 40 chemicals in diesel exhaust are considered toxic air contaminants overseas. Exposure to this mixture may result in cancer, respiratory effects, and other health problems. Weight-for-weight diesel particles are more than 40 times as carcinogenic as tobacco smoke.

2. In June, 2012, the WHO declared **diesel fumes** to be a **Level-1 Human Carcinogen** i.e. proven evidence of carcinogenicity in human beings. http://www.iarc.fr/en/media-centre/pr/2012/pdfs/pr213_E.pdf

3. The United Nations defined the right to health in Article 12 of the International Covenant on Economic, Social and Cultural Rights in 1966. The Covenant guarantees the *"right of everyone to the enjoyment of the highest attainable standard of health".* Article 12.2 (b) comprises e.g., *"the prevention and reduction of the population's exposure to harmful substances such as radiation and harmful chemicals or other detrimental environmental conditions that directly or indirectly impact upon human health".*

Through ratification of international human rights treaties, Governments undertake to put into place domestic measures and legislation compatible with their treaty obligations and duties. Australia is in breach of the 'Declaration of Human Rights'!

4. Yet despite the volumes of evidence of health impacts of PM2.5 particles, the National Environment Protection Council (NEPC), has NOT implemented a STANDARD for carcinogenic Particulate Matter (PM) of 2.5µm or less (PM2.5). That only a 'guideline' is set is indicative of the overt influence of the Oil/Petroleum/Automobile cartels and their representatives/lobbyists as well as alleged NEPC's negligence – along with that of the various instruments of State and Federal Governments – Health, Environment, Energy, Roads & Transport, Planning etc! The reasoning it would appear is *'economic rationalism'* i.e., if the taxes and excise income exceeds the cost of health impacts on society and there is left-over money in Treasury's coffers then it is justified – but there is no morality!

Why is this so? As with the telecommunications industries:

> *"Oil and car industries have acted again and again to deceive regulators about the hazards of their products and have used their wealth to hamstring attempts by state and federal legislators to make laws that address such threats/hazards."*
>
> Terry Tamminen *'Lives per Gallon'* (2006)

5. Conclusions made by Morawska & Thomas (2000) in their study of the relation between fractional contribution of volume from different modes in the particle size distributions (and thus from different sources) to PM_{10}, $PM_{2.5}$ and $PM_{1,}$ are as follows:

"PM_{10} measurements** provide information almost entirely on particles generated from mechanical process. In an urban environment this could also mean particles resuspended by the vehicular traffic and mechanical wear and tear of the tyres, **but not on the emissions from motor vehicles."

***"$PM_{2.5}$ measurements** also provide information mainly on particles generated by mechanical process, but the contribution from combustion process (N + A) modes becomes significant. Thus interpretation of $PM_{2.5}$ data could become very complex in order to distinguish the contribution from different type sources. It follows that the application of this parameter as bases for standards may not adequately facilitate control of particle emissions and concentrations."*

*"**PM_1 measurements** provide very good information about contributions from **combustion processes** and enable a much better distinction between combustion and **mechanically** generated aerosols. It would thus appear that the existence of PM_{10} and PM_1 standards would be most desirable from the legislation point of view."* (Morawska & Thomas, 2000).

A serious and fundamental defect in monitoring air pollution is the failure to take account of the fact that the relevant size of particles from combustion of fuel is within two peaks - 0.03µm and 0.1µm – excluded from most air-quality monitoring!

6. California's Scientific Review Panel has unanimously endorsed the official listing of diesel exhaust as a toxic air contaminant, due to its cancer and non-cancer health effects. Australia is slow to follow!

7. For the same load and engine conditions, diesel engines exhaust 100 times more sooty particles than petrol engines. As a result, diesel engines account for an estimated 26 percent of the total hazardous particulate pollution (PM10) from fuel combustion sources in our air, and 66 percent of the particulate pollution from on-road sources.

8. Cleaner alternatives to diesel engines are readily available. Alternatives include electric, liquefied natural gas (LNG) or compressed natural gas (CNG) buses and trucks. For cars, in addition, alternatives include ethanol and 'biodiesel'. E10 (10% ethanol in unleaded petrol) is reported to reduce fine particles by a qualified 50%. Most E10 is under-blended as E8.

Diesel buses and trucks are important contributors to smog (ground-level ozone) and fine toxic soot, two pollutants that have recently come under increased scrutiny because of their important public health impacts. Purchasing alternative fuel vehicles will reduce smog and fine soot emissions considerably. For example, operating a natural gas bus instead of a new diesel bus is equivalent to eliminating the smog and soot from 17-55 passenger cars.

9. The health risk from diesel exposure is greater for children, the elderly, people who have respiratory problems or who smoke, people who regularly strenuously exercise in diesel-polluted areas, and people who work or live near diesel exhaust sources. Asthma is on the rise.

10. According to an expert estimate, lifetime exposure to diesel exhaust at the outdoor average concentration (2.2 micrograms per cubic meter ($\mu g/m^3$) may result in about one in every 2,000 people developing cancer due to this exposure. Some organisations e.g., NSW Cancer Council and 'experts' down-play the importance of diesel fumes as a cause of cancer – presumably because it undermines their campaigns and lobbying against "passive tobacco smoke" A moratorium on cancer research and inquiry into such publicly funded cancer societies are warranted.

Cancer is a multi-factorial process involving initiation by a chemical, virus or radiation followed by 'promotion' such as dietary omega-6 fatty acids, reduction in melatonin (e.g., beta-blocker medications, fluoride and by radiation from base phone stations). Cancer prevention, therefore, should be a multi-pronged strategy.

The effects of long-term exposure to wireless technologies including emissions from cell phones and other personal devices, and from whole-body exposure to RF transmissions from cell towers and antennas is simply not known yet with certainty. However, the body of evidence at hand suggests that bio-effects and health impacts can and do occur at exquisitely low exposure levels: levels that can be thousands of times below public safety limits. Exposure to diesel fumes and emissions from cell phones and other personal devices and from whole-body exposure to RF transmissions from cell towers and antennas reduce melatonin and are likely to be synergistic or additive in causing health impacts.

11. The WHO has stated that for particle matter (PM), the PM_{10} is a 'marker' and there is no threshold below which there is no health impact. Nor are PM_{10} levels relevant for particles in tailpipe exhaust. The current 24-hour PM_{10} standard of 50µg/M^3 is set at limits for economic reasons and NOT for preventing health-risk. Further, professors Lidia Morawska and Michael Moore (2004) - of Queensland, have made the following profound statement:
"All of the studies available to us demonstrate that the primary determinant of the effect of ultrafine particles is their number and their surface area and not the weight of particles present. This means that the traditional use of PM weight measures is inappropriate in evaluation of the likely biological effects of ultrafine particles."
Found at: http://www.deh.gov.au/atmosphere/airquality/publications/health-impacts/index.html

12. 1000 particles of **1µm** are equivalent to one 10µm particle and have 10-times the surface area

- 1million particles of **0.1µm** are equivalent to one 10µm particle and have 100-times the surface area.
- 1billion particles of **0.01µm** are equivalent to one10µm particle and have 1000-times the surface area.
- More than 85% of particles in diesel exhaust are less than **1µm, peaking at 0.1 µm.**

13. Exhaust pollution including coarse, fine and ultra-fine particles, gaseous irritants, and polycyclic aromatic hydrocarbons (PAH's) either alone or in combination, are known to be associated with, for example:

- inflammatory lung diseases e.g., asthma, bronchitis and alveolitis
- increased cardio-vascular disease
- risk for exercise-induced heart damage
- limited blood flow and increased blood clotting
- increased mucous production and airway hyper responsiveness
- 1/5 lung cancer deaths (USA) and accelerated tumour growth
- premature death
- symptoms of anaemia e.g., tiredness, headaches, fatigue and shortness of breath.
- low birth weight and small head circumference of neonate.
- intra-uterine growth retardation (for each 10 nanogram PAH's /M^3 increase)
- certain leukaemias e.g., from exposure to benzene.
- loss in productivity, absenteeism from work and school.
- Increased sensitivity to bacterial products in airways
- Exacerbation of viral asthma

The effect is a major increase in sickness-care costs to the nation's health budget. In France, a study showed 2/3 of health care costs due to pollution resulted when levels of pollution were below the national standard for Particulate Matter (PM), less than 10 micrometre in diameter, i.e., PM_{10} of 50µg/M^3/24 hours. According to NSW Health, some 1,400 people die annually from air pollution i.e., air pollution causes more premature deaths in NSW each year than road accidents. 2.3% of all deaths in Australia are attributable to air pollution.The annual health cost of air pollution to NSW is estimated at $4.7 billion.

14. The current economic and political system privileges corporate players and actually provides incentives for production of injury and disease rather than prevention i.e., the trade-off for 'economic growth' where profit is generated by shifting costs of health impacts to the taxpayer. Whilst diesel fumes are a known cause of lung cancer, health bureaucrats state *"we have yet to understand the underlying mechanism."*

This is the classic risk-based approach. Use uncertainty as an excuse to delay. Remember tobacco and asbestosis? Precaution is not (yet) fashionable while risk-assessment is!
If a substance is known to be harmful, it should not be necessary to demonstrate 'scientifically' that it is actually causing harm before doing something about it.

15. The opening of the Lane Cove Tunnel resulted in a number of complaints from residents about air-pollution **odour**. The implication being that this is associated with 'groundstrike' by fumes of unfiltered tunnel pollution from the tunnel's exhaust stacks. The same experience continues to be reported in 'odour diaries' by residents affected by toxic fumes from the M5 East stack. In the past, unpleasant environmental odours have been considered warning signs or indicators of potential risks to human health but not necessarily direct triggers of health effects. The latter assumption has now changed because certain environmental malodours have now been shown to trigger health symptoms.

Heightened symptomatic responses to odours are well documented in two medical conditions – pregnancy and asthma. The majority of women report nausea and vomiting in the first trimester of pregnancy. Odours (e.g., household, food and industrial chemicals) can act as triggers of nausea and vomiting during this period. For asthma, Shim and Williams (*Amer.J Med.* 1986; vol. 80, p18-22) found that 90% of a group of 60 asthmatics surveyed reported exacerbations of asthma in relation to odour exposures, and nearly 40% had visited emergency rooms after such incidents. On repeat testing with a placebo (saline), the results of abnormal lung function in the asthmatics were not affected. Several separate studies have shown that exposure to odours by asthmatics, whose skin prick-testing confirmed a lack of immunological reaction, could provoke asthmatic attacks. Therefore, individuals with odour-triggered respiratory symptoms or 'sensory hyper reactivity' should not be assumed to have asthma, but rather should be considered in terms of a broader differential diagnosis.

16. Regarding the question of filtration in stacks and tunnels there is clearly a need for Governments to apply **honesty** as well as **objectivity** to the **appraisal of the technologies** as well as to the **scientific and medical evidence for health risk.** At the moment, Governments and the statutory authorities are dickering about **on the margins of a duty of care** and an endless and irrelevant discussion about whether or not more research is needed to be undertaken. The end result, to date, is a patronising **'do-nothing' outcome!** The **totality of the evidence** is, beyond reasonable doubt, in favour of installing filtration and makes it **obligatory** for Governments, to **unanimously endorse** the installation of filtration technology in tunnels and/or in stacks as a **responsibility** and a '**duty of care'** – as endorsed by the Australian Medical Association.

17 Recently, mycologists brought to the attention of Lane Cove Council an alarming observation referred to as *'Rosecomb'* (abnormal gills – due to diesel toxicity) in protected *Hygrocybe reesiae* and similar malformations in other endangered fungi. The analogy is thalidomide teratology. Are these epi-genetic effects an additional 'wake-up' call to draw attention to the poisoning of human beings and our life-support systems?

18. Government/consultant Air Quality Reports fail to respond to the results of research that confirms there is ***no safe threshold level of particulate exposure.***

The lack of an identifiable safe threshold level for particulate exposure points to the need to reduce ambient particulate concentrations to as low a level as practical.

The 24 hour **averages** of PM_{10} do not identify *short-term pollution sources* e.g., a.m. and p.m. peak periods.

19. The multi-layered, utterly immoral, petroleum cartel has become institutionalized, having "got government off its back". The Australian Government must be more aggressive in taking on the staggeringly profitable and tax-favoured big oil companies. As with Big Tobacco it is time for the community to initiate Class Actions against the oil cartels for the sickness and death they have afflicted!

20. Today, when ordinary citizens and others rise up in anger and hope, they have power to defy governments and focus debate by politicians. Such moments are upon us now to bring change for good. In the words of the *'Desiderata'* (1927) - Latin: "desired things" - written by Max Ehrmann: *"You are a child of the universe no less than the trees and the stars; you have a right to live ..."* The poem is a list of things desirable in life - technically, things considered necessary or highly desirable or something lacking and wanted. Sustainability! The poem's simplicity and affirmation of life resonate more than ever.
http://www.fleurdelis.com/desiderata.htm

Preface

Free access to clean fresh air and water of acceptable quality is a fundamental necessity and a *human right*.

The Preamble to the World Health Organisation's (WHO) constitution declares that it is one of the fundamental rights of every human being to enjoy *"the highest attainable standard of health"*. The right to health is not to be understood as a right to be *healthy*. The right to health contains both freedoms and entitlements. The *entitlements* include the right to a system of health protection which provides equality of opportunity for people to enjoy the highest attainable level of health.

In June, 2012, the WHO declared **diesel fumes** to be a **Level-1 Human Carcinogen** i.e., proven evidence of carcinogenicity in human beings. http://www.iarc.fr/en/media-centre/pr/2012/pdfs/pr213_E.pdf

Australia continues to breach The Universal Declaration of Human Rights http://www.un.org/en/documents/udhr/index.shtml (Article 25) by allowing its citizens to be exposed to the carcinogenic fumes of diesel, despite the Government knowing the dangers. This is similar to deliberately exposing servicemen to the radiation of a nuclear bomb test at Maralinga 61-years ago – again, despite government knowing the dangers!

The United Nations further defined the right to health in Article 12 of the International Covenant on Economic, Social and Cultural Rights in 1966. The Covenant guarantees the *"right of everyone to the enjoyment of the highest attainable standard of health"*. Article 12.2 (b) comprises e.g., *"the prevention and reduction of the population's exposure to harmful substances such as radiation and harmful chemicals or other detrimental environmental conditions that directly or indirectly impact upon human health"*.

Through ratification of international human rights treaties, Governments undertake to put into place domestic measures and legislation compatible with their treaty obligations and duties.

The New South Wales Court of Appeal recently dismissed the appeal of a particular employer and relied on the High Court's statement in Southern Shire Council v. Heyman (1985) that: *"when there is a duty to take a precaution against damage occurring to others... breach of the duty may be regarded as materially causing or materially contributing to that damage, should it occur, subject of course to the question of whether performance of the duty would have averted the harm."*

It is well known that levels of cancer, neurological disease (e.g., dementia), respiratory disease (e.g., asthma) and infertility have increased dramatically over the last century, in

the latter half especially. Is this just co-incidence or is there a correlation between disease, poor health and the prevalence of toxic chemical contamination of our life-support systems – air, water, food and land?

Already we witness this in action in Australia. For example, for decades, we have known that the combustion of fossil fuels e.g., ***petrol and diesel*** yields highly toxic particles that are predominately *ultra-fine* (about 0.03 micrometres - µm - in aerodynamic diameter), *soluble* and carry *toxic and carcinogenic chemicals* e.g., polycyclic aromatic hydrocarbons (PAHs).

It is emphasized that in June, 2012, the WHO declared **diesel fumes** to be a **Level-1 Human Carcinogen** i.e. proven evidence of carcinogenicity in human beings.
http://www.iarc.fr/en/media-centre/pr/2012/pdfs/pr213_E.pdf

Yet despite all this and the volumes of evidence of health impacts of PM2.5 particles, the dickering around for over 2 decades by the National Environment Protection Council (NEPC), has NOT led to the implementation of a STANDARD for carcinogenic Particulate Matter (PM) of 2.5µm or less (PM2.5). That only a 'guideline' is set is indicative of the overt influence of the Oil/Petroleum/Automobile cartels and their representatives/lobbyists as well as alleged NEPC's negligence – along with that of the various instruments of State and Federal Governments – Health, Environment, Energy, Roads & Transport, Planning etc! The reasoning it would appear is *'economic rationalism'* i.e., if the taxes and excise income exceeds the cost of health impacts on society and there is left-over money in Treasury's coffers then it is justified – but there is no morality!

Why is this so? As with the telecommunications industries,

> *"Oil and car industries have acted again and again to deceive regulators about the hazards of their products and have used their wealth to hamstring attempts by state and federal legislators to make laws that address such threats/hazards."*
>
> Terry Tamminen *'Lives per Gallon'* (2006)

A 'guideline', unlike a 'standard' is legally unenforceable! This favours the oil cartels and vehicle manufacturers. Consequently, the function of the transnational corporations (oil, pharmaceuticals, agribusiness, car manufacturers etc) is not to promote a healthy ecology, but to extract as much marketable value out of the natural world as possible, even if it means treating the environment like a septic tank. Profit is the name of the game! Indeed, the 2009 documentary *The Idiot Cycle* claims that certain chemical manufacturers, including oil cartels are profiting from the production of cancer-causing products and then some of the same companies are investing in profitable cancer treatments - *making pollution itself a cash-cow.*

Though ratifying international human rights treaties, the Australian Government has FAILED to undertake to put into place domestic measures and legislation compatible with their treaty obligations and duties e.g., "Article 25: *Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family...."*

Public health experts fear global trade agreements and powerful transnational companies continue to create a boom industry in death and disease. Like the tactics of Big Tobacco, the Oil Cartels also seek to augment their profits at the expense of people's lives – through aggressive marketing and lobbying. The problem is that people are not being represented ethically and honestly by their politicians and bureaucrats. People feel powerless, manipulated and betrayed!

It is no longer a level playing field when it comes to making healthy choices! Society is saturated by advertising, covert marketing and sponsorships! Researchers are being bought off! We are

dominated by blatant and sophisticated lies! The deceitful mantra *"Ethanol damages engines"* from the oil cartels helps account for the 30% increase in sales over the last three years of vehicles powered by *carcinogenic diesel*! Such companies should no longer be given a free place at the table when it comes to negotiating a public health response to the growing health impact of air pollution.

'Globalization' is too often confused with a beneficial notion of genuine mutual interdependence and cooperation between nation states – but in reality it clearly is not. In an effort to maintain profit margins, here and abroad public assets are plundered, human life trampled upon as well as the environment destroyed. In secret negotiations behind closed doors, the Trans-Pacific Partnership (TPP) Agreement involving Australia is a global economic coup that will redefine the terms of globalization in a way that completely resets the social contract in favour of corporate right rather than human rights. The TPP will allow corporations to sue nations if *laws such as those* ***protecting the environment*** *interfere with corporate profits*. How are we not to sit back and see our health and biodiversity hollowed out?

It is hoped that this Senate Committee Inquiry will not emulate all the numerous previous similar meetings, task forces, parliamentary inquiries, government reviews etc, etc that have come to essentially nothing to allow *health impacts of air pollution to continue as 'business as usual'!*

Terms of Reference – 1. Particulate matter, its sources and effects

Table 1. Comparisons of ambient fine and coarse mode particles

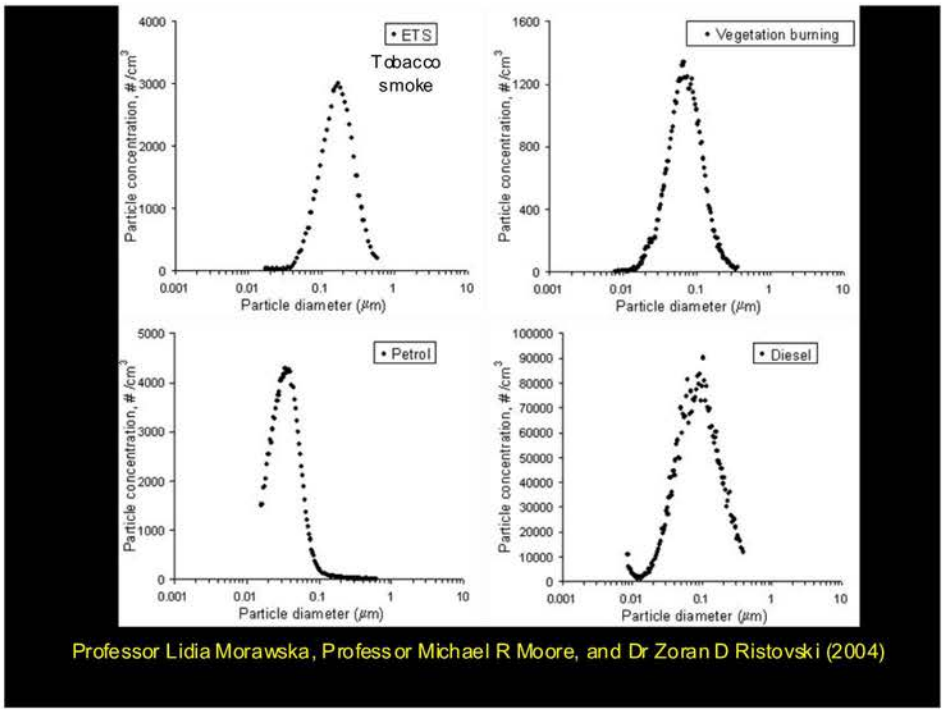
	Fine Mode (<PM 2.5)	Coarse Mode PM10
Formed from:	Gases	Large solids/droplets
Formed by:	Chemical reaction; nucleation; condensation; coagulation; evaporation of fog and cloud droplets in which gases have dissolved and reacted.	Mechanical disruption (e.g. crushing, grinding, abrasion of surfaces); evaporation of sprays; suspension of dusts.
Composed of:	Sulphate, $SO_4^{=}$; nitrate NO_3^-; ammonium, NH_4^+; hydrogen ion, H^+; elemental carbon; organic compounds (e.g., PAHs); metals (e.g. Pb, Cd, V, Ni, Cu, Zn, Mn, Fe); particle-bound water.	Resuspended dusts (e.g., soil dusts, street dust); coal and oil fly ash, metal oxides of crustal elements (Si, Al, Ti, Fe); $CaCO_3$, NaCl, sea salt; pollen, mould spores; plant/animal fragments; tire wear debris
Solubility	Largely soluble, hygroscopic and deliquescent	Largely insoluble and non-hygroscopic
Sources	Combustion of coal, oil, gasoline, diesel, wood; atmospheric transformation products of NO_x, SO_2 and organic compounds including biogenic species (e.g. terpenes) high temperature processes, smelters, steel mills, etc.	Re-suspension of industrial dust and soil tracked onto roads; suspension from disturbed soil (e.g. farming, mining, unpaved roads); biological sources; construction and demolition; coal and oil combustion; ocean spray
Lifetimes	Days to weeks	Minutes to hours
Travel Distance	100s to 1000s of kilometres	< 1 to 10s of kilometres

http://www.who.int/environmental_information/Air/Guidelines/Chapter2.htm

1(a) Importance of Particle Size

A serious and fundamental defect in monitoring air pollution is the failure to take account of the fact that the relevant size of particles from combustion of fuel is within two peaks[1] - 0.03µm and 0.1µm. Neither of these particle sizes (mass or number) is measured in any of the routine Air Quality surveys. Why? NEPC has not seen fit, in their alleged negligence, to set a *standard* for PM2.5 or less – only a 'guideline'.

See also diagram below.



Morawska &Thomas[2] report that only 3% of combustion particles between 0.1µm and 1µm are present in PM_{10} measurements. Despite this research conducted for the Queensland Environment Protection Agency, the RTA continues to claim that PM_{10} measures all particles less than 10µm in size. Monitoring by NSW EPA excludes most particles 1µm and less. About 90% (by mass) of diesel particulates[3] are less than 1µm and are missing in the PM_{10}/M^3 measurements in most EIS Reports. As a consequence, PM_{10} measurements of air quality and those of air-streams vented from tunnel stacks are seriously under-estimated.

Morawska & Thomas[4] concluded: "*PM_{10} measurements provide information almost entirely on particles generated from mechanical processes. In an urban environment, this could mean particles re-suspended by vehicular traffic and mechanical wear and tear of tyres**, but not on emissions of motor vehicles.***"

---

[1] Seaton Anthony, *Particles in the air: the enigma of urban air pollution*, Journal of the Royal Society of Medicine, Vol 89(11), pp 604-607, November 1996.

[2] Morawska Lidia, Thomas Stephen, *Modality of ambient particle distribution as a basis for developing air quality regulations.* 15th International Clean Air & Environment Conference, Sydney, Nov. 2000, Vol 1 pp 432-437.

[3] Brown S. et al, *Emission profile of the Australian diesel fleet project 2-2 of DNEPM preparatory work* 15th International *Clean Air & Environmen*t Conference Sydney, November 2000, Vol. 2.

[4] Morawska. Op cit.

Therefore, if the PM_{10} measurement is not an instrument for evaluating traffic emissions, the air pollution data and the calculated health-risks are also underestimated. The above authors conclude that PM_1 measurement provides very good information about contributions from the combustion engine, and distinguishes it from suburban background.
The fact that PM_1 contributions are about two-fold greater in traffic aerosol than in ambient air[5] is a serious deficiency in pollution monitoring by the RTA. Use of PM_{10} data serves to hide exceedances of air quality standards. By using PM_{10} measurements, the bulk of tail-pipe particulates are excluded and what is analysed is mainly re-suspended dust from the road surface[6]. The exclusion of combustion particles suppresses data of the enormous surface area (> 100 fold) of toxic respirable particles missing from PM_{10} measurements.
Several overseas countries have a standard for PM_{10} and $PM_{2.5}$. Australia has only now introduced a 'guideline' for $PM_{2.5}$ additional to a standard for PM_{10}. It is misleading to imply PM_{10} is stringent and includes all particles as fine as $PM_{2.5}$ and PM_1.

A major flaw in monitoring pollution from tunnel stacks is that the fine particulate matter of less than one micrometre (<PM_1), representing 90% of particulate pollution from vehicle exhaust is excluded by the measuring devices (Tapered Element Oscillating Measure –TEOM) used, to date, in the monitoring PM10.

1 (b) CASE STUDY: Example of how the air-quality guidelines and standards *are abused* is found by CSIRO's Study Report (2012) commissioned by NSW Government to assess the efficiency of a 'trial filtration study' of the M5 East traffic tunnel in Sydney.

CSIRO REPORT
http://www.rta.nsw.gov.au/roadprojects/projects/building_sydney_motorways/tunnel_air_quality/m5_east/project_documents.html

CSIRO Executive Summary
1. Only 0.5 -2.5 μm particles were measured (**Excludes particles from tail-pipe**, see graphs above).
2. 'More research' – typical CSIRO recommendation for self-serving research funding when answers to tabulated questions are already known from overseas experience. Compare to CSIRO's bio-ethanol government-funded research to "Test ethanol fuel E10 under *Australian* conditions"! The benefits of E10 were already known from overseas research!

CSIRO Report:
1. On p11 CSIRO confirms particles in tunnel are dominated by *"finer particle fraction"* – but **did not** measure them!
2. On p12, CSIRO seems to say that the instrumentation used was expected to measure down to 0.02 μm (20nm).
3. On p13, CSIRO chose an instrument with a size range from 0.5 μm – 20 μm. CSIRO state: *"Particles with diameters of less than 0.5um have **not been considered in this study** due to the diminishing contribution of particles less than 0.5 μm to PM10 and PM2.5."* Thus CSIRO used

[5] Morawska. Op cit.

[6] Ibid

[6] Kittleson D.B. *Engine & Nanoparticles: A Review*, J. Aerosol Sci., Vol. 29, No 5/6 pp 578-88, 1998.

[6] Kittleson D.B. *Recent Measurements of Nanoparticle Emissions from Engines,* Conference Current Research on Diesel Exhaust Particles – Japan Assoc. of Aerosol Science & Technology, Tokyo Japan, 9 Jan. 2001.

[6] Kittleson D.B. *Engine & Nanoparticles: A Review.* Op cit

equipment they KNEW was **inadequate** for proper measurements of the TOXIC fine fraction. CSIRO's statement is grossly misleading!
4. Why CSIRO were allowed to use irrelevant measurements etc. needs an answer.
5. Electrostatic Precipitators (ESPs) operate with efficiencies > 95% overseas. Why the assertion by CSIRO of "poor" filtration performance here? Is this common political patronage? CSIRO's conduct seems questionable! As a consequence, the community suffers!
6. What is needed is the filtration equipment be designed and built by credible and experienced overseas manufacturers.
7. The cost analysis is misleading. The CSIRO testing FAILS to account for the particle removal by filtration as per stack monitors. The filtration is more efficient than CSIRO calculated from selective 'fiddled' data in its flawed study. Who suffers from this alleged incompetence? The community!

Approximately 90% (by mass) of diesel particulate emission has a size less than 1μm (Brown *et al.,* 2000). NSW 'EPA' disclosed that its monitoring of atmosphere pollutants does **not** include those particles 1μm or less. (International Workshop on Tunnel Ventilation, June 2000). Therefore, the 90% of diesel emission is not included in the mass of PM_{10}/M^3 recorded in routine air-quality monitoring.

1(c) Scientific misconduct
In conventional scientific/medical research, investigators who publish results and *knowingly*:

- Derive them from the inappropriate application of methods;
- Fail to incorporate proper factors for valid readings;
- Skew the results to a pre-determined outcome;
- Remove data that are inconveniently high;
- Adopt standards that are known to be flawed or inappropriate:
- Deliberately mislead in the interpretation and analysis as well as in their data presentation, and
- Ignore the numerous, clear and specific directives in international expert advice to amend the study design for scientific stringency and methodological validity -

are deemed **incompetent**, or worse, judged to be guilty of **scientific misconduct** and treated harshly.

The flawed air quality assessment as well as the health-risk analysis of the tunnel emissions have consistently ignored independent professional advice, (e.g., Prof. Lidia Morawska (Q'land), air quality expert and adviser to WHO), that PM_{10} measurements, unlike PM_1, provide no information regarding vehicle emissions that constitute the tunnel haze. Thus, standards set for the emissions e.g., of the Lane Cove Tunnel western stack (1600μg/M^3/ 30min.) relate **only** to PM_{10} and **grossly under-estimate** the actual particulate pollution. *Planning NSW* has also ignored the fact that the National Standards of regional air quality **do not apply to point source emissions** (stacks) or to tunnels as the standards do not measure the most harmful fine particles in vehicle exhaust.

The invalid PM_{10} data for measurements of traffic/industrial emissions implies the health risk "assessment" commonly undertaken in Environmental Impact Statements/Studies (EIS) is also **grossly under-estimated and flawed**.

By using PM_{10} measurements, government/consultant Air Quality Reports exclude virtually the bulk of the constituent particulates arising from the tail pipe. This exclusion then totally fails to acknowledge the existence of the **enormous surface area** (> 1000 fold) of respirable particles that carry toxins.

Government/consultant Air Quality Reports fail to disclose the levels of pollution at 15 minute intervals i.e., that demonstrate major exceedances during a.m. and p.m. peak traffic periods. Such

exceedances are diluted by 24 hour averages and further diluted by annual averages on which health risk assessments are guessed.

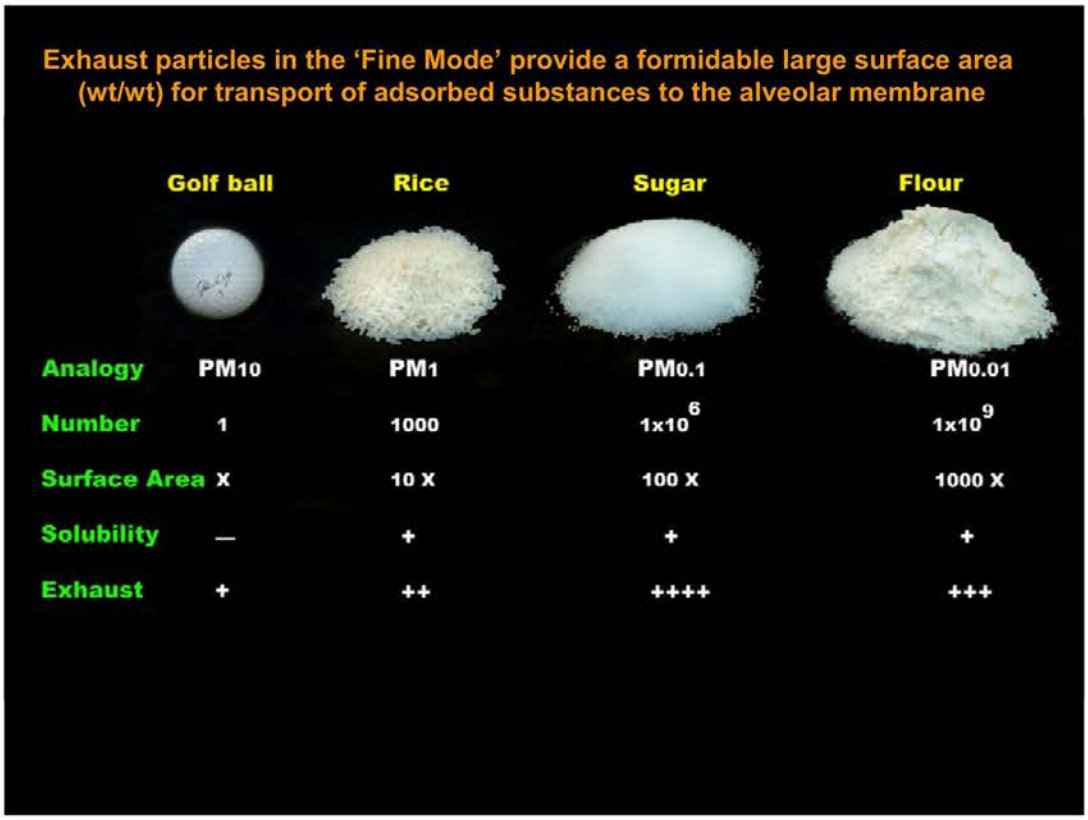
Contemporary risk management is about trying to get the levels as low as possible. We should not work up to a standard, we work down to a risk – that is not what has happened in this process. **A solution is to install filtration in the vehicle tunnel stacks in residential areas.**

Government/consultant Air Quality Reports fail to respond to the results of research that confirms there is ***no safe threshold level of particulate exposure.***

The lack of an identifiable safe threshold level for particulate exposure points to the need to reduce ambient particulate concentrations to as low a level as practical. This means that e.g., *NSW Planning* needs to acknowledge there are feasible, practicable and warranted measures to reduce toxic emissions in tunnels such as filtration of pollutants before leaving the stacks.

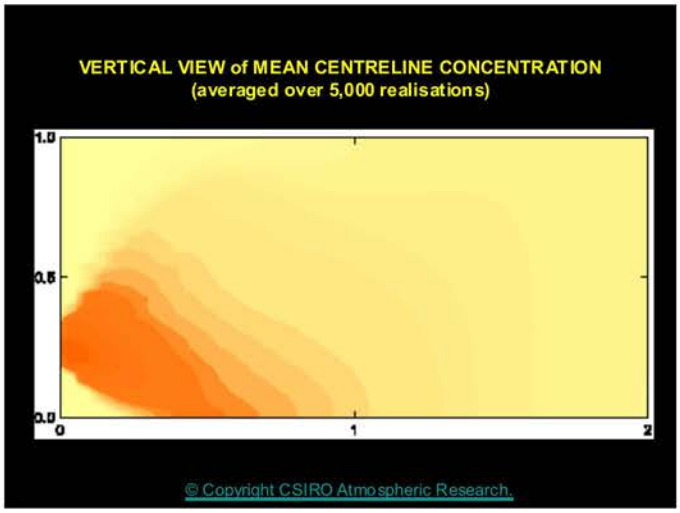
The 24 hour **averages** of PM_{10} do not identify *short-term pollution sources* e.g., a.m. and p.m. peak periods.

Government/consultant Air Quality Reports and e.g., the NSW Regulatory Authorities including *NSW Planning* fail to acknowledge that it cannot be acceptable to increase health risks to one population (e.g., exposed to emissions from a single 'unfiltered stack') on the grounds that another might correspondingly benefit from vehicle tunnels when only the PM_{10} mass/M^3 measurements are made.



Government/consultant Air Quality Reports fail to understand the *dynamics of pollution trajectories* from a stack. The following photo (LHS) has a cruise ship at Sydney's Darling Harbour discharging visible exhaust from a funnel. Superimposed is a photo of the Lane Cove Tunnel western stack (to scale). Note how the heavy particles 'fold downwards' from the point source.





The Top, RHS panel shows fallout of heavy particles in close proximity to a stack while light/fine particles remain in the air for days/weeks and travel 100's to 1000's of kms.

1 (d) Do PM_{10} Measurements Apply to Emissions of Motor Vehicles? – *No!*

Morawska and Thomas (2000) in their studies used the tri-modal nature of atmospheric aerosol number sizes and consistency as follows:

(a) **Nuclei**, N, (<0.1μm). These originate from the condensation of hot, highly supersaturated vapours released during combustion.

(b) **Accumulation**, A, (<1.0μm but >0.1μm). These arise from combustion through coagulation and heterogenous nucleation to accumulate the submicrometre aerosol mass in the accumulation mode

(c) **Coarse**, C, particle (>1.0μm). Almost all particles in the coarse particle mode originate from natural and anthropogenic mechanical processes.

Conclusions made by Morawska & Thomas (2000) in their study of the relation between fractional contribution of volume from different modes in the particle size distributions (and thus from different sources) to PM_{10}, $PM_{2.5}$ and $PM_{1,}$ are as follows:

*"**PM_{10} measurements** provide information almost entirely on particles generated from mechanical process. In an urban environment this could also mean particles resuspended by the vehicular traffic and mechanical wear and tear of the tyres, **but not on the emissions from motor vehicles."***

*"**$PM_{2.5}$ measurements** also provide information mainly on particles generated by mechanical process, but the contribution from combustion process (N + A) modes becomes significant. Thus interpretation of $PM_{2.5}$ data could become very complex in order to distinguish the contribution from different type sources. It follows that the application of this parameter as bases for standards may not adequately facilitate control of particle emissions and concentrations."*

> ***"PM_1 measurements*** *provide very good information about contributions from* ***combustion processes*** *and enable a much better distinction between combustion and* ***mechanically*** *generated aerosols. It would thus appear that the existence of PM_{10} and PM_1 standards would be most desirable from the legislation point of view."* (Morawska & Thomas, 2000).

Research shows that the 75% of the toxins, including carcinogens among the polycyclic aromatic hydrocarbons (PAH's), are carried on respirable particles less than 2.5μm i.e., particles not fully accounted for by air-quality reports/assessments based on PM_{10} air quality data.

Despite the fact that the standards in the National Environmental Protection Measures (NEPM) *do* ***not*** *apply to a point source emission*, but to a regional airshed e.g., Sydney all NSW Air-Quality Report for traffic tunnels ignore the NEPM guidelines and apply an inappropriate PM_{10} instrument for measuring emission pollution from the tunnel stacks.

Table 2 Fractional contribution of N+A and C modes to the volumes of PM_1, $PM_{2.5}$ and PM_{10}

Environment type	PM_1 % contribution (by mass)		$PM_{2.5}$ % contribution (by mass)		PM_{10} % contribution (by mass)	
	N+A	C	N+A	C	N+A	C
Traffic Influenced	82	18	14	86	3	97
Urban Influenced	47	53	10	90	< 1	> 99
Vegetation burning	100	0	84	16	37	63
Marine influenced	6	95	< 1	> 99	0	100
Modified background	84	16	12	88	< 1	> 99
Suburban background	38	62	1	99	< 1	> 99

From L. Morawska and S. Thomas (2000)

(a) **Nuclei**, N. (<0.1μm) These originate from the condensation and coagulation of hot, highly suspersaturated vapours released during **combustion.**

(b) **Accumulation**, A (<1.0μm but >0.1μm). These arise from combustion through coagulation and heterogenous nucleation to accumulate the submicrometre aerosol mass in the accumulation mode.

(c) **Coarse**, C, particle (>1.0μm). Almost all particles in the coarse particle mode originate from natural and anthropogenic mechanical processes.

1 (e) Using Air Quality Goals as a License to Pollute

The national pollution guidelines do not apply PM_{10} standards to point source pollution such as road tunnel vent stacks. This flaw in the standards enables the Regulatory Authorities to pump emissions from vent stacks in a concentrated, toxic plume that would far exceed the standards if it were measured at source. However, when these poisons are dispersed, they appear to have minimal effect on air measured several kilometers away (the regional airshed). The problem is that the Regulatory Authorities cannot guarantee that the poisons disperse before they fall to the ground. Modelling shows that certain wind conditions can cause them to fall to ground level quite close to the stack, well before "dilution" can occur.

PM_{10} 24-hour averages obscure or dilute the major unhealthy exceedances during peak or heavy traffic periods. The Regulatory Authorities seem to view air quality goals as a licence to pollute. If the standard is $50\mu g/M^3$, then they assume that 48 or to creep toward 50 is acceptable. In contrast, contemporary risk management principles demand that risk levels be reduced as far as possible. The Regulatory Authorities should not pollute up to a standard but work down to a risk. This principle is not adopted by the Regulatory Authorities generally.

Discharging tonnes of untreated toxic emissions into residential areas is intuitively illogical, especially when there is no safe threshold. In 1800, industry stacks belched clouds of pollution into the environment. Two hundred years later we cannot continue to use the atmosphere as a sink.

Terms of Reference – 2. Those populations most at risk and the causes that put those populations at risk

2 (a) The relationship between air pollution, death and disease has been studied for decades, leading to the consistent conclusion that combustion of diesel and petrol is among the most toxic sources of emissions today (USA Clean Air Task Force Report, Feb. '05) viewed at the link:
http://www.catf.us/publications/view.php?id=83
See also NH&MRC Report (2008) on Air Quality Around Tunnels – link:
http://www.nhmrc.gov.au/guidelines/publications/eh42
These exhausts contain numerous dangerous compounds, ranging from respiratory irritants to carcinogens including a host of air toxics, particulate matter, carbon monoxide and nitrogen oxides.

PAH Concentration (ng/m^3). Distribution between the aerosol and gas phases (26/05/99)

Pollutants	Tunnel centre		Portal	
	Pat. PM 2.5	Gas	Pat. PM 2.5	Gas
Naphthalene	<	10669.3	<	2117.7
Acenaphthylene	<	614.3	<	156.8
Acenaphthene	<	42.0	<	15.7
Fluorene	<	216.6	<	52.3
Phenanthrene	<	223.1	<	49.5
Anthracene	1.6	64.7	0.2	11.6
Fluoranthene	6.8	29.1	1.4	9.9
Pyrene	10.3	38.8	2.9	12.9
Benz(a)anthracene	16.2	<	2.0	<
Chrysene	19.4	<	2.3	<
Benzo(b)fluoranthene	13.3	<	2.8	<
Benzo(k)fluoranthene	13.6	<	2.2	<
Benzo(a)pyrene	17.1	<	1.9	<
Indeno(123cd)pyrene	12.0	<	1.6	<
Dibenz(ah)anthracene	1.6	<	0.3	<
Benzo(ghi)perylene	30.1	<	3.6	<
Total of 16 Pollutants	141.9	11898	21.1	2426

< = Less than limit of detection

Note: Several PAHs are known carcinogens and adsorb to FINE particles that are soluble.

From V. K. Dravitzki and I. A. Kvatch (2000)

The Table above documents the poly-cyclic aromatic hydrocarbons (PAHs) in the PM2.5 particulate phase and the gas phase of a NZ vehicle tunnel. The majority of PAHs e.g., di-methyl benzanthracene (DMBA), on particles, are proven carcinogens. DMBA is commonly used to induce breast cancers in experimental animals e.g., rats. PM2.5 particles are **soluble** in the lungs, off-loading their cancer-causing cargo.

The bulk of the PM2.5 particles have a mean diameter of about 0.1 μm of which at least 30% are deposited in the alveoli.

The scientific evidence is clear: diesel exhaust is a complex mixture comprised of hazardous particles and vapours, some of which are known carcinogens and others probable carcinogens. Diesel exposure poses a significant and avoidable increase in human health risks. Compelling evidence from dozens of well-designed studies supports the conclusion that diesel exhaust causes cancer. In addition, fine particles from diesel exhaust aggravate respiratory illnesses such as bronchitis, emphysema and asthma and are associated with premature deaths from cardio-pulmonary disorders.[1] The evidence of health effects is derived from extensive studies of human workers as well as some studies in animals, and observations of various kinds of mutagenic activity in culture systems.

1. Shprentz D, "Breathtaking: Premature Mortality Due to Particulate Air Pollution in 239 American Cities", NRDC, New York, May 1996, pp. 13-32.

Table 2: Substances in Diesel Exhaust Listed by Cal EPA as Toxic Air Contaminants

acetaldehyde	inorganic lead
acrolein	manganese compounds
aniline	mercury compounds
antimony compounds	methanol
arsenic	methyl ethyl ketone
benzene	naphthalene
beryllium compounds	nickel
biphenyl	4-nitrobiphenyl
bis[2-ethylhexyl]phthalate	phenol
1,3-butadiene	phosphorus
cadmium	polycyclic organic matter, including
chlorine	polycyclic aromatic hydrocarbons (PAHs)
chlorobenzene	and their derivatives
chromium compounds	propionaldehyde
cobalt compounds	selenium compounds
creosol isomers	styrene
cyanide compounds	toluene
dibutylphthalate	xylene isomers and mixtures
dioxins and dibenzofurans	o-xylenes
ethyl benzene	m-xylenes
formaldehyde	p-xylenes
Note: California Health and Safety Code section 39655 defines a "toxic air contaminant" as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health."	

http://www.nrdc.org/air/transportation/ebd/chap2.asp#table1#table1

2 (b) Particles - size, numbers and surface area

The very fine particles adsorb toxic gases and liquids onto their surfaces. On a weight basis, a billion ultra-fine particles are about equivalent to one coarse particle 10 micrometres in diameter (PM10), but have *1000 times the surface area.* The fine particles are mainly soluble and penetrate deep into the lungs. Health research indicates that the invisible exhaust may be the most dangerous of all. Technology exists right now to clean up emissions from these engines and to remove such toxics from road tunnels *by filtration*.

2 (c) Who is most at risk?

Most of the human studies on the health risks of diesel exhaust looked exclusively at healthy, adult men. To extrapolate from male worker studies to the general population may not adequately protect women, children, and the elderly. Furthermore, worker studies provide little information about health effects in people with chronic illnesses or depressed immune systems. We do know something about the susceptibility of some of these groups from research on the health effects of fine particle pollution.

Children are more susceptible than adults (except the elderly) to the adverse effects of air pollution because:

- Children are more active and breathe more rapidly.
- They have more lung surface area compared to their body weight and inhale more air kgm-for-kgm than adults.
- They have higher lung volume to body size, higher respiration rates and spend more active time in the polluted outdoor environment.
- When exposed to fine particles, children have slowed lung function growth, increased emergency room visits, increased incidence of asthma, bronchitis and crib death (CATF Report, Feb. '05).

2 (d) PM weight measures is inappropriate in evaluation of the likely biological effects of ultrafine particles

Queenslanders - Professor Lidia Morawska and Professor Michael Moore – writing in their excellent review found at:
http://www.deh.gov.au/atmosphere/airquality/publications/health-impacts/index.html
state under 'Toxicology':

> *"All of the studies available to us demonstrate that the primary determinant of the effect of ultrafine particles is their* ***number and their surface area*** *and not the weight of particles present .****This means that the traditional use of PM weight measures is inappropriate in evaluation of the likely biological effects of ultrafine particles****".*

2 (e) Pollutants interact with allergens

Studies have shown that pollutants such as exhaust particles can interact with allergens to amplify allergic reactions. Acutely high concentrations (e.g., a.m. and p.m. exceedances) of different pollutants can induce transient respiratory symptoms in asthmatic subjects.

Diesel emission of particulates (90% are not measured by current PM_{10} monitors) enhance allergic inflammation.

2 (f) Environmental Impact Statements (EIS) are deficient

Government/consultant Air Quality Reports and EIS's do not provide evidence of the size of the 'at risk' population (e.g., asthmatics, bronchitics, cardiac patients, children < 5 years). The extent to which a 'risk' population is not quantified e.g., in the stack precincts, it is impossible to undertake specific risk assessments, only guesses are offered to hoodwink a concerned community.

2 (g) EIS reports do not take account of cumulative effects

The failure to take account of *cumulative effects* on health is bewildering. At least 43% of inhaled particulates are retained in the lung and is associated with serious cumulative effects. An adult breathes 18 M^3 of air daily. Government/consultant Air Quality Reports and EIS's fail to provide a thorough and objective assessment of this matter. In the absence of certainty, the Precautionary Principle should be adopted.

2 (h) Most health impacts occur below the standard

Government/consultant Air Quality Reports fail to acknowledge that two-thirds of the health costs occur during days when particulate levels are less than $50\mu g/M^3$.

WHO challenges world to improve air quality

Dr Maria Neira, WHO Director of Public Health and the Environment stated:

"By reducing particulate matter PM_{10} pollution to 20 $\mu g/M^3$ as set out in the new guidelines, we estimate that we can cut deaths from air pollution by around 15% or 300,000 (of 2 million) deaths annually."

October, 2006

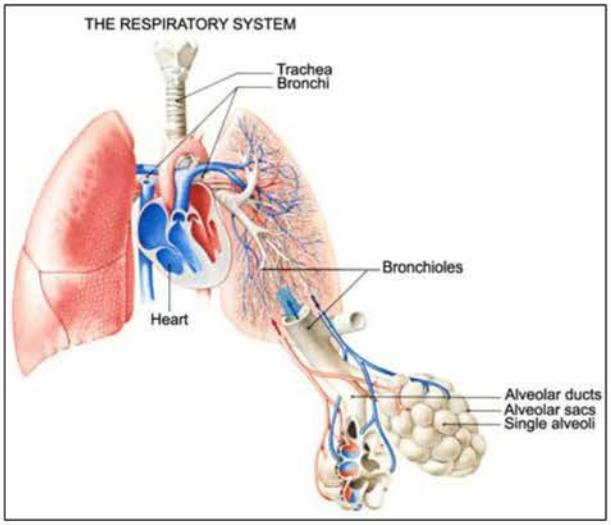
2 (i) Health impacts from short-term exposure during peak-hour are hidden

The 15-minute excursions in pollution levels during peak traffic periods that carry a 3-4 fold increase in health risk are hidden by PM_{10} averages. This is compounded by the fact that a.m. and p.m. peaks coincide with maximum pedestrian and residential exposure. Government/consultant Air Quality Reports often fail to acknowledge these facts in their analysis. Such short-term variations are important in light of reports (e.g., R.A. Michaels, 1996; 1998) that show **short-term excursions can explain some of the excess mortality and morbidity attributed to ambient particulates**.

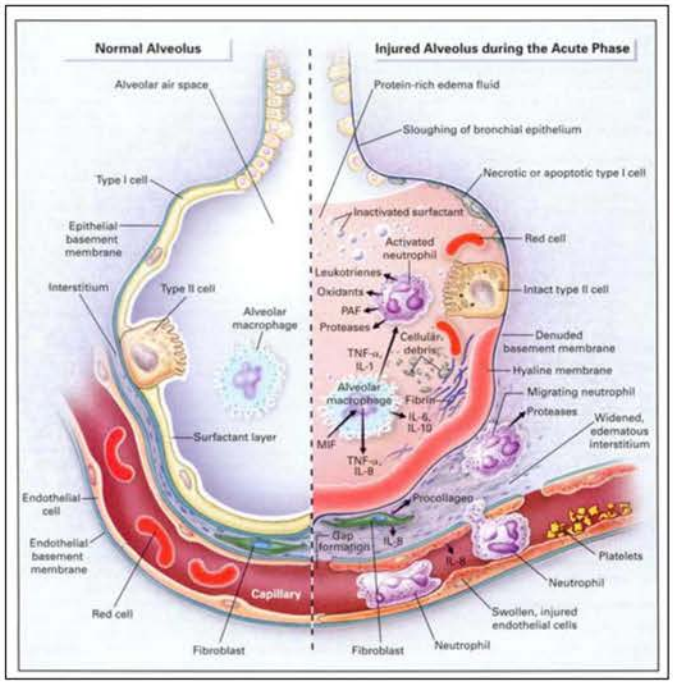
2 (j) Adverse impacts on health and well-being

Exhaust pollution including coarse, fine and ultra-fine particles, gaseous irritants (e.g., O_3 and NO_2), and PAH's either alone or in combination, are known to be associated with, for example:

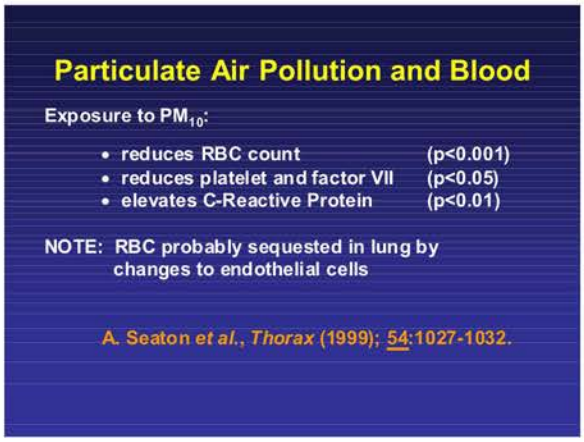
a. inflammatory lung diseases e.g., asthma, bronchitis and alveolitis
b. increased cardio-vascular disease
c. increased risk of myocardial infarction in susceptible persons
d. risk for exercise-induced heart damage
e. limited blood flow and increased blood clotting
f. increased mucous production and airway hyper-responsiveness
g. 1in 5 lung cancer *deaths* (USA) and accelerated tumour growth
h. premature death
i. symptoms of anaemia e.g., tiredness, headaches, fatigue and shortness of breath.
j. low birth weight and small head circumference of neonate.
k. intra-uterine growth retardation (for each 10 nanograms PAH's /M^3 increase)
l. certain leukaemias e.g., from exposure to benzene.
m. loss in productivity, absenteeism from work and school.
n. increased sensitivity to bacterial products in airways
o. more severe common viral asthma
p. reduced male fertility
q. significant risk of ovarian cancer from exposure to vehicle pollution
r. adverse effects on lung development from the age of 10 to 18 years

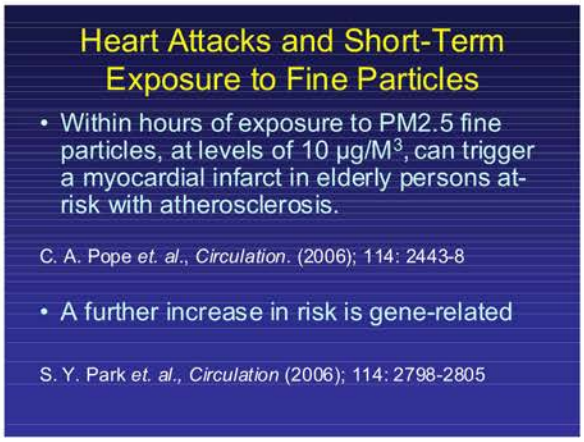


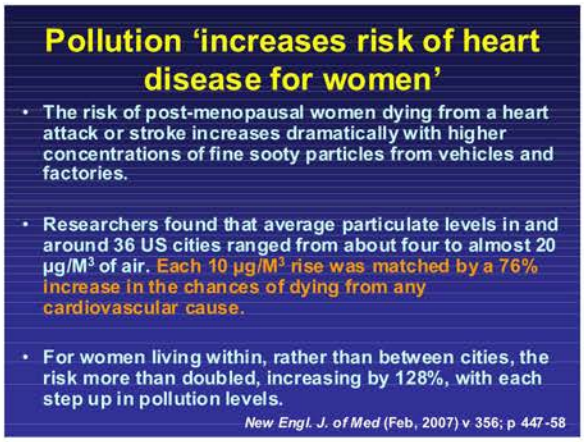
Lung and Heart Relationships in Gas Exchange

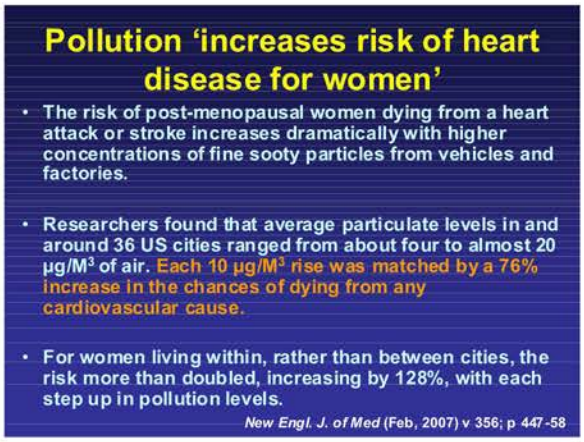


Normal Alveolus and Effect of Acute Inflammation









2 (k) Older adults are at increased risk of being hospitalized from exposure to fine-particle air pollution.

http://www.sciencedaily.com/releases/2012/04/120417221835.htm

The results showed an association between long-term exposure to fine air particles for all hospital admissions examined. For example, for every 10-µg/m^3 increase in long-term PM2.5 exposure, the researchers found a 4.22% increase in respiratory admissions, a 3.12% increase in cardiovascular disease admissions, a 3.49% increase in stroke admissions, and a 6.33% increase in diabetes admissions.

Particulate air pollution is one of the largest avoidable causes of death and illness and unlike diet and exercise, does not require behavioural change. Off-the-shelf technology can be retrofitted onto sources of pollution at modest cost, with a large health benefit. This study shows that in addition to avoiding deaths, such measures will reduce chronic disease and medical care costs.

2(l) Exposure to air pollution linked to heart disease

The largest study (published Feb., 2013) yet to investigate the links between fine air-borne particulate matter (PM) and patient survival after hospital admission for acute coronary syndrome (ACS) found death rates increased with increased exposure to PM2.5.

http://www.sciencedaily.com/releases/2013/02/130219201519.htm

The study found that for every 10µg/m^3 increase in PM2.5 there was a 20% increase in the death rate. For example, over one year of follow-up after patients had been admitted to hospital with ACS, there would be 20% more deaths among patients exposed to PM2.5 levels of 20 µg/m^3, compared to patients exposed to PM2.5 levels of 10µg/m^3.

Dr Tonne and her colleague Paul Wilkinson, professor of environmental epidemiology at the London School of Hygiene & Tropical Medicine, estimate that death rates would be reduced by 12% among ACS patients if they were exposed to naturally occurring PM2.5 rather than the higher levels to which they were actually exposed. This translates to 4,783 deaths occurring earlier than they should do, due to exposure to PM2.5 from human-made sources. The implication is that reducing levels of PM2.5 will lead to increased life-expectancy.

2 (m) Causes that put people at risk - Most diseases including cancer and heart attacks are *multi-factorial* in induction and development

2 (m)-1 NSW Cancer Council's embarrassment: That WHO in June, 2012 declared diesel fumes to be a proven Level-1 carcinogen for human beings poses an immense embarrassment to the NSW Cancer Council whose former CEO was quick to publicly criticize anyone who stated that lung cancer was caused by anything other than tobacco.
http://www.cancercouncil.com.au/lung-cancer/lung-cancer-risk-and-prevention/
Minimal and obscure mention is made by NSW Cancer Council of diesel fumes:
http://www.cancercouncil.com.au/15559/cc-publications/understanding-cancer-series/understanding-lung-cancer/understanding-lung-cancer-qa/?pp=33312
How utterly spurious and uninformed such comments are! In practical terms they ignore PM2.5 diesel fumes as a proven cause of lung cancer confirmed in e.g., a study (that excluded tobacco) in 2004 where one-fifth of lung cancer deaths was attributed to exposure to fine atmospheric PM2.5 particles derived from the exhaust pipes of motor vehicles. See links:
http://www.reuters.com/article/2011/10/28/us-air-pollution-idUSTRE79R5NM20111028

http://epw.senate.gov/107th/Levy_1.pdf

http://hydra.usc.edu/scehsc/web/Resources/Speaker%27s_Kit/AirPollutionImpacts.pdf

http://www.telegraph.co.uk/science/science-news/3302094/Pollution-is-linked-to-deaths-from-lung-cancer.html

2 (m)-2 Celebrity 'experts': Equally disturbing is when 'experts' seemingly fail to understand the importance of the *multi-factorial nature* of certain diseases such as cancer. For example, one 'expert' is reported to profess single cancer causations but excludes the documented importance of 'co-factors' such as inflammation and other factors e.g., reduced levels of the anti-cancer hormone – melatonin – in carcinogenesis/tumorigenesis. These 'co-factors' are misleadingly relegated to a category of "unproven risks" thereby obscuring the proven requirement of 'initiators' and 'promoters/co-factors' in cancer development.
http://theconversation.edu.au/unproven-cancer-risks-diverting-focus-from-real-cause-lifestyle-5629

Government departments (e.g., Energy, Health, Environment etc) appear to adopt the **same strategies** used successfully to support the use of white asbestos (chrysotile) as a safe material

(*J. Occup. Environ. Med.,* 2005; 47: 137-144). The same techniques are being used to subvert the community into thinking exposure to vehicle pollutants is without risk to health and well-being.

It can be readily inferred from the above articles that a "denial" of the hazard of an agent by its protagonists, no matter how distinguished, may not correspond with "the truth, the whole truth and nothing but the truth."

Reports and studies from these sources often show findings which seem consistent with a popular form of "denial" used by the advocates of asbestos and runs like*: "We did not find the evidence for a causal association between an agent and its alleged effects"* when the evidence is based on such factors as:

- Unsound "negative" results derived from flawed data, methodology and study-design.
- Concealment of data that effectively removes scientific rigour and renders a reviewer powerless.
- Sampling (or questionnaire) is not properly conducted in the true exposure and breathing zones.
- Subverting the thinking of people by the release of false information, rather than a disclosure of the true facts publicly.
- Deliberately avoiding definitive answers to a number of important questions by failing to establish and operate a long-term sampling strategy for determining the qualitative and quantitative measures of hazard exposure of subjects in the study.
- Keeping opinions to themselves, when confronted with the facts, allowing government or industry agents to effectively operate a policy of concealment by silence in the face of error while evidence of proven causal effects is kept confidential by agreement with management.
- Early denial is given authority when made by government or industry medical officers or by some medical consultants and others, often with 'conflicts of interest'. The significance of the hazard is down-played with a "so what?" attitude.
- Claiming to adopt "world's best practice" to imply, falsely, there are no risks to health.
- Omitting significant numbers of workers (receptors) and thereby introducing a 'negative' bias.
- Applying inappropriate standards or methods to effectively minimize the concentration of the hazardous agent in the exposure.
- By initiating an 'epidemiological survey', as a ploy, when faced with a health problem, or to simply ignore the problem. It buys time, similar to RTA's M5 East 'filtration trial.'
- Deliberately terminating studies at a stage when findings are suggestive.
- Failing to adopt Precautionary Principles to contain the toxic agent by not installing adequate environmental control technology.
- Suppressing highly critical 'audits of performance' for political expediency.

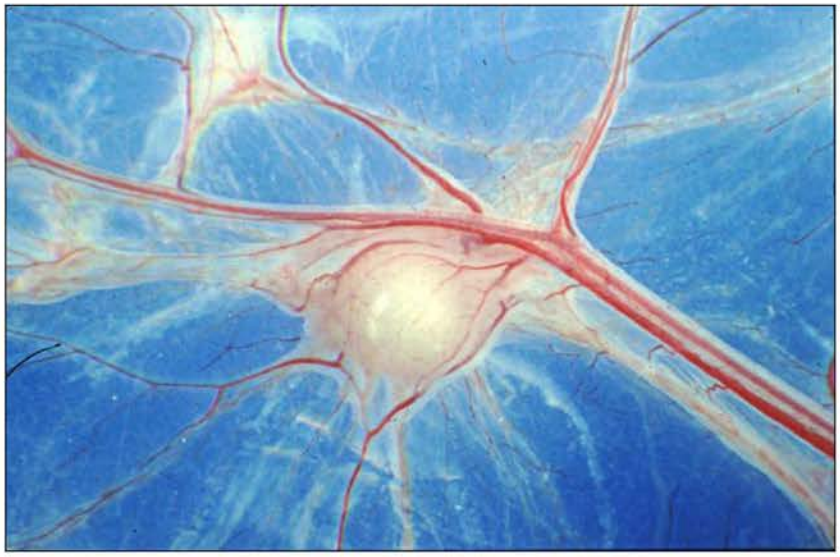
There have been too many studies world-wide which directly link vehicle emissions with mortality and morbidity for government to engage in a study where they would not be able to find the associations between vehicle emission and community health These strategies were used to hide the public health hazards of asbestos for over a century also feature in the techniques adopted by bureaucracies to perpetuate the **myth** that the exhausting of vehicle pollutants from tunnel stacks, in residential areas, poses no health risk, either short or long term, for anyone.

The significance of 'co-factors' in cancer initiation by air pollution is commented as follows:

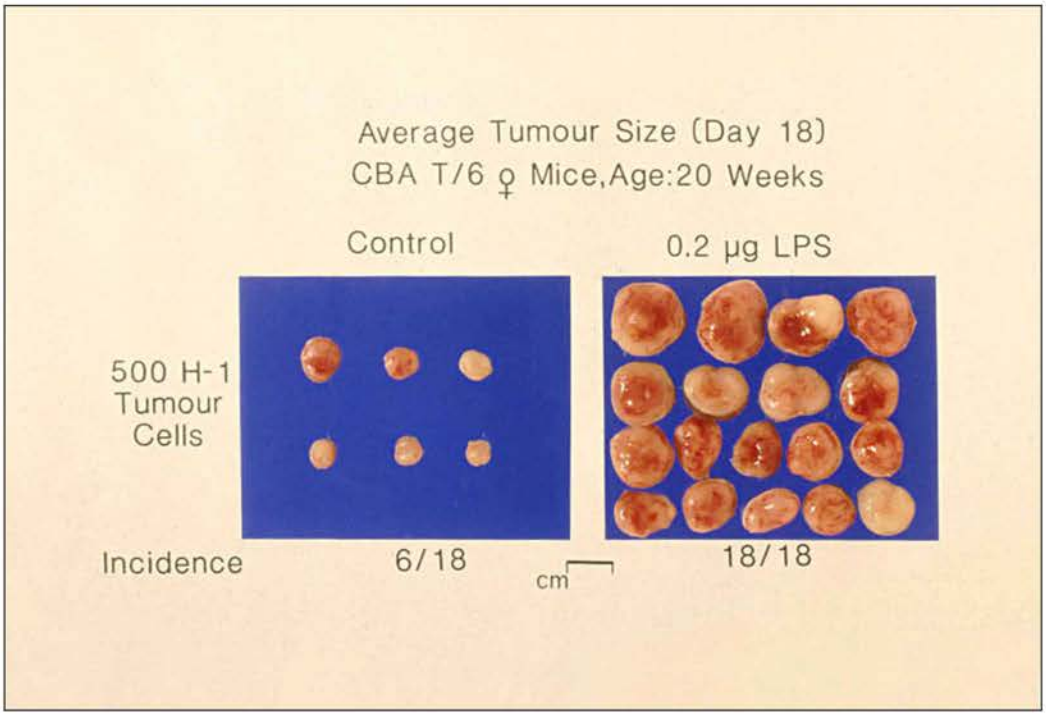
2 (n) Examples of the multi-factorial nature of cancer development.

2 (n) - 1 Inflammation: (i.e., body's response to tissue injury e.g., sunburn, infection or a wound) is a *potent accelerator* of cancer growth *initiated* by a carcinogen e.g., diesel fumes,

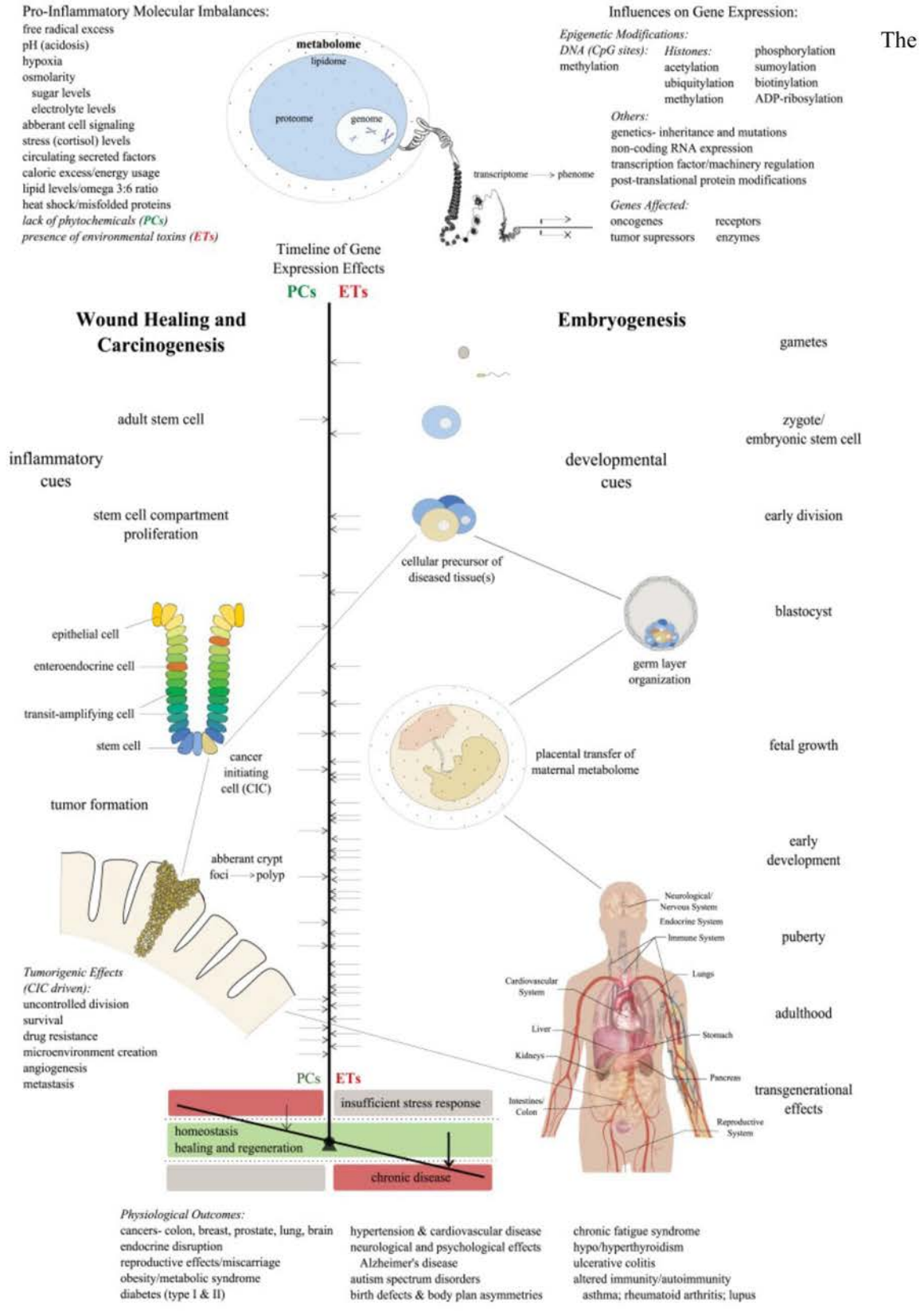
UV-radiation, asbestos or tobacco smoke. Surgery (tissue injury induced-inflammation) to remove a primary tumour is long documented to be a potent accelerator of any residual secondary tumour deposits.
http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3365481/
http://jcb.rupress.org/content/192/4/547.full



Photograph by Dr. R. Kearney of a tumour to show induction of blood vessels for continued growth. Dormancy of a tumour is not sleepiness but occurs when cell death equals cell multiplication. Inflammation accelerates tumour growth by 'switching off' cell suicide (apoptosis)



Demonstration by Dr. R. Kearney of acceleration of experimental tumour growth by inflammation induced by LPS. It would be expected diesel particles plus LPS would give greater acceleration of tumour growth.



The Dynamic epigenetic interplay of inflammation, environmental toxins, and phytochemicals theorized to lead to homeostatic imbalance and chronic disease in modernized societies; the manifestation and extent of which depends upon the hypothetical timing of critical gene expression changes in stem cells during embryogenesis, wound healing, and colon carcinogenesis (in this scenario), with other outcomes plausible**.**

http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3365481/

Terms of Reference - 3 The standards, monitoring and regulation of air quality at all levels of government

3 (a) Flaws in Monitoring of Air Pollution

Ayers *et al*., (CSIRO, 2001) confirmed that a routinely used method of continuous sampling and monitoring PM_{10} known as the Tapered Element Oscillating Microbalance (TEOM) *under-estimated PM_{10} values*, below temperatures of about 15 - 17ºC, by as much as 25%. The national automatic air quality monitoring networks employ mainly TEOM PM10 samplers, together with some TEOM PM2.5 instruments.

The TEOM instruments are commonly adopted because of their ability to provide measurement data in real time, as compared to measurements from traditional gravimetric methods, which are available only after the period required for collection and weighing. TEOM measurements, therefore, allow the provision of real time information to the public and input into research to identify sources of particulate matter. In measuring PM10 the divergence is typically of the order of 20%, but rarely exceeds 40%.

In addition, NSW air quality monitoring allegedly **does not incorporate an additional correction factor** for 'secondary particles.'

*Background levels of PM_{10} have been **underestimated by 11–40%,** dependent on meteorological and air quality conditions* (Katestone Environmental Report 25.1.2002)

Why? Because NSW **refuses to incorporate a correction factor** into its continuous measurements of particles by the TEOM method. The correction factor is needed when ambient temperatures are below 17C. This omission enables the government to report on lower levels of pollution than exists and to avoid exceedances that require filtration in the tunnel to be installed.

Ventilation Stack Limits

West Stack: conc limit - **1.6 mg/ M^3/ 30 min.**

East Stack: conc limit - **1.2 mg/ M^3/ 30 min.**

Combined Annual load limit - **14 tonnes**

Note:

- **LCC analysis established 14 tonnes will be exceeded**
- **Weight measure is not appropriate for health risk**

Noteworthy is the NSW Planning Minister's Conditions of Approval (MCoA) for the Lane Cove Tunnel:

Note that the MCoA allows 14 tonnes of PM10 each year to be discharged from the 2 stacks, but the existing monitoring stations were too far away to detect any of this PM10.



Note that the MCoA allows ***154 tonnes*** of highly toxic volatile chemicals to be discharged each year from the 2 stacks. However, the monitoring stations that existed did NOT have the instruments to detect any.

Terms of Reference – 4 Any other related matters

4 (a) 'Feelings' are treated as evidence of fact

Throughout Government/consultant Air Quality Reports there seems to be a selection only of facts and arguments that tell in their favour. Coloured words and phrases appeal to the emotions rather than to reason, and sometimes mean nothing at all. Often their language lacks clarity and precision and is **without freedom of over-statements**. Such Reports usually do **not** give the community **all the available facts** to enable them to form an **independent opinion based on cold fact, rather than coloured assertions and feelings**. Repeatedly, 'feelings' are then allowed to judge facts. Even worse is when 'feelings' are treated as evidence of fact. Then, it appears, begins the transition, by an insidious artform, from scientific stringency to political expediency.

Health bureaucrats and telecommunication 'experts' state they are *"not sure yet"* how big the problem is and *"we have not identified the extent of the problem"* or *"we have yet to understand the underlying mechanism"*. Meanwhile it is business as usual and ***willful blindness to the truth!***

4 (b) Citizen activists

In the 2009 documentary *The Idiot Cycle*, it is claimed that certain chemical manufacturers are profiting from the production of cancer-causing products and then some of the same companies are investing in profitable cancer treatments. The function of the transnational corporation is not to promote a healthy ecology, but to extract as much marketable value out of the natural world as possible, even if it means treating the environment like a septic tank.
Profit is the name of the game! The support systems of the entire ecosphere – the Earth's thin skin of fresh air, water and topsoil – are at risk. National and international regulatory mechanisms, *based on evidence*, must be put in place to ensure that basic resources such as land, water and the means for accessing fresh water do not become merely the means for profit accumulation for the wealthy. Enter the Citizen Activist!

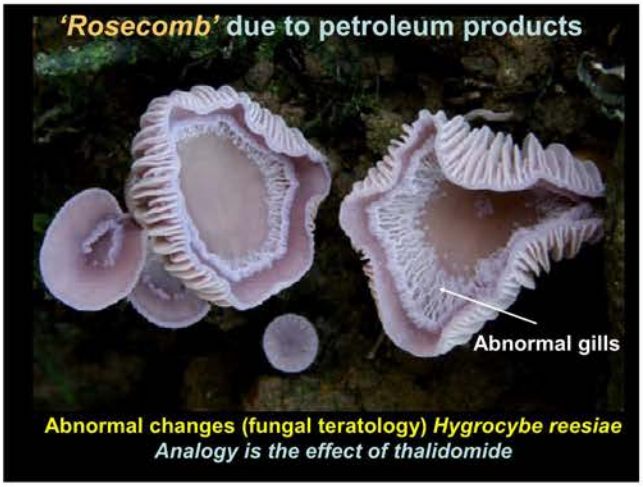
According to new information by teams of citizen scientists and experts, the Earth is now entering the sixth mass extinction event in its four-billion-year history. This die-off is the only

such event precipitated by human beings. Over 10,000 amateur scientists and professionals in the World Conservation Union have compiled data showing that currently 51 per cent of known reptiles, 52 per cent of known insects and 73 per cent of known flowering plants are in danger along with many mammals, birds and amphibians.

4 (c) Endangered fungi threatened by diesel fumes

However, plants and animal life along with amphibians are not the only species to face extinction. So too are species of fungi already listed as protected under NSW State legislation.

Mycology enthusiasts, Elma and Ray Kearney, recently brought to the attention of Lane Cove Council an alarming observation referred to as *'Rosecomb'* (abnormal gills – due to diesel toxicity) in protected *Hygrocybe reesiae* and similar malformations in other endangered fungi.



The holotype (new), mushroom *Hygrocybe reesiae*, originally found in LCBP by the Kearney's, was listed (2000) under the *NSW Threatened Species Conservation Act, 1995*. For the *first time*, abnormal changes in protected waxcaps (*Hygrocybe* fungi) in Lane Cove Bushland Park are now recorded. *'Rosecomb'* refers to the gross malformations when mushrooms are exposed to *petroleum products*. *H. reesiae* rosecomb is *not* a genetic mutation but rather genetic *instability* coupled with an *exogenous factor* e.g., diesel fumes to induce changes in *morphogenesis* of gills, late in development of the fruiting structure. The analogy is *thalidomide teratology*. Extinction may occur if threats remain, especially at 16°C and higher toxic levels. In response to these concerns, LCC has implemented a program to monitor diesel pollution in the tributary of Gore Creek that flows through LCBP. What is also relevant is that the World Health Organization declared in June, 2012 that diesel fumes are a *Level-1 human carcinogen*. Is *H. reesiae* rosecomb a wake-up call as another marker of an environmental genetic and epigenetic toxin (diesel) harmful to people?

At the time of *Rachel Carson's seminal work 'Silent Spring', published in 1962,* there was virtually no environmental movement. Her impassioned plea arose from her understanding of biological science and the fragile relationship of the ecosystem that we and all other living things rely upon.

In the words of the *'Desiderata'* (1927): *"You are a child of the universe no less than the trees and the stars; you have a right to live ..."* Collective defiance and its subsequent disruption have always been essential to the preservation of democracy and our life-support systems!

4 (d) War Against Cancer - Have We Lost Our Way? Cancers on the increase!

Despite repeated assertions by the National Cancer Institute (NCI) that America is winning the war against cancer, the incidence of cancer has escalated to epidemic proportions, striking most families. Cancer now impacts about 1.3 million Americans annually and kills 550,000; 44% of men and 39% of women develop cancer in their lifetimes. While smoking-related cancers have decreased in men, there have been **major increases in *non-smoking cancers* in adults as well as childhood cancers**. Why are we not making more progress preventing cancer?

The NSW Cancer Institute predicts approximately a doubling of new cancer cases in the next 20 years from the present 35,000 per year. Total cancer costs in NSW are estimated to be $1.627 billion for 2006. See link:
http://www.cancerinstitute.org.au/cancer_inst/publications/pdfs/abstracts/2007-11-16_cosa2007_cost-of-cancer.pdf

In 2005, R. Clapp, G. Howe, and M. Lefevre published a detailed report on the causes of cancer titled *'Environmental and Occupational Causes of Cancer; A Review of Recent Scientific Literature'*. They tell us that between 1950 and 2001 the incidence rate for all types of cancer increased 85%, using age-adjusted data, which means cancer is not increasing because people are living longer. People are getting more cancer because they are exposed to more cancer-causing agents!

Contrary to well-funded rumours, the *culprit is not just tobacco* or its numerous toxic chemical additives. Tobacco products remain the single most significant preventable cause of cancer, but ***they have not been linked to the majority of cancers*** nor to many of the cancers that have increased most rapidly in recent decades e.g., lymphomas, brain, and bone marrow cancers.

The bulk of the Clapp-Howe-Lefevre report is a cancer-by-cancer compendium of what recent human studies tell us about environmental and occupational exposures that contribute to all cancers. Many of the carcinogens are well-known: e.g., benzene, aromatic amines, petrochemicals and combustion byproducts (polycyclic aromatic hydrocarbons - PAHs), diesel exhaust, petroleum products, dioxins and outdoor air pollution.

The growing burden of cancer on children provides some of the most convincing evidence of the role of environmental and occupational exposures in causing cancers. Most children do not smoke, drink alcohol, or hold stressful jobs.

Clapp-Howe-Lefevre put it this way:
"We have learned how to save more lives, thankfully, but more children are still diagnosed with cancer every year. The incidence of cancer in all sites combined among children ages 0-19 increased by 22% from 13.8/100,000 in 1973 to 16.8 in 2000 and most of this increase occurred in the 1970s and 1980s. Epidemiologic studies have consistently linked higher risks of childhood leukaemia and childhood brain and central nervous system cancers with parental and childhood exposure to particular toxic chemicals including solvents, pesticides, petrochemicals, and certain industrial by-products (namely dioxins and PAHs)." So it is more complicated than just tobacco!

Their report makes a compelling case that numerous industrial chemicals contribute to many kinds of cancers. But where this report really sparkles is in its clear call for **prevention**.

The truth is, however, an epic struggle has been going on for 50 years between the "slash and burn" (surgery, radiotherapy and chemotherapy) camp, versus those who think the only real victory is prevention of disease. The struggle occurs across a fault line defined by money. To be blunt, there is no money in prevention. Whilst cancer treatment saves some lives, it is a booming business while cancer *primary* prevention has generally lost its way.

Apart from basic research, the cancer establishment's mindset remains fixated on 'secondary' prevention or damage control - screening, diagnosis, and chemoprevention (the use of drugs or nutrients to reduce risks from prior avoidable carcinogenic exposures) - and treatment. This is coupled with indifference to primary prevention, other than lifestyle factors - smoking, inactivity, and fatty diet. This exclusionary claim remains based on a scientifically discredited 1981 report by British epidemiologists, Sir Richard Doll and Sir Richard Peto. They **guesstimated** that lifestyle factors (e.g., smoking) are responsible for up to 90% of all cancers, with the balance arbitrarily assigned to environmental and occupational causes. The prevention-is-pointless crowd

latched onto the Doll and Peto study and spread it everywhere, contributing to numerous, preventable cancer deaths.

The USA federal NCI and the American Cancer Society (ACS) which, together are called the 'cancer establishment' adopted the Doll-Peto perspective, that cancer is a lifestyle disease - the victims themselves are responsible! The 'cancer establishment' ignored the fundamental and widely accepted Precautionary Principle and poured billions of dollars into new cancer treatments. Meanwhile, cancer incidence rates climbed relentlessly - making the cancer-treatment industry healthier and wealthier. Australia followed the ruse of the USA 'cancer establishment' and continues to refuse to shake off the stupor induced by the misleading Doll-Peto arithmetic, which pretended to prove that environment and occupational exposures are of no consequence.

Doll's fame and knighthood arose from his work in 1954 when he reported on the cancer association with e.g., smoking, exposure to asbestos and certain coal-tar chemicals. However, over subsequent decades, Doll drastically changed his views and gradually emerged as a major defender of corporate industry interests in the mistaken belief that greed helps the world go round. Doll insisted that anti-cancer campaigns should focus exclusively on scientific research, freely accessed by the pharmaceutical cartels, and not become involved in prevention research and education.

Since 1976, Sir Richard Doll's appalling track record of pro-industry bias allegedly helped to peddle their deadly wares by claiming otherwise by his subjective armchair science. Doll also allegedly accepted consulting fees from Dow Chemical Corporation, the Chemical Manufacturers Association and ICI for his work that exonerated vinyl chloride as a carcinogen - a conclusion the World Health Organisation rejected. See link: http://www.whale.to:80/v/walker_doll.html Among his numerous, outrageous scientific blunders, in 1985, Doll wrote to the judge of an Australian Royal Commission, investigating claims of veterans who had developed cancer following exposure to the herbicide Agent Orange in Vietnam, in strong support of the defense claims of its major manufacturer, Monsanto. He stated that, *"TCDD (dioxin), is at the most, only weakly and inconsistently carcinogenic in animal experiments"*. In fact, dioxin is among the most potent known tested carcinogens, apart from confirmatory epidemiological evidence. Doll's defense, resulted in denial of the veterans' claims. What is so scandalous is that Doll received a daily consultant's fee of $1,500 from Monsanto Corporation during the 1980s when he was investigating its product, Agent Orange, as a carcinogen. Separately, in 1985, the U.K. Society for the Prevention of Asbestos and Industrial Disease (SPAID) **criticized Doll for manipulating scientific information.**

The war against cancer must be fought by strategies based on primary prevention, rather than reactively on 'secondary' prevention or damage control. This war must be waged by leadership accountable to the public and not special interests. Comprehensive cancer prevention programs need to reduce exposures from all avoidable sources including cancer-causing vehicle emissions. Cancer prevention programs focused on tobacco use, diet, and other individual behaviours disregard the lessons of science - according to Clapp-Howe-Lefevre (2005) who offer some guidelines for preventive action:

1. The least toxic alternatives should always be used.
2. Partial, but reliable, evidence of harm should compel us to act on the side of caution to prevent needless sickness and death.
3. The right of people to know to what they are being exposed be protected.

While a handful of contemporary public health epidemiologists still work in this way, those linked to industry or to government bureaucracies invariably work not for the people, but to defend the profitability of corporations, and to legitimize the authority of the State with dependent patronage. Their research is constantly updating not 'what is best for the people' but what risk to the people that 'industry' can profitably get away with and how best to fund their

armchair science. Whilst some have argued that Sir Richard Doll should be remembered with fondness, respect and gratitude, there are poignant lessons for all to learn.

Prior to his death, Doll finally admitted: *"It does look as if it is the cancers that are principally caused by hormones that are not affected by smoking. Most of the other cancers throughout the body are induced by exposure to chemicals, often environmental ones."*

For decades, powerful groups of interlocking corporate interests, with the highly profitable cancer drug industry at their hub, have dominated the losing war against cancer. Research has found e.g., that up to one-fifth of lung cancer deaths are attributed to exposure to fine particles from fossil fuel combustion. See link:
http://www.newscientist.com/article/mg17323331.100-big-city-killer.html

This is unwelcome news for the campaigners against passive smoking! A cancer-research moratorium in Australia is long overdue.

In Australia, our 'regulators' need to confront the cancer-causing polluters directly. **The public should be concerned that uncertainty is too often parlayed into an excuse to do nothing until more research can be conducted.** Why the need for a 'trial' of filtration in the M5 East tunnel when it is already proven technology overseas? Government's answer to cancer is to **'blow it in the wind!'** Similarly, CSIRO conducts flawed studies of 'health benefits' of E5 and E10 fuels 'under Australian conditions' but excludes E85 as a clean alternative fuel. So, the winnable war against cancer continues to be lost! See link:
http://www.preventcancer.com/press/pdfs/Stop_Cancer_Book.pdf

4 (e) Air-Pollution Odours and Health Effects

The opening of the Lane Cove Tunnel resulted in a number of complaints from residents about air-pollution odour. The implication being that this is associated with 'groundstrike' by fumes of unfiltered tunnel pollution from the tunnel's exhaust stacks. The same experience continues to be reported in 'odour diaries' by residents affected by toxic fumes from the M5 East stack. In the past, unpleasant environmental odours have been considered warning signs or indicators of potential risks to human health but not necessarily direct triggers of health effects. The latter assumption has now changed because certain environmental malodours have now been shown to trigger health symptoms.

Overseas, community-wide exposure to toxic substances is an increasing source of large-scale civil litigation, and claims for psychological damage are commonly included. However, in such a setting, the possibility of malingering can lead to an exaggerated symptom report and invalidate data.

During the last decade, great progress has been made in understanding the smell or olfactory system and how environmental odours can influence behavioural and cognitive function. From a regulatory perspective, 'odour pollution' is most frequently handled as a nuisance abatement issue pertaining to specific sources. Nuisances can be defined on both an attitudinal and behavioural basis where the latter might include such adaptations as staying indoors and keeping windows closed. Unfortunately, with the ongoing debacle of the M5 East tunnel ventilation, NSW public health officials have great difficulty in distinguishing odour effects as 'annoyance' or a 'health effect'.

The health impact of environmental odour pollution varies with both the source and the exposed population. Whilst some environmental odours herald toxicologically important exposures, some potent odourants, such as hydrogen sulphide (rotten-egg gas), have odour thresholds several orders of magnitude lower than their thresholds for irritant (or other toxic) effects.

Notwithstanding this margin of safety, residents impacted by such emissions often report not only odour-related annoyance but also symptoms of illness.

The community is well aware that some odour chemicals may be accompanied by other chemicals that are known to be toxic. Hence the perception of odour on the part of a community member may very well signal impending danger. For certain odours, especially sulphurous gases, this can give rise to a major paradox. The same concentration of hydrogen sulphide detected from a boiled egg may elicit tasting enjoyment but the same concentration perceived to be coming from an environmental source such as a tunnel exhaust stack can elicit a complaint and the report be accompanied by nausea, headache and shortness of breath.

Heightened symptomatic responses to odours are well documented in two medical conditions – pregnancy and asthma. The majority of women report nausea and vomiting in the first trimester of pregnancy. Odours (e.g., household, food and industrial chemicals) can act as triggers of nausea and vomiting during this period. For asthma, Shim and Williams (*Amer.J Med.* 1986; vol. 80, p18-22) found that 90% of a group of 60 asthmatics surveyed reported exacerbations of asthma in relation to odour exposures, and nearly 40% had visited emergency rooms after such incidents. On repeat testing with a placebo (saline), the results of abnormal lung function in the asthmatics were not affected. Several separate studies have shown that exposure to odours by asthmatics, whose skin prick-testing confirmed a lack of immunological reaction, could provoke asthmatic attacks. Therefore, individuals with odour-triggered respiratory symptoms or 'sensory hyper reactivity' should <u>not</u> be assumed to have asthma, but rather should be considered in terms of a broader differential diagnosis.

Reports have also shown that odours can serve as a cue for an acute 'stress' state in an individual who is pre-disposed to view the odour source as posing a toxicological threat. This stress could either precipitate symptoms directly through mechanisms (e.g., nausea and headaches) of the central nervous system (CNS), or lead to heightened awareness and reporting (e.g., irritation of the respiratory-tract mucosa).

Although somewhat controversial, odours are thought to play a part in some episodes of 'mass psychogenic illness.' Such episodes typically occur among closed populations under some degree of psychosocial stress. In recent studies, physiological monitoring and functional CNS imaging have, in real time, confirmed that the CNS system reacts differently to pleasant and unpleasant odours.

There are at least three mechanisms by which ambient odours may produce health symptoms. The first mechanism is where the symptoms can be induced by odourants at levels that also cause irritation or other toxicological effects. Irritation - rather than the odour - is the cause of the health symptoms. Examples include ammonia, chlorine and formaldehyde. Sensory irritation can be induced by a single odourous chemical or by the aggregate effect of low concentrations of compounds as in exhaust-pipe emissions containing multiple volatile organic chemicals. When irritant mixtures or compounds come into contact with the upper and/or lower respiratory tract many systemic effects can occur including 1) altered respiratory rate; 2) reduced respiratory volume; 3) increased nasal secretion; 4) lacrimation (watery eyes) and tearing; 5) sneezing; and 6) increased blood pressure.

The second mechanism is where health symptoms occur when the odourant concentrations are not irritating. The way this happens is not well understood. Brain structures that are stimulated by unpleasant experiences are preferentially stimulated when smelling e.g., hydrogen sulphide. Many studies have shown that unpleasant odours can impair mood. When malodours are present as a result of M5 East stack pollution, the residents have reported symptoms of increased levels of tension, depression, anger and fatigue. Some researchers have suggested that conditioned or learned associations may play a role in perceptions and health symptoms induced by malodours.

The third mechanism is where a co-pollutant is present in the pollution mixture and is responsible for the reported health symptoms. Odours can arise from the incomplete combustion of fossil fuels. Harmful effects may arise from certain odourless gases. Nitrogen dioxide, a gas produced in the combustion of fossil fuels, is odourless but is an irritant and can trigger asthma attacks. Fine exhaust particles that carry carcinogenic chemicals can dissolve in the respiratory tract and initiate tissue injury that induces the inflammatory response. The associated acute respiratory effects can be augmented in the presence of odourous compounds.

4 (f) Alcohol as a Fuel

The increasing cost of petrol in some countries and new laws requiring alternative fuels to reduce adverse impacts on health by fossil fuels have turned attention to car and truck designers to 'flexi-fuel'. Chief among alternative fuels is alcohol and 'biodiesel'.

'Alco-cars' have been used in Brazil and with modern design improvements is seeing a resurgence of sales.

Ethanol can be made from farm products such as sugar-cane and as a fuel has many advantages.

- Alcohol fuels burn cleaner than regular gasoline and produce less carbon monoxide and other pollutants. Dr. Gary Whitten reports that E10 achieves a qualified 50% reduction in PM2.5 particle levels in test vehicles.
- Vehicle manufacturers in some countries have designed engines with such fuel flexibility that they are capable of operating on 85% ethanol and 15% petrol, 100% petrol or any combination in between. A special sensor on the fuel line senses the petrol/ethanol mixture and computation automatically adjusts for air:fuel ratio and timing.
- Flexi-fuel alco-vehicles are manufactured at present by Chrysler, Ford and Mazda for the same price as petrol vehicles.
- For standard vehicles, alcohol can be blended in relatively small concentrations (10%) with petrol.
- Experimental tests have shown that alcohol-fueled spark ignition engines can produce as much or slightly higher power than petrol.
- Local State production of alcohol from sugar and will maintain viability of the sugar-cane farming as well as support agricultural jobs.
- Production of fuels in the State provides energy self-sufficiency.
- Federal Government must consider the introduction of tax incentives for alcohol fuels.

These may include:

Exemption of tax per gasohol litre excise; cost pre-alcohol litre blender's tax credit; the cost per litre small ethanol producer's credit; the tax deduction of clean-fueled vehicles, and a tax credit for the production of unconventional fuels.

Such tax incentives, if enacted, would:

1. Encourage substitution of alternative renewable transportation fuels for petrol and diesel fuel, which would reduce petroleum consumption and importation.
2. Help support sugar-cane farmers for nearly all of Australia's ethanol production needs, and
3. Reduce adverse impacts on health as well as improve air quality.

A problem in NSW is not only the lack of commitment by the 'Energy Minister' but a total absence of enforcement of the existing legislation. This is also illustrated by the Oil Cartels FAILING to provide genuine E10 but rather under-blended E8.

Australia's capacity to produce alcohol from sugar-cane and wheat is immense.

Recently the British Heart Foundation reported that even cyclists riding to the office along busy roads in cycleways adjacent to bus lanes do themselves more harm than good by inhaling the toxic diesel fumes from buses and urged that cycleways be located away from major roads.

Costs of morbidity and mortality due to exposure to fossil fuel-combustion in Sydney alone exceed $2-3 billion annually and more people die each year from motor vehicle emissions that in road accidents.

A Case Study in Tokyo showed that by reducing particle pollution by 50% was accompanied by a health-cost benefit in one year alone of at least $A47 billion.

The Australian Medical Association, (See below) endorsed by the Australasian Lung Foundation, who reported that the following interventions would reduce the negative health impacts of fossil fuel pollution:

- introduction of mandatory biofuel blends (petrol with 10% ethanol and diesel with 20% biodiesel)
- reduction of highly toxic aromatics such as benzene in petrol
- replacement of petrol/diesel vehicles with those that use liquid petroleum gas (LPG) or compressed natural gas (CNG);
- installation of in-tunnel filters and gas-detoxification systems in vehicular tunnels in heavily populated cities.

AMA BACKS MANDATORY USE OF ETHANOL IN PETROL ON HEALTH GROUNDS

AMA President, Dr Mukesh Haikerwal, has today written to the Government's Biofuels Taskforce detailing the AMA's support for the mandatory use of ethanol in petrol in the interests of protecting and improving human health.Dr Haikerwal said the AMA wants to see the biofuels debate in Australia shift from economic issues to human health issues.
"The AMA is a strong advocate on initiatives related to environmental impacts on human health such as global warming,"Dr Haikerwal said.
"We are equally passionate about the impact of vehicle emissions on human health and we would encourage governments to pursue responsible measures to reduce emissions.
"The AMA considers the use of biofuels such as ethanol in petrol as a positive move.
"In our opinion, there is incontrovertible evidence that the addition of ethanol to petrol and biodiesel to diesel will reduce the deaths and ill-health associated with the emissions produced by burning those fuels," Dr Haikerwal said.
According to the AMA's submission to the Biofuels Taskforce, there are three components of present vehicle emissions that have been shown to damage human health: the particulates (particularly PM 2.5); the aromatic component (polycyclic aromatic hydrocarbons); and the gaseous irritants such as ozone (O3) and nitrous oxide (NO2).

The AMA supports any interventions that will reduce the above three emissions and their impacts.

The AMA believes that the following interventions would reduce the negative health impacts:

•introduction of mandatory biofuel blends (petrol with 10% ethanol and diesel with 20% biodiesel)
•reduction of highly toxic aromatics such as benzene in petrol
•replacement of petrol/diesel vehicles with those that use liquid petroleum gas (LPG) or compressed natural gas (CNG);
•installation of in-tunnel filters and gas-detoxification systems in vehicular tunnels in heavily populated cities.

27 July 2005
CONTACT: John Flannery (02) 6270 5477 / (0419) 494 761

In general, the current State and Federal Governments and their respective bureaucracies have demonstrably failed to provide good governance and to constitutionally serve the electorate with a sense of common decency, justice and a duty of care.

Clean alternatives to fossil fuels

The Federal Government should establish a clear policy and maintain its commitment in support of expansion of alternative biofuels – especially ethanol-blended petrol, biodiesel and liquefied natural gas.

Health advantages to using ethanol-blends

- Ethanol is non-toxic, water soluble and highly biodegradable.
- The American Lung Association of Metropolitan Chicago credits ethanol-blended reformulated petrol with reducing smog-forming emission in the city by 25 % since 1990.
- Ethanol reduces tailpipe carbon monoxide emissions by as much as 25 %.
- Ethanol reduces particulate emissions, especially fine particulates that pose a health threat to children, senior citizens and individuals suffering from respiratory ailments

Benefits of ethanol-blended fuels

- Many countries are adopting ethanol production to reduce harmful emissions from vehicles and enhance economic development.
- Ethanol contains 35 % oxygen. Adding oxygen to fuel results in more complete fuel combustion, reducing harmful tailpipe emissions.
- Ethanol also displaces the use of toxic petrol components such as benzene - a carcinogen known to cause leukaemia.
- Ethanol is a renewable fuel, typically produced from plant matter.
- Ethanol-blended fuels account for 12 % (and growing) of all automotive fuels sold in the United States.
- Now is the time to further promote ethanol in blended fuel with a banning of MTBE in USA.
- Ethanol-blended fuels reduced the CO_2-equivalent greenhouse gas emissions by approx. 3.6 million tons in the USA in 2001. i.e., equivalent to removing 520,000 cars from roads.
- Tripling the use of ethanol in USA would triple the greenhouse gas benefit.
- Ethanol fuels not only enhance energy security and boost rural economies, but can reduce harmful air pollution and greenhouse gas emissions.
- Biofuels can cause a renewal in agriculture and rural Australia and benefit the entire national economy.

What are the advantages to using ethanol-blends?

- Less dependence on imported crude oil
- Extends Australia's dwindling domestic supply of light crude petroleum used to produce transportation fuels.
- Expanded market opportunity for Australian farmers
- Rural economic development
- Displaces dangerous components in petrol, such as benzene
- Ethanol is made from renewable resources, whereas petroleum comes from limited fossil energy sources.
- Cleaner environment (lower carbon monoxide and smog-causing emissions)
- Cleaner burning engines
- Improved vehicle performance
- Bioethanol fuel shows better performance in reducing volatile organic chemicals (VOC), PAH, benzene and butadiene, relative to petrol.

Assistance needed

- Assistance is needed in the general development of the biofuel industry. This includes new storages, crushers, refineries and associated infrastructure.
- Need to legislate (and enforce) fuel standards to include renewable biofuels such as biodiesel and ethanol-blended petrol.
- Address the escalating costs of growing canola crops because of enormous amounts of inputs, disease levels and diminished yields giving unprofitable returns.
- There is an urgent need to increase farmer confidence for canola and sugar cane.

- Long term excise relief (or domestic producers credit) is required to engender confidence that lenders will have debts/loans re-paid.
- Capital subsidy be provided for enhanced ethanol production to attract investment capital from prospective owners.

Our nation's dependence on diesel must be reassessed in light of growing scientific evidence that diesel exhaust poses a major health hazard, particularly to children and the elderly. Diesel emissions are comprised of a witch's brew of potent carcinogens, reproductive toxicants, irritants, and other hazardous chemicals. This complex mixture of fine particles and toxic chemicals is linked to cancer, asthma and other respiratory exacerbations, and premature death. Fortunately, alternatives such as electric, natural gas, ethanol and biodiesel and other less polluting fuels are technologically feasible and, in some cases, economically advantageous. The move away from diesel to clean alternatives will take a concerted effort by public and private operators and continued pressure from the people most affected by the health impacts of diesel exhaust.

The following is strongly recommended as an antidote to our nation's dependence on diesel:

- Federal and State governments must end their "hands off" diesel policy immediately and act quickly to set new stringent standards for heavy duty trucks, buses, trains, marine vessels, construction and agricultural equipment and other diesel vehicles and equipment to expedite the transition toward cleaner alternative fuel vehicles;

- Legislative and municipal bodies should provide financial incentives to operators of diesel vehicles and equipment to encourage them to purchase new alternative fuel vehicles or to retrofit their existing diesel vehicles;

- Public transit agencies and governmental entities should lead the way toward clean fuel vehicles by committing to purchase only alternative fuel buses and other vehicles for their fleets; and

- Private fleet operators should take a major step to protect their workers and local communities by immediately beginning to purchase alternative fuel heavy duty trucks, buses and equipment as part of their fleet.

HIGHLIGHTS

http://ntp-server.niehs.nih.gov/files/DieselExhaust.pdf

- Diesel exhaust is a mixture containing over 450 different components, including vapours and fine particles coated with organic substances. Over 40 chemicals in diesel exhaust are considered toxic air contaminants overseas. Australia does not list diesel as an air toxic. Exposure to this mixture may result in cancer, respiratory effects, and other health problems.

- California's Scientific Review Panel has unanimously endorsed the official listing of diesel exhaust as a toxic air contaminant, due to its cancer and non-cancer health effects. Australia has not!

- Diesel exhaust has been listed as a known carcinogen under California's Safe Drinking Water and Toxic Enforcement Act (Prop. 65) since 1990. Australia has not! Many components of diesel exhaust, such as benzene, arsenic, dioxins, and formaldehyde, are also known carcinogens. Other components, such as toluene and dioxins, are known reproductive toxicants.

- For the same load and engine conditions, diesel engines exhaust 100 times more sooty particles than petrol engines. As a result, diesel engines account for an estimated 26

- percent of the total hazardous particulate pollution (PM10) from fuel combustion sources in our air, and 66 percent of the particulate pollution from on-road sources.

- Diesel engines also produce nearly 20 percent of the total nitrogen oxides (NOx) in outdoor air and 26 percent of the total NOx from on-road sources. Nitrogen oxides are a major contributor to ozone production and smog.

- The health risk from diesel exposure is greater for children, the elderly, people who have respiratory problems or who smoke, people who regularly strenuously exercise in diesel-polluted areas, and people who work or live near diesel exhaust sources.

- According to an expert estimate, lifetime exposure to diesel exhaust at the outdoor average concentration (2.2 micrograms per cubic meter ($\mu g/m^3$) may result in about one in every 2,000 people developing cancer due to this exposure. This estimate increases to as many as one in every 1,200 at levels found in the South Coast Air Basin in Southern California (3.6 $\mu g/m^3$), and to even higher risks for those living near freeways or in highly polluted urban communities.

- Dozens of studies link airborne fine particle concentrations to increased hospital admissions for respiratory diseases, chronic obstructive lung disease, pneumonia, heart disease and death. Recent evidence indicates that diesel exhaust exposure may contribute to asthma.

- About 127 million Americans -- half of the nation's population -- live in regions with air quality that does not meet federal standards for certain air pollutants. More than 60 percent of preadolescent children, including children with asthma, live in "nonattainment" areas. In the United States, there are an estimated 10.3 million people living with asthma.

- In California, there are six million children under the age of fourteen, 90 percent of whom live in areas that fail to meet state and federal air quality standards. According to the American Lung Association, there are over a half million children with asthma in California.

- Asthma is on the rise. In the United States, age-specific death rates from the disease increased 118 percent between 1980 and 1993. African-American and Latino children have a higher risk of asthma than white children. Moreover, African-American children are four times more likely to die from asthma compared to Caucasian children.

- Cleaner alternatives to diesel engines are readily available. Alternatives include electric, liquefied natural gas (LNG) or compressed natural gas (CNG) buses and trucks. For cars, ethanol, CNG and LPG.

- Although initial purchase prices may be higher for alternative fuel buses and trucks, federal, state, and local funds are available to offset these higher costs. These funds are specifically earmarked for clean technologies and would not otherwise be available for these purchases.

- For transit authorities, use of alternative fuel buses can generate operational cost savings. Sacramento RTD's CNG bus fleet is currently demonstrating cost savings of 20-40% per mile when compared to diesel counterparts. Over its lifetime, a CNG bus will save

- 190,000 gallons of diesel fuel compared to a new diesel bus, decreasing our dependency on petroleum.

- Diesel buses and trucks are important contributors to smog (ground-level ozone) and fine toxic soot, two pollutants that have recently come under increased scrutiny because of their important public health impacts. Purchasing alternative fuel vehicles will reduce smog and fine soot emissions considerably. For example, operating a natural gas bus instead of a new diesel bus is equivalent to eliminating the smog and soot from 17-55 passenger cars.

Submission from:	Submission to:
Name: JOSEPHINE NADLOW - EVANS	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature: [signature]	Attn: Director – Transport Assessments
*Please **include** my personal information when publishing this submission to your website* ***Declaration** : I **HAVE NOT** made any reportable political donations in the last 2 years.*	Application Number: SSI 7485 Application
Address: 169 LYONS RD. DRUMMOYNE	Application Name: WestConnex M4-M5 Link
Suburb: ..... Postcode: 2047	

I submit my objection to the WestConnex M4-M5 Link as contained in the EIS application # SSI 7485, for the following reasons, **and ask that the Minister reject the application and require preparation of a genuine, not indicative, EIS**

◊ *The EIS acknowledges that visual impacts will occur during construction. However it does not propose to address these negative impacts in the design of the project. This is unacceptable and the EIS needs to propose walls,, plant and perimeter treatments and other measures at appropriate locations to lessen the impact on visual amenity. (Executive Summary xviii)*

◊ *The Rozelle and Iron Cove interchanges are not to meet the project objective of linking M4 East and New M5 (Part 3.3 of EIS) and should not be included in the Project. Existing motorways (Cross City Tunnel and Eastern Distributor) would provide suitable road capacity to avoid the city centre.*

◊ *It all very difficult for the community to access hard copies of the EIS outside normal working and business hours. The Newtown Library only has one copy of the EIS, and has extremely limited opening hours. This restricted access does NOT constitute open and fair community engagement.*

◊ *The EIS states that an alternative truck movement is proposed which involves use of the City West Link and no need for spoil trucks to access Darley Road. This proposal is supported, subject to further information about potential impacts being provided. The EIS should not be approved on its current basis which provides for 170 heavy and light vehicles accessing Darley Road on a daily basis. This will create unacceptable safety issues and noise impacts for adjacent homes while also compromising pedestrian and bicycle access to the light rail and bay run. It will also lead to truck chaos on this critical arterial road providing access to and across the City west Link. The current proposal which provides for truck movements solely on Darley Road should not be approved and approval should only be given to the alternative proposal. I repeat however my objection to the selection of this site altogether, but propose the least worst impact should be chosen if this site is to be used.*

◊ *The assessment and solution to potentially serious problems described in the EIS at 12-57 (where mainline tunnels alignment crosses key Sydney Water utility services that service Sydney's eastern and southern suburbs) is "based on assumptions about the strength and stiffness of the water tunnels given that limited information about the design and condition of these assets was available. Detailed surveys should be undertaken to verify the levels and condition of these Sydney Water assets. A detailed assessment would be carried out in consultation with Sydney Water to demonstrate that construction of the M4-M5 Link tunnels would have negligible adverse settlement or vibration impacts on these tunnels. A settlement monitoring program would also be implemented during construction to validate or reassess the predictions should it be required." The community can have no confidence in the EIS proposals that are incomplete and possibly negligent. The EIS proposals and application should not be approved till these issues are definitively resolved and publicly published.*

From: [redacted]
Sent: Mon, 16 Oct 2017 09:16:11 +0000
To: [redacted]
Subject: FW: Submission Details for Mark Wallis (object)

From: system@accelo.comOn Behalf OfMark Wallis
Sent: Monday, 16 October 2017 8:16:02 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Mark Wallis (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Mark Wallis

Address:

Rozelle, NSW
2039

Content:
I object to the proposed stage 3 Westconnex. I actually object to the whole of Westconnex but my objections to stage 3 are more locally concerned.
In particular I object to the use of unfiltered vents for the tunnel for the Rozelle bypass from Iron cove bridge to the railway goods yards. I am concerned about the air polkution from the particulate matter especially the now proven carcinogenic diesel particulate. I also object to the height of the proposed vent building. From the photo montage it looks like a definite blot on the landscape. There must be a better way of extracting and distributing these pollutants than just pumping them into the surrounding residential suburbs.
My next objection is that the extension of the m4 to city west link and the Rozelle interchange is going to just dump more traffic onto Anzac bridge which is already at maximum capacity during peak hour. This will not improve the speed of traffic movements. It just moves the choke points. This is a wasteful shortsighted project with typical RMS 20 th century vision. The advent of both electric and self driving cars in the very near future will drastically reduce the need for single car ownership by a huge number of Sydney residents. This will of itself reduce the traffic movements rendering the current proposed expenditure of $16 billion to be completely wasted. This amount of money would be much better being spent on better public transport links rather than lining the pockets of private road tolling companies.

Submission: Online Submission from Mark Wallis (object)
https://majorprojects.accelo.com/?action=view_activity&id=228293

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent: Mon, 16 Oct 2017 09:17:47 +0000
To: [redacted]
Subject: FW: Submission Details for Jayson Schoonens (object)

From: system@accelo.comOn Behalf OfJayson Schoonens
Sent: Monday, 16 October 2017 8:17:02 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Jayson Schoonens (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Jayson Schoonens
[redacted]

Address:
[redacted]

Rozelle, NSW
2039

Content:
Dear Sir / Madam,
I understand that the WestConnex M4-M5 Link willing be proceeding and the benefits the infrastructure will have on the broader State of NSW. However, given the location of my family's home and our travel requirements it will be of no benefit to my family or many other residents in Rozelle and the Inner West. Given this infrastructure is being forced upon local residents for the benefit of others, it would only seem appropriate that the State seek to reduce its impact on local families. Given my family lives in Rozelle and my children will in future years be attending Rozelle Primary School, I ask that the ventilation stacks be fitted filtration systems. Such systems exist and are surely worth the investment to protect the health of my family and other local residents.
Kind regards
Jayson Schoonens

[redacted]
Submission: Online Submission from Jayson Schoonens (object)
https://majorprojects.accelo.com/?action=view_activity&id=228295

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent: Mon, 16 Oct 2017 09:30:13 +0000
To: [redacted]
Subject: FW: Submission Details for Amy Gregg (object)

From: system@accelo.comOn Behalf OfAmy Gregg
Sent: Monday, 16 October 2017 8:30:03 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Amy Gregg (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Amy Gregg
[redacted]

Address:
[redacted]

Lilyfield, NSW
2040

Content:
I object to the application on a number of levels because of the impacts resulting from both the construction and operation of the tunnels.
Construction:
- I live on Catherine St, adjacent to the City West Link and the level of construction traffic travelling to and from the Rozelle construction site is unacceptable and will result in significant noise impacts to my house.
- 1,034 HGV trips every day passing near my house 24 hours a day, every day of the week is completely unacceptable. This will result in intolerable noise, particularly on weekends and overnight when the existing vehicular noise is relatively low. This is in addition to the 350 daily light vehicle trips to the construction site as well!
- In addition to the noise, these vehicles will result in increased traffic congestion and air pollution.
- I have a young family and use a local childcare center who will also experience the noise and air quality impacts.
Operation:
- I object to the level of traffic the Rozelle interchange will filter to and from the Anzac Bridge and the Iron Cove Bridge. It can be seen from Table 8-20 in the EIS that a number of local intersections are already operating at a LOS F, which is completely unacceptable. Therefore how can this local network accommodate the additional traffic?? From personal experience, I know that traffic on the Anzac Bridge in the AM and PM peak hours can be at a standstill and traffic over the Iron Cove Bridge is also completely congested as it is an existing bottleneck with insufficient lanes.
- I also object to the impact on air quality to the local area resulting from the ventilation stack proposed at Rozelle as I have a young family who will be impacted by the levels of emissions

The entire project is not a long term solution to Sydney's traffic problems - building more roads will attract more cars (Transport Planning 101) Money needs to be spent on more and improved public and active transport solutions. It is disappointing that the government continues to build more roads.

[redacted]
Submission: Online Submission from Amy Gregg (object)
https://majorprojects.accelo.com/?action=view_activity&id=228305

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent:
To:
Subject: FW: Submission Details

From: system@accelo.comOn Behalf Of[redacted]
Sent: Monday, 16 October 2017 8:29:02 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Name: [redacted]
Email:

Address:
[redacted]

[redacted]

Content:
One of the objectives of the M4-M5 is to facilitate the Western Harbour Tunnel and Beaches Link - which supposedly are still being planned, are subject to a reference design and government funding and planning approval.

The M4-M5 Link will overload the Anzac Bridge with traffic - and that will then make the Western Harbour Tunnel `necessary' - the EIS even identifies the Western Harbour Tunnel as mitigation for the impacts of the M4-M5 Link. This is ridiculous and exposes the fallacy of constructing motorways to 'solve' congestion.

The M4-M5 Link planning approval will include the connections for the Western Harbour Tunnel - this is a government investment in the Western Harbour Tunnel even though we are told no decisions have been made.

The M4-M5 Link - like other sections of WestConnex - will induce additional traffic on to the road network - just building up congestion and the need for more roads across Sydney.

Tolls on WestConnex will almost certainly be rising faster than wages - making these toll roads ever more unaffordable and pushing more traffic on to local surface roads. As taxpayers we will be supporting these motorways into the future.

The M4-M5 Link will concentrate pollutants from exhaust and roads including particulate matter which will then be vented out through stacks. These are carcinogenic pollutants will impact wide areas of Sydney with the particularly damaging finer particulates spreading out across the metropolitan area. The Government should be delivering projects which IMPROVE air quality for everyone in Sydney.

IP Address: [redacted]
Submission: Online Submission from [redacted] (object)
https://majorprojects.accelo.com/?action=view_activity&id=228301

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent:
To:
Subject: FW: Submission Details

From: system@accelo.comOn Behalf Of [redacted]
Sent: Monday, 16 October 2017 8:29:05 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Name: [redacted]
Email:

Address:
[redacted]

[redacted]

Content:
I am opposed to the current M4 M5 link at this stage due to the context that the government has treated the Sydney public with current Westconnex plans and works. Westconnex has so far been shrouded in a great deal of secrecy,particularly as it was started without a business case and very little public consultation.Its first reason for being built was to connect the Western Suburbs of Sydney to the Mascot Airport, this was despite the fact that a western Sydney Airport construction was imminent and would therefore negate any reason for Western Sydney to require a dedicated motorway to get to the Airport. This initial reason for Westconnex has been not been mentioned ever since the new airport was announced. It was also always difficult to pinpoint where the actual Westconnex roads were going and even when some plans were provided they did not all match the reality of where the Westconnex roads actually came out of the ground. Being a Toll road, it has sentenced the Sydney community to decades of relentless toll rises that do not match inflation and are based on maximizes profits and not simply providing a service road for the general public nor a road that assists businesses to grow if they have to pay exorbitant tolls costs.So much can be done to improve traffic light coordination and response to traffic flow changes, improving traffic flow with simple changes (e.g. why are there still bustops in the inner west only 100metres apart, resulting in buses stopping too frequently, slowing their efficiency, increasing fuel use and costs and hence constantly stopping general traffic.The first audit announced of Westconnex so far should be completed before any further links are commenced, in order to determine efficiency of public money use and see if the benefits are coming to fruition, It obviously would determine whether the workis on budget before NSW is sunk into long term debt for the Westconnex system. Thank you,

IP Address: [redacted]
Submission: Online Submission from [redacted] (object)
https://majorprojects.accelo.com/?action=view_activity&id=228303

Submission for Job: #7485 WestConnex M4-M5 Link

https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent:
To:
Subject: FW: Submission Details

From: system@accelo.comOn Behalf Of[redacted]
Sent: Monday, 16 October 2017 8:53:04 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Name: [redacted]
Organisation: 1995 (2037)
Email: [redacted]

Address:
[redacted]

[redacted]

Content:
Hello,

I am a 22 year old making my life in Sydney and would like to register my opposition to Westconnex during this EIS stage. There are significant environmental impacts that will arise from westconnex - any project bring more vehicles into an already congested city centre can result in increased air pollution. Sydney Park is a really important recreational space in an increasingly dense built up area. I do not want motorway to take away this valuable open space or natural habitat. I do not want children at schools to be anywhere near smoke stacks. There is absolutely NO sense in increasing the amount of vehicles heading into our naturally constrained CBD. No other global cities around the world are building highways into the centre!! Use the money to upgrade public transport infrastructure. The local neighbourhoods of the Inner West will be decimated by the projected increase in vehicles. Please please consider an alternative and have a thought to our future in Sydney.

IP Address: [redacted]
Submission: Online Submission from [redacted] of 1995 (object)
https://majorprojects.accelo.com/?action=view_activity&id=228307

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent:
To:
Subject: FW: Submission Details

From: system@accelo.comOn Behalf Of[redacted]
Sent: Monday, 16 October 2017 8:57:04 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Name: [redacted]
Email:

Address:
[redacted]

[redacted]

Content:
I object to the EIS and specifically to the option B, which will see a construction and tunnel dive site 200m from my children's school. I am extremely concerned about the health impact this will have on mine, and the other children attending Haberfield Public School. It appears the government is willing to sacrifice the health of a few (600+ students plus teachers and staff) for the economic benefit of the many. That's if you believe that the proposal will actually deliver an economic benefit. The scale of this spending is so huge, why not spend a little more to filter the stack. Also, why even consider Option B, when there are already the facilities and infrastrucutre in place at the site of option A. Option B may be more efficient for the tunnelling, however the health and safety risk she to the children 200m away from option B are huge. I cannot fathom why this is even being considered. The dust, the noise, the traffic dangers and congestion with hundreds of trucks hauling spoil day and night, all pose an unacceptable risk. I feel like I am being forced to chose between my children's health and their education. We live out of the area, and chose Haberfield Public specifically for its unique specialised programs designed for children with special needs such as mine. Now I am seriously considering moving them out, to our locals school just to get away from westconnex construction. I have put up with the several construction sites already within the couple of blocks from the school, but I just don think I could look past a tunnelling site on the corner of our block. I could not forgive myself if the demolition of the old car yard unleashed poisons so close to my children, the dust from tunnelling, the constant noise, the unfiltered emissions , if they caused some permanent health issue or death. How could I live wiht that? I feel we have no control, no voice, no one cares what is happening in haberfield. The best economic outcome is being favoured over the health and safety of children and the community. If I told goes ahead, our school needs insulation against the noise, air conditioning, indoor playground areas for the days when it's too windy or unsafe to play outside. We need a drop off area away from bland street traffic, a pedestrian crossing manned by SMC staff because RMS won't provide one. We need to be assured of real time monitoring of air quality and the mechanisms to be notified and cease operation if the reading reach unacceptable levels, to ensure the kids are protected at the time, not becoming aware of it days later when the exposure has happened. Option B would be a disaster for our school, and will cause so much psychological stress to parents, children and staff. Don't

underestimate the psychological effect of the visual impact of seeing construction and destruction surrounding our school on all sides. Please spare Haberfield any further destruction, we have taken our fair share already

IP Address: [redacted]
Submission: Online Submission from [redacted] (object)
https://majorprojects.accelo.com/?action=view_activity&id=228311

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent: Mon, 16 Oct 2017 10:02:28 +0000
To: [redacted]
Subject: FW: Submission Details for Ellen Shannon (object)

From: system@accelo.comOn Behalf OfEllen Shannon
Sent: Monday, 16 October 2017 9:00:04 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Ellen Shannon (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Ellen Shannon
[redacted]

Address:
[redacted]

Leichhardt, NSW
2040

Content:
if you provide space for cars people will drive. Demand will increase and people will start to complain again. There is so much research on this issue so it doesn't make sense why it is ignored.

How about better public transport ?

[redacted]
Submission: Online Submission from Ellen Shannon (object)
https://majorprojects.accelo.com/?action=view_activity&id=228313

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent: Mon, 16 Oct 2017 10:22:22 +0000
To: [redacted]
Subject: FW: Submission Details for Tim Giles (object)
Attachments: 228315_WCsubmissionTG_16Oct17_2017Oct16_2102.pdf

From: system@accelo.comOn Behalf OfTim Giles
Sent: Monday, 16 October 2017 9:03:20 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Tim Giles (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Tim Giles
[redacted]

Address:
[redacted]

Drummoyne, NSW
2047

Content:
See attachment.

[redacted]
Submission: Online Submission from Tim Giles (object)
https://majorprojects.accelo.com/?action=view_activity&id=228315

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

Submission on Active Transport

For WestConnex M4-M5 Link (EIS Phase)

Tim Giles 14/10/17

Recommendation 1

Include Active Transport outcomes within the project scope

Include Active Transport outcomes within the project scope

One of the eight key objectives of the Westconnex M4-5 link is to:

"Facilitate opportunities for future urban renewal in precincts adjoining the project, including The Bays Precinct (in accordance with *The Bays Precinct Transformation Plan*), along Parramatta Road east of Haberfield (in accordance with *the Parramatta Road Corridor Urban Transformation Strategy),* and along Victoria Road between Iron Cove Bridge and City West Link, by reducing surface road traffic on Victoria Road, creating opportunities for improved connectivity, potential active transport links and public transport improvements and improved urban design outcomes and local amenity" (reference: EIS page 3-2)

So, one of the key outcomes of WestConnex is to improve active transport. However, this project can not fob off this outcome "to others", "potentially" "in the future". WestConnex needs to take responsibility for delivering these outcomes **as part of the project**.

This means either directly delivering, or providing the resources and funding, to construct the identified active transport projects. For example, constructing the following projects as part of WestConnex, would save cost as well as deliver the outcomes much sooner (from EIS Table 7.1):

Connecting the CSELR Rozelle Maintenance Depot to Charles Street and Canal Road linking onto the Bay Run
Connecting Parramatta Road to The Crescent
Connecting the intersection of Robert Street up and over Victoria Road to the intersection of Springside Street

- The health benefits of Active Transport are well documented
- Constructing paths at the same time as constructing WestConnex reduces overall cost
- Providing quality and safe cycleways reduces demand for car journeys and public transport

Recommendation 2

Build all shared paths and cycleways
to full AustRoad standards

Build all shared paths and cycleways to full AustRoad standards

Victoria Rd is a major cycle route to the city, yet the current shared path alongside it has many drawbacks. The path is a good example of "white paint" infrastructure (a name given to a shared path that has been created solely by the addition of white paint to an existing footpath). The result is a poor quality and dangerous piece of infrastructure, thus causing many cyclists to use the bus lane instead, or to not cycle at all.

All cycle and shared paths need to be constructed to meet AustRoad standards. (Guide to Road Design Part 6A: Paths for Walking and Cycling - 2017 Edition https://www.onlinepublications.austroads.com.au/items/AGRD06A-17).

Some examples of poor path design and implementation are shown on the following pages. All photos were taken in October 2017 along Victoria Rd / Anzac Bridge.

In line with Recommendation 1, these existing problems should be resolved by the WestConnex project. In any case, no new examples of poor design should be introduced. Design to AustRoad standards must be a requirement given to WestConnex tenderers.

Car drivers would never settle for poles placed in the middle of their lane – why do should cyclists and pedestrians have to?



Pole is located in dead centre of the lane



These two poles cause a swerve towards traffic on off-camber slope. Raised pit lid to also be negotiated.



Insufficient space for bicycle handlebars to safely pass between poles



Another sign placed after the shared path was created, showing entrenched disregard for path users. The reflective tape is a poor risk mitigation technique. Placing the poles at the extremes of the path would have cost nothing extra.



Traffic light control equipment located in the middle of the path

Path Encroachment

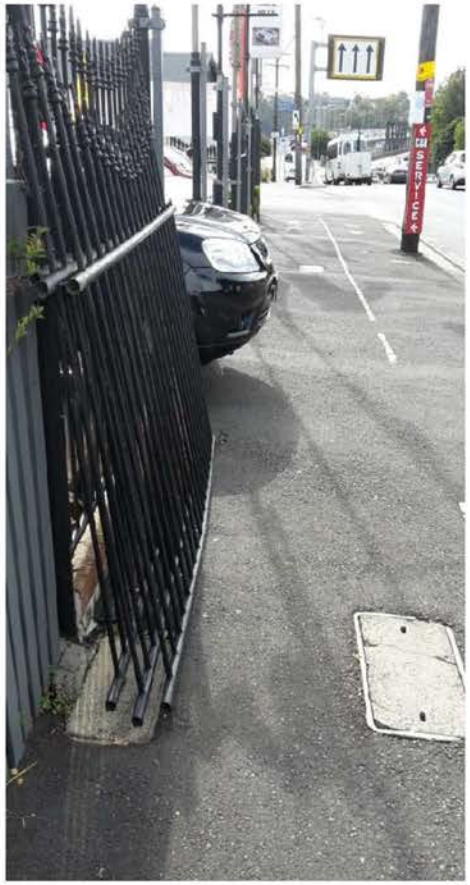


Trade vehicle blocking shared path

Pinch point has been created behind bus stop



Path Encroachment



A car sales business using the path to store cars and fencing.



Pinch point has been created between bus stop and poles

Other regular path encroachments include delivery trucks, advertising sign boards and garbage bins

Litter



At least the bottle isn't broken (yet)...



...but this bottle has been



This leaf litter has built up along the Anzac bridge approach. The fine matter is slippery, and blocks drainage when it rains, resulting in flooding. Sweeping is not regular enough.

Poor road interaction



To cross this road, you must look for turning traffic in both directions, as well as avoid the pole. If you tried to pass the pole on the left, you'd have an unexpected hop down the kerb as well, as there is no ramp.

Poor path surface



These smooth metal plates are slippery when wet. They slope downwards and are placed in the braking zone at a road intersection. In addition, the concrete surrounding the second pit has collapsed.

Temporary trench infill that was never permanently restored, leaving a rough surface.



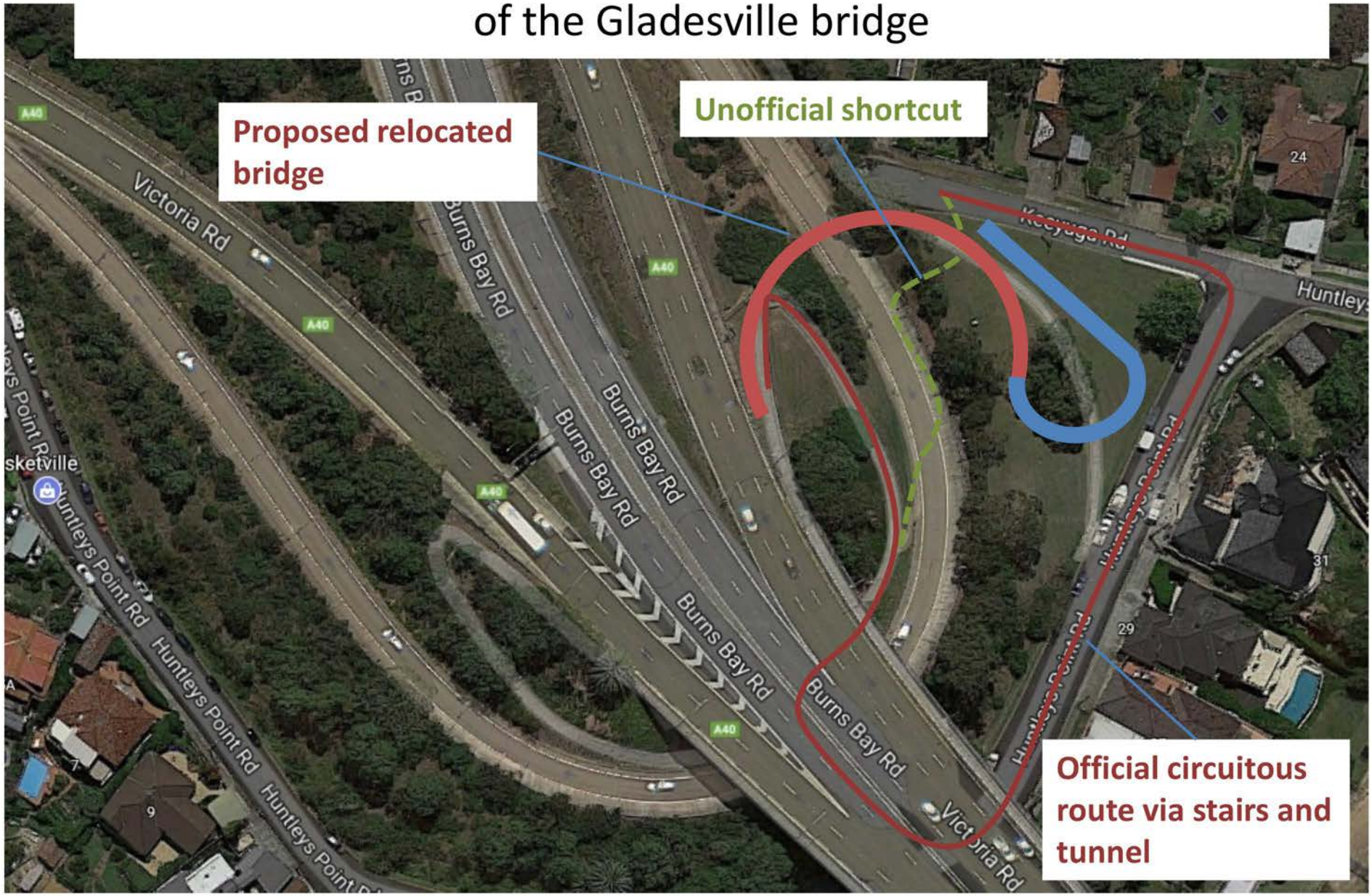
Recommendation 3

Relocate curved pedestrian bridge to Gladesville

Location of current curved bridge over Anzac bridge approach.
Westconnex propose to remove it as part of the works.



Recommendation: relocate the bridge to the northern approach of the Gladesville bridge



The current bridge site

• The pedestrian/cycle bridge over the Anzac bridge western approach is slated for demolition (EIS 5.6.6)

• The existing curved bridged is perhaps a decade old and well within lifespan

• Reusing the bridge would be much better than dumping it

• The bridge appears to be made of steel which can be easily unbolted and reassembled

The new site

• The Gladesville Bridge provides the only Parramatta River crossing between Rhodes and the CBD. It is a popular cycling route, from both the Gladesville and Lane Cove directions, across to Drummoyne.

• The official northern approach to the Gladesville Bridge currently involves a circuitous route including a tunnel and stairs

• An informal cyclist rat run across the slip road has developed, it is not particularly safe.

• The curved bridge pieces can be transported the few kilometres north on Victoria Rd using trucks and reassembled.

Note that removal of the curved bridge from it's current location should only occur after the new alternate route has opened underneath Victoria Rd.

Recommendation 4

Add additional lane to Anzac bridge

• WestConnex aims to “support and facilitate Sydney’s Bus Future: Simpler, faster, better bus services (Transport for NSW 2013a). It complements the Transport Master Plan by planning improvements to Sydney’s bus network. Sydney’s Bus Future states that investment in the bus network would occur in parallel with WestConnex” (Reference: EIS p3-5)
• Car traffic over Anzac bridge is forecast to rise with the opening of WestConnex
• Bus services will therefore be delayed in peak hour traffic (EIS p 3-19)
• By removing the shared path over the Anzac bridge, an additional traffic lane can be created. The additional lane would be designated as an east bound bus lane.
• The bridge main deck is wide enough to accommodate an extra lane. Some widening of the eastern bridge approach would be required in order to extend the bus lane through to it’s current start near Harris St.
• Pedestrians and cyclists would instead use a new shared path on the old Glebe Island swing bridge, currently disused.

Other items:

Recommendation 5: Figure 5-53: Ensure no net loss of parking spaces, as King George park is heavily used (particularly on weekends) for children's sport. Ensure parking not impacted during construction either.

Recommendation 6: Figure 5-45: Ensure that the design of the Pedestrian and cycle bridge between the Rozelle Rail Yards and Railway Parade does not have a hairpin turn (as the diagram seems to indicate). This would be difficult to navigate on a bicycle.

Recommendation 7: Figure 5-42 does not show a continuous shared path across Toelle and Callan Sts. Please ensure detailed design has appropriate crossings.

From: [redacted]
Sent: Mon, 16 Oct 2017 10:38:51 +0000
To: [redacted]
Subject: FW: Submission Details for Glen Jones (object)

From: system@accelo.comOn Behalf OfGlen Jones
Sent: Monday, 16 October 2017 9:37:03 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Glen Jones (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Glen Jones
[redacted]

Address:
[redacted]

Haberfield, NSW
2045

Content:
I wholeheartedly object to the additional construction site at the end of the Bland St at the Muirs site. The original plans had the tunnels being dug from the existing sites and newly created portals. The developer should not reserve the right to overhaul the plans half way through the project and then claim that the first stage is a separate project and therefore not part of the consideration of the future project.

If indeed the project does go ahead, which I'm sure it will be approved, given drilling has already taken place at both Muirs sites on both the Ashfield and Haberfield sides of Parramatta Rd, then the following must be addressed:

- The dB ratings of concrete saws allowed to operate at night is unacceptable given the EIS forecast indicates sound will travel 100m up most surrounding streets. Police would arrest a normal resident for generating that level of noise at night. Residents have already been exposed to the concrete saw at night on the corner of Bland St in recent times and we are unable to sleep at night when this occurs. This work should only be undertaken during the day and a cap be placed on dB at night.
- a noise monitoring system should be installed on the small site (Biscotto Bathroom's) on the corner of Bland St and Parramatta road to monitor external noise.
-Vibration monitoring and reporting should take place and should be made publicly available within 1 week of the event occurring so home owners can track any damage that may have been witnessed in their homes.
- Soundproof acoustic sheds should be constructed on both sides of the road to contain all noise, including traffic coming and going to park on site, not just the construction site.
- Traffic to the carpark should only be allowed to enter off Parramatta rd. Plans show entrances off Bland St and Alt St. These should be removed to encourage all traffic to remain off local streets.
- Before anything is demolished on the Muir sites a comprehensive plan on what the sites are to be used for post construction should be submitted and clearly approved by the local government. This should clearly respect the heritage nature of the Haberfield suburb and exclude high rise development similar to

that along the rest of Parramatta road growth corridor. The plan should include a detailing landscaping concept. If this is determined to be RMS land, then joint consultation with the RMS prior to works commencing, to determine the final site usage must happen and should form part of the final submission, otherwise this is not a true environmental impact statement.
- All trucks must enter and exit on Parramatta Rd
- No worker vehicles to be parked in side streets
- All side streets directly affected by works should be resurfaced at the costs of the developer at the conclusion of construction, including but not limited to: Walker St, Alt St and Bland St on Ashfield and Haberfield sides of Parramatta Rd.
- Finally, if the plans can be changed to reconsider construction sites irrespective of separate projects, then the ventilation filtering should be once again considered for the ventilation towers. Filtration should be added and then be built into the cost for those who choose to use the road, rather than have the cost borne by the health of those in the surrounding communities.

[redacted]
Submission: Online Submission from Glen Jones (object)
https://majorprojects.accelo.com/?action=view_activity&id=228329

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent: Mon, 16 Oct 2017 10:48:49 +0000
To: [redacted]
Subject: FW: Submission Details for Michael Paddon (object)

From: system@accelo.comOn Behalf OfMichael Paddon
Sent: Monday, 16 October 2017 4:45:08 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Michael Paddon (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Michael Paddon
[redacted]

Address:
[redacted]

Rozelle, NSW
2039

Content:
I wish to object in the strongest possible terms to the proposed WestConnex M4-M5 Link as detailed in the Environmental Impact Statement (EIS). In general, I believe the project is unnecessary if the objective is to link the two motorways and that it constitutes a major misallocation of public funds. Specifically, the construction of the project, in so far as this is outlined in the documentation of the EIS, will have a fundamental and disastrous impact on local communities for at least five years. The impact of the construction and the inadequacy of the plans in the EIS are the main issues I wish to address in this submission. Finally the nature and status of the EIS make a mockery of the claims that the community is being adequately consulted in the planning of the project.
Is the M4-M5 Link Necessary and a Sound Use of Public Funds
The M4 and-M5 motorways are already linked by the M7, A6 and A3. Indeed the State's Road network hierarchy shows A3 as the primary eastern link band connector between the two motorways. The project does not actually address what has been stated to be one of the most fundamental objectives of Westconnex which is to provide better connections to Port Botany. The capital and operational costs of WestConnex will take so much of the State's public finances that it will be impossible to fund other major transport projects, including public transport in the short, medium and potentially long term.
The Impacts on Local Communities of the Construction of the Project.
In Chapter 6 of the EIS, which deals with the construction process, it is stated that one focus of the construction strategy is "minimising impacts on local communities, the environment, and users of the surrounding road and other transport networks" (6.1). Amongst the general principles of the strategy stated at 6.2 are:
* Minimise adverse changes to the safety, efficiency and accessibility of road and related transport networks (including public transport and pedestrian and cyclist paths) and ensure ongoing community access and connectivity
* Minimise impacts on parking by providing off-street parking for the construction workforce and encouraging the use of alternative transport (such as buses and light rail) to construction ancillary facilities and construction work sites, where practical

* Manage community and environmental issues including noise, access, amenity and general disruption
It is impossible to see how these principles are adhered to in the actual plans. In particular no attention is paid to the cumulative impacts on access and connectivity and amenity of the major sites at which construction will take place from 2018 to 2022/23 or later. From this point on my submission will mainly reference the Community Guide to the Environmental Impact Statement issued by WestConnex as this is both an easier point of reference and it appears to contain some detail not included in Chapter 6 of the EIS. The Balmain, Rozelle and Lillyfield areas essentially form a peninsula with Iron Cove to the North with Rozelle and White Bays to the South East. Exiting and entering this area for private and public road vehicle is only possible via a limited number of routes: Iron Cove bridge to the North East; Anzac Bridge to the East; the Crescent to the South; and Westlink to the west. Key junction points are Victoria Road at Lane Cove Bridge; Victoria Road at the Junction of Westlink and Anzac Bridge; traffic lines governing traffic from Balmain Road onto Westlink or going south-east on Darley Road. These junctions are already points for considerable traffic congestion, particularly at peak periods in the morning and afternoon/evening. Each of these exit points will be a major construction site with very considerable movements of additional traffic of smaller vehicles during peak hours and heavy vehicles in some cases over 24 hours. To take just one illustration, according to the EIS, an estimated 517 heavy vehicles will be entering the Rozelle civil and tunnel site each day. They will then also exit the site. This amounts to a vehicle leaving the site approximately every 4 minutes, 24 hours a day. The heavy vehicles will travel west on Westlink. In order for them to do so, a traffic management system, presumably with traffic lights, will need to be installed , at what appears from current diagrams to be adjacent to the Crescent. These heavy vehicles will join the 100 heavy vehicles exiting the Darley Road site which will also require a traffic management system to allow them to enter Westlink. At peak hour in the afternoon, light vehicles leaving each of the sites at these junctions surrounding the Lillyfield, Rozelle Balmain communities are : Darley Road, 70 and the Rozelle civil and tunnel site, 350. It appears from the Community Guide, that the 350 light vehicles exiting the Rozelle site will do so onto Lillyfield Road and then presumably disperse to the north west, joining the light vehicles leaving the Iron Cove site, or to the West entering Westlink and joining the light and heavy vehicles from Rozelle, the Crescent and then probably Darley Road. During the construction period for Westconnex, which will be a minimum of five years but with the real prospect of overruns which characterise almost every major construction project internationally, the communities of Lillyfield, Rozelle and Balmain will feel as though we are under siege. The questions arise: what serious consideration has been given to the impacts of these additional vehicles and the traffic management systems to facilitate them on these major junction points particularly at peak periods and what are the cost benefit assessments of the "cost" to local communities of the disruption and additional travel times using private and public transport on these roads? What consideration had been given to the cumulative impacts on these communities of the sites at Iron Cove, Darley Road, Rozelle, Victoria Road, the Crescent and Iron Cove on the communities of Lillyfield, Rozelle and Balmain?
There are also apparent discrepancies in the figures provided at different parts of the documentation: according to the Community Guide to the EIS, 140 light vehicles will enter the Victoria Road civil site but there will be 0 vehicles departing during peak hour. Table 6.25 of the main EIS indicates that there will be 200 day shift employees on the Victoria Road site but according to EIS no onsite parking facilities are being provided. The exact location of the Victoria Road site is difficult to discern from the current maps and documentation. However, this data suggestions that a considerable number of this workforce will be parking vehicles in streets around this area. So while 0 vehicles may actually leave the site, there are likely to be a considerable number of vehicles parked in local streets which will be transporting the workforce. For each site, what is required is a detailed indication of number of light vehicles likely to be used by the workforces at each site, the actual number of parking spots to be provided on site, the potential numbers parking on local streets and the number of actual vehicle movements at peak times resulting from workforce numbers.
The Community Guide and the EIS contain certain provisos: some of the details will not be available until contractors are appointed (the EIS uses a terminology CTAMP with which I am not acquainted but which I assume refers to a more detailed plan made by contractors) ; numbers of parking spots to be made available at different sites are approximate; the workforce will be "encouraged" to use public transport. These provide no adequate basis for a community response to the EIS or to actual planning for the consequences on access, connectivity or amenity
The nature and status of the EIS

These provisos in relation to vehicle and traffic movements are one illustration of a fundamental problem for the community and stakeholders in responding to the EIS. It is a statement of strategy. However, it manages to be a statement of strategy over 30 chapters, numerous appendices and several thousand pages. It is impossible for members of the community to read, understand, digest and respond to this magnitude of information. However, focussing in on one aspect of the EIS, such as the construction period, it appears that there are a lot of approximations, with broad brush statements which are lacking in the level of detail which the community needs to be able to understand precisely what the impacts will be. It would appear that the EIS has been put together rapidly without due consideration of major aspects which will impact on local communities. And at the same time, it also appears from what is stated on the Westconnex website that the tender process is already underway for the design and construction contract for the project (accessed at www.westconnex.com.au/projects/m4-m5-link on 16.10.17) This is despite the facts that the EIS is still on public exhibition following which responses will need to be generated to issues raised by submissions during the public exhibition before a final determination is made on the project by the Minister for Planning. This prompts a cynicism about the genuine character and integrity of the supposed consultation processes

[redacted]
Submission: Online Submission from Michael Paddon (object)
https://majorprojects.accelo.com/?action=view_activity&id=228191

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent: Mon, 16 Oct 2017 10:54:15 +0000
To: [redacted]
Subject: FW: Submission Details for Ian Perlman (comments)

From: system@accelo.comOn Behalf OfIan Perlman
Sent: Monday, 16 October 2017 9:54:03 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Ian Perlman (comments)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Ian Perlman
[redacted]

Address:
[redacted]

Annandale, NSW
2038

Content:
Attn: Secretary, re: WestConnex M4/M5 EIS, Project Number SSI 16_7485.

SUBMISSION OF OBJECTION TO WESTCONNEX M4/M5 LINK EIS.

I strongly object to the Rozelle Bay Interchange component of this scheme and urge the Secretary of Planning to advise the Minister to refuse the application on the grounds below. NSW Planning must require the Proponent to properly and adequately address the impacts set out below which are not adequately addressed in the EIS.

The EIS states `the detail of the design and construction approach is indicative only based on a concept design and is subject to detailed design and construction planning to be undertaken by the successful contractors.' The community will have no opportunity to comment on the Preferred Infrastructure Report which forms the basis of the approval conditions. Key decisions have been left open in this EIS. Not to allow consultation on the final choice of construction sites would further compromise an already inadequate consultation process.

Those are my general grounds for objection. However, should the works progress I here present two specific matters of concern to my residential area (the north end of the ridge surrounding Annandale Street).

1. Traffic noise/ Whites Creek trees.

The mature tree planting along Whites Creek leading to Buruwan Park is currently an effective safeguard against City West Link traffic noise for all residents of this sector. Some of those trees (in Buruwan Park) would also serve to shield many of us from the site of the proposed ventilation stacks. However Buruwan Park seems slated to disappear as that small section of public land is subsumed into the coming

interchange, which will have immediate impact on our contour-terraced streets. Erection of roadside sound walls will not compensate for the loss of the trees. You will no doubt also receive submissions reading wildlife along this rare continuous sliver of bushland.

2. Imposition of traffic lights and tunnel entrance road proposed north of the Light Rail line closest to the junction of Brenan Street and Railway Parade.

The installation of traffic lights at this point will result in an uncomfortable increase in noise and smog as vehicles stop, start and change gears. This will be audible and perceptible to all residents on the streets on the north/ west side of the ridge, between Annandale Street and Railway Parade/ Brenan Street.

General concerns, expanded:

As an architect and urbanism academic (University of NSW) with extensive site experience on major roadworks in residential zones comparable to WestConnex (notably Osaka, Hong Kong, Los Angeles and Rio de Janeiro) I am seriously perturbed by the anticipated effects on local quality of life, on property values, and on the heritage integrity of this precinct, which has risen in critical appraisal in the last two decades to `Ideal Suburb' status. Community cohesion is substantial, and many families with children have chosen this area, supporting a local economy.

I do not dispute the need to improve the flow of traffic west of the CBD. Nevertheless, I am unconvinced about the necessity of locating this interchange so close to the harbour and indeed the CBD. SMC was required to consider alternatives. This section in the EIS is tokenistic. The City of Sydney has proposed an alternative plan that I find credible which has been ignored in the EIS. The SMC should be required to engage with this plan and to respond to it. Any responsible system of governance would require this much.

The EIS shows that traffic on the City West Link, Johnston Street, The Crescent, and Catherine and Ross Streets would greatly increase during the construction period and also be greatly increased as Stage 3 is completed. It indicates that Stage 3 would do nothing to improve traffic congestion in the area, but will in fact add to the problem. Many of these areas are already congested at peak times. Even the EIS recognises that this would have a negative impact on the local area as more and more people try to avoid the congestion by using rat runs through local streets.

I am concerned that the traffic figures relied upon in the EIS are simply not reliable. AECOM, the company responsible for this EIS, has a well-documented record of wrongly predicting traffic. Already there are reports that the traffic for all stages of WestConnex has been overestimated and construction costs underestimated. (SMH 'Pressure builds on government to sweeten WestConnex sale' 5/10/2017)

Sydney Motorway Corporation has not been able to identify any other similar underground interchange project anywhere in the world or find a construction company to build it. This EIS should be rejected because it would be absurd to approve such a design concept without evidence that it could be constructed.

Regarding the ventilation stacks I note that the declaration by the Education Minister Rob Stokes in 2017 that "No ventilation shafts will be built near any school" in his electorate. The same caution should be applied in all areas of Sydney. The government needs to do more to reassure affected residents of its seriousness in this health matter, particularly considering that the World Health Organisation in 2012 declared diesel particulates carcinogenic.

In this and other matters the WestConnex proposal has forced residents such as myself to self-educate and closely study news. Along with the notoriously corrupted process around resumption of the Dan Murphy's site in Leichhardt and the dismissal of the City of Sydney plan, Citi financial analysts reports regarding anticipated toll avoidance and the advent of the western Sydney airport have made me skeptical of the traffic analysis on which WestConnex bases its case. In this situation, it would be

negligent for NSW Planning to approve this project.

There is reference in the EIS to the WestConnex Road Traffic Model version 2.3 (WRTM v2.3), a strategic traffic model that has been used in the traffic analysis. This model was developed by the NSW Roads and Maritime Services who have constantly pushed a motorway agenda to the disadvantage of the development of more public transport. There is insufficient explanation of the nature of the model, where it can be accessed and what function it plays in the analysis. There is no clear explanation of how the assumptions that underpin the WRTM have changed between EIS stages. Since so much else in the EIS including noise and air quality predictions are dependent on this forecasting, the lack of transparency makes it difficult for the EIS to be subject to independent critique.

There are overlaps in the construction periods of the New M5 and M4 of up to one year. This will significantly worsen impacts for residents close to construction areas. No additional mitigation or any compensation is offered for residents for these periods.(Executive Summary xxvii). It is unacceptable that residents should have these prolonged periods of exposure to more than one project. The EIS makes no attempt to seriously research the current impacts on residents, measure what the cumulative impacts would be or make suggestions that would mitigate the cumulative impact of these prolonged periods of construction noise exposure.

The EIS identifies a significant risk of leaks of contaminated water into Rozelle Bay (and, elsewhere, Alexandria Canal). Such risks to health of Sydney's waterways is not acceptable to me. The Sydney Motorway Corporation through its conduct at St Peters has not demonstrated assurance to manage contamination risks. The NSW EPA should not grant any further licenses that would allow such events to occur.

I further object to the EIS on the grounds that it fails the Secretary's requirement for "meaningful" consultation. Hundreds of residents within the proposed project zone were not effectively notified of feedback sessions. Hundreds of submissions on the concept design, especially a major one from the Inner West Council, were apparently ignored. The heritage report downplays potential impacts on hundreds of homes from Newtown to Annandale and Rozelle which are part of our city's valued history. This report is incomplete and should not be accepted.

NSW Planning should reject this EIS and recommend a halt to the planning process while there is an independent review of WestConnex before more billions are spent and more residents' lives are affected. Local residents, Councillors and potential investors have queried the information supplied by the Sydney Motorway Corporation and NSW Roads and Maritime Services. In this situation, it would be reckless and unprofessional of NSW Planning to rubber-stamp this inadequate document.

I urge the Secretary of NSW Planning to advise the Minister to reject this EIS as it stands, and to provide a written response to the concerns I have raised.

Yours sincerely,
Ian Perlman
31 Bayview Cres, Annandale NSW 2038, Australia

[redacted]

Submission: Online Submission from Ian Perlman (comments)
https://majorprojects.accelo.com/?action=view_activity&id=228333

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent:
To:
Subject: FW: Submission Details

From: system@accelo.comOn Behalf Of[redacted]
Sent: Monday, 16 October 2017 9:57:10 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Name: [redacted]
Email:

Address:
[redacted]

[redacted]

Content:
I am not happy with the Westconnex's Option B plan for a construction site less than 200m from Haberfield Public School. This will have significant adverse impacts on our children's health, safety and learning. This is totally unacceptable.

IP Address: [redacted]
Submission: Online Submission from [redacted](object)
https://majorprojects.accelo.com/?action=view_activity&id=228339

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent: Mon, 16 Oct 2017 11:00:24 +0000
To: [redacted]
Subject: FW: Submission Details for Catherine Dornan (object)

From: system@accelo.comOn Behalf OfCatherine Dornan
Sent: Monday, 16 October 2017 9:58:02 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Catherine Dornan (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Catherine Dornan
[redacted]

Address:
[redacted]

Henley, NSW
2111

Content:
I strongly OBJECT to the proposal to construct unfiltered tunnel ventilation outlets in the vicinity of Rozelle Public School.

I OBJECT to and am appalled by the lack of consultation, the lack of rigorous research, and the total disregard for community opinion throughout the "planning" and construction of the entire WestConnex project. This project is tearing the fabric of Sydney apart - destroying homes, dismantling communities, knocking down and ripping up anything that stands in the way of the folly that is WestConnex.

I am concerned for the health and safety of the children living in the area of any unfiltered smokestack, and the impact on the wellbeing and education of children attending Rozelle Public School. My two children, aged 4 and 6, attend the school and it horrifies me to think that they face undertaking the entirety of their primary schooling in close proximity to a major construction site, and be subject to unacceptable levels of noise and fatal levels of pollution. Would you want that for your children?

This project appears indicative of the current Government's disinterest in the wellbeing of people beyond the delivery of votes. What good is governing if you completely ignore the wellbeing of over a hundred communities across Sydney?

Government should be protecting its citizens from any attempt to rationalise harm. How can a Government put a dollar value on the life of one of its children? And why is a child's life in Lane Cove worth more than one anywhere else in Sydney?

The cost of WestConnex is a shameful waste which will not deliver. So much could still be done to improve transport in Sydney if this project is halted.

Please stop this project. Please accurately research the full effects of this madness, and listen to our

concerns before it is too late.

[redacted]
Submission: Online Submission from Catherine Dornan (object)
https://majorprojects.accelo.com/?action=view_activity&id=228341

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent: Mon, 16 Oct 2017 11:03:23 +0000
To: [redacted]
Subject: FW: Submission Details for Victoria Whitby (object)

From: system@accelo.comOn Behalf OfVictoria Whitby
Sent: Monday, 16 October 2017 5:00:01 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Victoria Whitby (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Victoria Whitby
[redacted]

Address:
[redacted]

Waterloo, NSW
2017

Content:
I am writing to object to the current Westconnex Stage 3 plan.
I support the alternative proposal as published on the City of Sydney website which services the Airport and Port Botany. The congestion in this City is currently one of the worst in the developed world. We are building a light rail, and yet ploughing 1.8bn into developing roads that will take major thoroughfares of traffic through already congested newly developed residential areas.
There must a better solution that may take longer to produce and plan but will provide a more sustainable transport network to service Sydney and NSW.

[redacted]
Submission: Online Submission from Victoria Whitby (object)
https://majorprojects.accelo.com/?action=view_activity&id=228217

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent:
To:
Subject: FW: Submission Details

From: system@accelo.comOn Behalf Of [redacted]
Sent: Monday, 16 October 2017 10:04:02 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Name: [redacted]
Email: [redacted]

Address:
[redacted]

[redacted]

Content:
I make the following submission in response to the EIS for the M4-M5 Westconnex Link. I strongly object to this project. I raise the following concerns ;
1) I strongly Object to The use of construction option C3a Northcote Street site..As the neighbour we do not want to be disturbed by continuous 24/7 noise,impact/vibrations and continuous sleep disturbance as per M4 East project.
2)Once again a breach of trust as the M4 East was to be completed and areas handed back by 2019. NOW the construction will continue Until at least 2022, with 24/7 tunelling works.
3) Traffic and Parking in Haberfield would significantly increase including heavy trucks for spoil movements. Light vehicles will dramatically increase as workers utilise parking lot proposed at C3a as per EIS. With this increase comes more unwanted disturbances.
4) Exhaust stacks : I strongly oppose unfiltered exhaust stacks in the local community and i am very concerned about the lack of data on the cumulative impacts on air quality of both the M4 East and M4-M5 Westconnex Link.
5)Lack of Clarity : many sections in the EIS are just indicative and not final. As per the statement " will be determined during final detailed design" This M4-M5 link ambiguity, does not allow me to completely understand and respond to major impacts and concerns.

IP Address: [redacted]
Submission: Online Submission from [redacted](object)
https://majorprojects.accelo.com/?action=view_activity&id=228343

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent:
To:
Subject: FW: Submission Details

From: system@accelo.comOn Behalf Of[redacted]
Sent: Monday, 16 October 2017 10:11:03 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Name: [redacted]
Email:

Address:
[redacted]

[redacted]

Content:

To whom it may concern,
I am deeply concerned about the west connex stacks that are going to be near us at Victoria Rd, Rozelle, and apparently unfiltered! I cannot believe this and do not even want the west connex at all but certainly we do not want to be doubly polluted as well. If this project goes ahead please ensure we are all protected from the toxic fumes to the best international standards.
Our childrens health is at stake.
Sincerely
[redacted]

IP Address: - [redacted]
Submission: Online Submission from [redacted] (object)
https://majorprojects.accelo.com/?action=view_activity&id=228345

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent: Mon, 16 Oct 2017 11:15:46 +0000
To: [redacted]
Subject: FW: Submission Details for Jeremy Bluhm (object)

From: system@accelo.comOn Behalf OfJeremy Bluhm
Sent: Monday, 16 October 2017 10:15:36 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Jeremy Bluhm (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Jeremy Bluhm
[redacted]

Address:
[redacted]

Balmain, NSW
2041

Content:
I object to the Westconnect project. I feel it is an outdated approach to transportation. More roads will lead to more cars, which will only result in more congestion and more cars trying to enter the centre of Sydney. A freeway leading into the city will simply end in a bottleneck where many lanes turn into a few.

There will be significant environmental impacts, including noise during the construction,. fumes from the exhaust towers, and increased carbon emissions due to more cars.

I recommend that the whole project be stopped.

[redacted]
Submission: Online Submission from Jeremy Bluhm (object)
https://majorprojects.accelo.com/?action=view_activity&id=228347

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent: Mon, 16 Oct 2017 11:29:16 +0000
To: [redacted]
Subject: FW: Submission Details for Nadine Carrick (object)

From: system@accelo.comOn Behalf OfNadine Carrick
Sent: Monday, 16 October 2017 10:29:05 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Nadine Carrick (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Nadine Carrick
[redacted]

Address:
[redacted]

Ermington, NSW
2115

Content:
I, like many others, have grave concerns about the environmental and health impacts that adding thousands of cars to Sydneys' roads will have. Not only do I have these concerns, I also wonder how the city roads in the CBD itself will be able to cope with the extra traffic. These toll roads will undoubtably make it easier(albeit expensive) to travel along the north-south and east-west routes of our city, however, surely a large percentage of the profits from these toll roads should go into funding public transport infrastructure and an excellent public domain into perpetuity. I don't believe private corporations should be able to hoard these profits when the constituents (and their children) of Sydney will be the ones bearing the burden of the noise, air and visual pollution that roads of this scale bring, not to mention the continuing social inequity that follows from car-centric city-making schemes like Westconnex.

[redacted]
Submission: Online Submission from Nadine Carrick (object)
https://majorprojects.accelo.com/?action=view_activity&id=228357

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent: Mon, 16 Oct 2017 11:55:36 +0000
To: [redacted]
Subject: FW: Submission Details for company Haberfield Association Inc (org_object)
Attachments: 228355_Haberfield Association WestConnex Stage 3 EIS Submission_2017Oct16_2221.pdf

From: system@accelo.comOn Behalf OfHaberfield Association Inc Company
Sent: Monday, 16 October 2017 10:22:16 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for company Haberfield Association Inc (org_object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Haberfield Association Inc Company
Organisation: Haberfield Association Inc (WestConnex Liaison Officer)
Govt. Agency: No
[redacted]

Address:
[redacted]

Haberfield, NSW
2045

Content:
The Haberfield Association submits the attached objection to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons stated in the attached submission, and call on the Minister to reject the application.

We request that Secretary of NSW Planning advise the Minister to reject this EIS, publish the Haberfield Association's submission in accordance with the undertaking on your website, and provide a written response to each of the objections we have raised.

[redacted]
Submission: Online Submission from company Haberfield Association Inc (org_object)
https://majorprojects.accelo.com/?action=view_activity&id=228355

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

Department of Planning and Environment
Attn: Director, Transport Assessments
GPO Box 39
Sydney NSW 2001

Submission on behalf of the Haberfield Association on Westconnex Stage 3 EIS. - Planning Application SSI 7485.

16 October 2017

Dear Sir/Madam,

The Haberfield Association was formed in 1980. It has a long history of promoting civic pride in the Federation Garden Suburb and protecting and cultivating its heritage. The suburb of Haberfield forms part of the vital and changing city of Sydney. However, we do not believe that such changes should be detrimental to the residents of Haberfield who themselves, ipso facto, are residents of Sydney. We believe that all Sydney residents should benefit from change and none should be disadvantaged.

The Association acknowledges the profound negative impact on the Haberfield community and its heritage character of the Westconnex Project. The suburb has been divided physically and many Federation homes have been destroyed. Residents have been displaced. Years of work to restore properties have been laid to waste.

The Haberfield Association submits this objection to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the following reasons, and ask that the Minister reject the application.

1. Our objections are due to concerns including:

Dust,
Vibration,
Noise,
Road closures,
Pedestrian detours,
Traffic detours,
Road traffic controllers,
Smells,
Fumes from surface generators, trucks and additional vehicles,
Utility relocations,
Out of Hours Work

2. Haberfield residents have endured enough

The impact of WestConnex M4 East construction on residents of Haberfield is serious and profound. Residents are being impacted by the loss of heritage, loss of vegetation, vibration, the visual destruction of neighbourhood, noise and traffic congestion caused by hundreds of trucks a day travelling through the

neighbourhood, dust, the destruction of properties and businesses, loss of recreation space, stress, loss of sleep and health problems. Many residents will experience these impacts for four or more years and some permanently.

From early 2016, residents have endured the M4 East demolition and construction activity, with tunnelling and truck movements now at peak. Since 2013, residents have had to live with uncertainty and the consequences of residential and commercial acquisitions for the M4 East.

The impact of noise from construction, particularly after hours work, including utilities work and truck movements is of particular concern. Many residents are experiencing sleep disturbance over many nights over years. Some are being affected by noise and disruption from being in proximity to more than one construction site.

Significant numbers of breaches of M4 East approval conditions by contractors are reported, most often with no remedy forthcoming.

The construction periods of the proposed Stage 3 overlap with Stage 1 for around six months. The EIS acknowledges that a considerable part of the proposed construction of Stage 3 will overlap with the construction of the M4 East, but fails to deal with it in any meaningful depth. Residents close to construction areas will encounter significantly worse impacts. The EIS offers no additional mitigation or any compensation for residents for this periods. It is unacceptable that residents should have prolonged periods of exposure to more than one project.

The lived experience of residents from the M4 East project has been that the predicted modelling of impacts was flawed. Many residents were told that a variety of projects undertaken would have no impact on them. Engineers continually expressed surprise that residents could hear work and would be awoken at night by work 400-500 metres away. The reasons for this problem are unclear and the EIS does not offer any explanation or mitigation.

The EIS has not attempted to seriously evaluate what the total cumulative impact of this devastation will be on the community. There appears to have been:

- no serious research into the current impacts on and lived experiences of residents of the M4 East construction
- no serious attempts to measure the cumulative impacts or make concrete suggestions that would substantially mitigate the cumulative impact of these prolonged periods of construction.

It is intolerable that residents in Haberfield should experience such negative impacts over the length of two projects, over eight years.

3. Complaint fatigue

While the EIS addresses construction fatigue it does not address complaint fatigue. This is the experience residents have, when they have legitimate complaints about dust, noise or other pollution, is one of slow response and often no response. If the communication team is pushed, the team member is often irritated by the complaint

probably because they cannot do anything about it. The most common response is a cut and paste email that states that the EPL licence allows such unreasonable noise or other intrusion.

An independent and co-ordinated complaints system should be established, under the jurisdiction of Local Councils. The Inner West Council has proposed operating such a system but any system must be fully integrated so complaints are taken seriously and followed-up to give some level of satisfaction to the residents.

4. We were PROMISED 'NO Stage 3 above ground construction sites in Haberfield/Ashfield'

Haberfield and Ashfield residents were promised that construction of the M4 East would be completed in 2019 and that any further work for Stage 3 would be completed using facilities underground. This was CONFIRMED again in June 2017 at the Concept Design Consultation Session at Haberfield where it was explained the Acoustic Shed would be underground, and that spoil trucks would leave via the M4 East tunnels.
It is intolerable that Haberfield and Ashfield residents would be exposed to a five further years of the atrocious impacts of WestConnex due to the proposed M4-M5 Link.

The M4-5 Link EIS suggests two options for construction sites in Haberfield/Ashfield, options A and B, with three sites proposed as part of each option. The EIS suggests a choice between Option A and Option B, but as the Muir's site has now been purchased, it would appear that a decision has already been made?

It appears that up to six construction sites will be used in the Haberfield/Ashfield area. This potential was been confirmed in discussions at WestConnex consultation sessions with some of our Association members.

The EIS summarises the Haberfield/Ashfield Option A and B in a way that it appears there is a simple choice between 2 Construction Options, each proposing to use 3 sites. However, a closer reading and examination of tables & figures, reveals that the EIS is proposing approval of all six construction sites, with their use to be determined by the project builder after approval has been granted.

Instead of above-ground construction sites, tunnelling should occur completely underground using the newly created M4 East tunnel and stubs as the access point for the M4-M5 link as has been promised. It is both feasible and reasonable that residents should not have to endure any further above ground construction associated with WestConnex Stage 3. At Consultation sessions for the Stage 3 EIS, project team staff have conceded it is feasible to construct Stage 3 without additional above ground construction sites in Haberfield/Ashfield as promised.

Haberfield residents were promised that if the Stage 3 was approved, the fit out of the exhaust stack at the Parramatta Road Ventilation Facility, and underground sites near Wattle St, Parramatta Rd and Ramsay St, would be the **only** sites used for Stage 3 construction in Haberfield.

Although not discussed in the EIS, SMC have confirmed other options under consideration include flipping the Parramatta Road West and East sites so that the tunnelling occurs on the Haberfield side, or having a bridge or tunnel or shaft with a conveyor belt built over Parramatta Road to carry spoil across one of Sydney's busiest roads. How can we be expected to comment on a proposal when options under consideration are not included in this EIS?

We object to any approval allowing a contracted project builder to decide, post-approval the detailed design and management of sites including when where and how to establish and operate any of the Option A or B sites outlined in the M4-5Link EIS . We expect that no government authority would agree that planning decisions that could result in major impacts on the health and quality of life of people should be made without public feedback and Independent analysis.

5. Traffic Impacts of spoil removal and other traffic should be minimised

Haberfield residents are affected by hundreds of truck movements each day from the M4 East, particularly residents on Wattle St. Continued removal of spoil from the M4-M5 link along predominantly above ground spoil haulage routes would continue to impact negatively on local residents until 2022.

The EIS confirms a major impact of Option B upon all streets off Parramatta Rd due to the proposed Parramatta Rd West and Parramatta Rd sites. It also advises of major impacts in Bland St, from Parramatta Rd to Denman Ave. Of major concern is traffic in Bland St considering the 3 main entrances to Haberfield Public School in Bland St, between Parramatta Rd and Denman Ave. The EIS indicates that substantial extra traffic on Alt and Bland streets could affect road safety for children at Haberfield Public School. This risk to our children's safety is totally unacceptable.

Responding to residents concern about heavy vehicles on a busy local road, SMC has reduced the planned spoil haulage hours at Darley Road. The EIS proposes the spoil haulage hours under Option A and Option B in Haberfield/Ashfield to be 24/7. We request that similar notice be taken of our concerns about noise, dust and traffic congestion on local roads and that spoil haulage hours be reduced in Haberfield/Ashfield.

The EIS figures for truck movements indicate that Haberfield/Ashfield will endure in excess of 750 truck movements per day on Parramatta Rd and WestLink/Dobroyd Pde/Wattle St apart from the several hundred from sites in the Haberfield/Ashfield area. The use of the underground acoustic shed and construction sites at Haberfield would allow the trucks used for spoil removal from the Haberfield end of the Stage 3 to proceed underground via the M4 East tunnel.

Our Inner West Council advises that many roads in Haberfield will be used for "rat-running," causing an unfair noise and traffic burden on Haberfield residents.

At an information session SMC staff advised that the truck route for Option B includes trucks using Liverpool Rd and passing through Ashfield shopping centre. This is an ill-considered proposal and a common sense should be adopted.

6. Air Pollution from Generators and Exhaust Stacks is Unacceptable

The EIS confirms that the proposed exhaust stacks at Haberfield will be unfiltered. The Inner West Council's consultants (BECA) have advised that on a still day the unfiltered fine particulate matter and diesel vehicle emissions from the stacks would drift and that these could discharge exhaust pollution onto our residents' homes, our schools and our nursing homes.

Experience from M4 East indicates that a large number of diesel generators will be used and many of these run 24 hours per day, seven days a week.

These sources of air pollution put the occupants of our residents' homes, our schools, our day care centres and our nursing homes at an unacceptable health risk

The 2015 Woolcock Institute report "Review of the health impacts of emission sources … in NSW" prepared for the NSW EPA & NSW Ministry of Health advises:
"the evidence presented in this report suggests that exposure to levels of PM that currently exist in NSW will have measureable adverse impacts on health, particularly in vulnerable people such as individuals with chronic respiratory and cardiovascular diseases, the elderly, and children. Reductions in PM air pollution in NSW are likely to result in health benefits, particularly for these most vulnerable groups.

The World Health Organisation has stated that there is no safe level of exposure to fine particulate matter and diesel exhaust emissions. Other developed countries are already regulating the use of diesel and are introducing measures to stop increases in poor air quality. We object to the health impacts of unfiltered ventilation stacks and construction generators in proximity to our school and to the school families who live in the area impacted by fall out from these sources.

As part of the conditions of any approval, there be no use of off road diesel generators.

Further, any approval must include a requirement that the exhaust stack at Parramatta Rd/Wattle St be filtered to limit the level of toxic vehicle emissions released into the atmosphere. We cannot understand why, if the NSW government is spending billions of dollars on this project, it cannot afford to filter the stacks to ensure the least amount of harm is done to those who will breathe this air.

7. No Compulsory acquisition of homes, commercial property or greenspace.

We understand that the Muir's sites on both sides of Parramatta Rd have been acquired by SMC. There should be no further compulsory acquisition of homes, commercial property or greenspace. The other commercial properties on the South/West side of Parramatta Rd should NOT be acquired and instead negotiations should be undertaken with Muir's to return their sites. About 150 homes and commercial properties were destroyed in Haberfield and Ashfield for the M4 East and there has been significant loss of local vegetation and green space. Haberfield should NOT lose any more!

8. The "Indicative only" basis of the EIS is totally unacceptable

The EIS advises "the detail of the design and construction approach is indicative only based on a concept design and is subject to detailed design and construction planning to be undertaken by the successful contractors" making much of the content quite unreliable and useless.

On that basis, NSW Planning must reject the proposal which does not contain any certainty for residents as to what is planned. It provides no proper basis on which the proposal can be approved. The indicative basis of the EIS is a breach of proper process and fundamentally unreasonable. Residents do not have the opportunity to review the final design of the project and this appears to be a deliberate action to ensure residents are not informed. This isn't a consultation process as we cannot understand the full implications of the project.

If WestConnex is sold following any approval of this EIS, the private owners and their contractors will be handed unrestricted control of the final design and implementation of Stage 3. It would be irresponsible to allow that to happen.

If it did, the contractor would not have to take into account community feedback. The contractor would be trying to deliver the project at the lowest cost possible, and no consideration would be given to construction noise mitigation or any of the other impacts on local residents. The EIS should be refused on the basis that it does not provide a clear definition of the project.

9. Urban design and landscaping/community connectivity

The EIS does not include more proposals to improve the urban design and community connectivity in the Haberfield region, which has been decimated by the WestConnex development. The EIS, Community Guide and other material promote the urban design work proposed for the Rozelle and Iron Cove section of the project. However, it appears that Haberfield and surrounding areas of Five Dock and Ashfield have been overlooked. We residents of this area will live with two enormous tollway/portal roads dividing our communities at Parramatta Road and Wattle St.

We request that this project focuses again on the Haberfield/Ashfield/Five Dock regions and develops improved plans for pedestrian and cycling activity. In particular, that the project improves the links across Wattle St/City West Link between Haberfield and Five Dock including an overpass to ensure safety of students and families who cross here to get to/from school, and creates more pedestrian/cyclist crossings across Parramatta Road.

10. "Preferred Infrastructure Report" must be released for public comment BEFORE final approval

We understand that the Preferred Infrastructure Report (PIR) is being written by the Stage 3 proponents. The PIR must be publicly released - with adequate time for public scrutiny and comment - BEFORE any assessment or approval of the Stage 3 Proposal.

It is expected that the Preferred Infrastructure Report will include design details that should have been included in the EIS. It is expected to include plans that will have very significant impacts upon residents and community. The PIR is particularly relevant to Haberfield and Ashfield residents as it would provide detailed information about the above-ground construction sites to be used in Haberfield. The EIS does not provide specific details on which or how many of the six construction sites that would be used in Haberfield.

11. The EIS does not seriously consider alternatives

The Secretary's requirements advise that the EIS is required to provide an analysis of alternatives, including public transport alternatives. The EIS does not meet this requirement. There is general discussion about the need for the project without any detailed analysis of why other solutions including the proposal by the City of Sydney could not be considered. Given the extremely high cost of this project, a detailed analysis of potential alternatives is required.

12. Lack of consultation

There is a Secretary's requirement for "meaningful" consultation, but the EIS fails to meet that requirement. The EIS is such an unwieldy and complicated document that it is almost impossible for a lay person to understand sufficiently to make considered judgements on all of the matters raised. Ours submission represents the Haberfield Association's best efforts to comment on the material in the EIS.
We note that the EIS submission period included two weeks of school holidays, which severely constricted the time the residents could use to consult internally, liaise externally and prepare our response.

13. In Conclusion

We therefore request that Secretary of NSW Planning advise the Minister to reject this EIS, publish the Haberfield Association's submission in accordance with the undertaking on your website, and provide a written response to each of the objections we have raised.

From: [redacted]
Sent: Mon, 16 Oct 2017 12:10:14 +0000
To: [redacted]
Subject: FW: Submission Details for Zoe C (object)

From: system@accelo.comOn Behalf OfZoe C
Sent: Monday, 16 October 2017 11:10:04 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Zoe C (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Zoe C
[redacted]

Address:
[redacted]

Summer Hill, NSW
2130

Content:
My name is Zoe. I'm 8 years old. I'm really upset. I was in Sydney Park and I saw Westconnex cutting down Melaleuca and Eucalyptus trees. But the main reason I'm upset is because the trees are home to birds. I saw the birds flying around in circles, looking lost, confused and stressed. They would be very sad. Is there anything you can do to save the birds and the trees?

[redacted]
Submission: Online Submission from Zoe C (object)
https://majorprojects.accelo.com/?action=view_activity&id=228367

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent: Mon, 16 Oct 2017 12:25:19 +0000
To: [redacted]
Subject: FW: Submission Details for Brian Malligan (object)

From: system@accelo.comOn Behalf OfBrian Malligan
Sent: Monday, 16 October 2017 11:25:08 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Brian Malligan (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Brian Malligan
[redacted]

Address:
[redacted]

Sydney, NSW
2203

Content:
Hi there,
After reviewing all the documentation provided by State Government and other parties I do not believe the West Connex will provide the great benefits advised by the NSW State Government.

I'm against the project for the following reasons:

Substantial costs to the taxpayers including cost blowouts already.

NSW Government not listening to councils regarding modifications for stages 2 and the proposed stage 3.

Expensive tolls to be paid by motorists-forcing families to reduce their spending on essential items.

Substantial tolls for small business owners forced to use the West Connex. Their costs will be offloaded to the consumer making goods/services more costly.

Health and Environmental issues- lack of proper analysis of exhaust fumes, cheap smoke stack option selected and locations near schools/homes.

Lack of proper consultation by the NSW State Government and Sydney Motorway (set-up to construct the work). Costs are not advised properly and are always "commercial-in-confidence." There needs to be an open and honest dialogue with the local councils and the community.

Properties are being forcibly acquired by representatives of the NSW Government. Owners are forced to accept under the true market rate. This must change now.

The dumping of large amounts of traffic at the so-called St Peters interchange is outrageous. This needs

to be revisited and proper community consultation provided.

Correctly planned and designed public transport would be a far better and cost- effective course of action (and not vandalise the existing heavy rail network).

[redacted]

Submission: Online Submission from Brian Malligan (object)
https://majorprojects.accelo.com/?action=view_activity&id=228369

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: BRIAN MALLIGAN
	Address: 230 WARDELL RD
Application Number: SSI 7485	Suburb: DULWICH HILL Postcode 2203
Application Name: WestConnex M4-M5 Link	Signature: B. Malligan

*Please **include** my personal information when publishing this submission to your website*
***Declaration**: I **HAVE NOT** made any reportable political donations in the last 2 years.*

I object to the whole of the WestConnex Project, and the specific WestConnex M4-M5 Link proposals as contained in the EIS application, for the following reasons, and request the Minister reject the application.

a) The increased amount of traffic the M4-M5 Link will dump on the roads to and from the St Peters, Haberfield and Rozelle Interchanges will disrupt local transport networks including bus and active transport (walking and cycling)

b) There are overlaps in the construction periods of the New M5 and M4 of up to one year. This will significantly worsen impacts for residents close to construction areas. No additional mitigation or any compensation is offered for residents for these periods. (Executive Summary xxvii). It is unacceptable that residents should have these prolonged periods of exposure to more than one project. The EIS makes no attempt to measure or mitigate the cumulative impact of these prolonged periods of construction noise exposure.

c) Out of hours work - Pyrmont Bridge Road site - Up to 14 'receivers' at this site are predicted to have impacts from high noise impacts during out of hours work for construction and pavement works for approximately 2 weeks caused by the use of a rock-breaker. Again, no plans to relocate or compensate residents affected is provided in the EIS (EIS, XV) The only mitigation contained in the EIS is that the use of the road profiler is to be limited during out of hours works 'where feasible.' (Table 5-120) In other words, there is no mitigation whatsoever for residents affected by daytime noise and a possibility that they will be similarly affected out of hours where the contractor considers that it isn't feasible to limit the use of the road profiler. This represents an inadequate response to managing these severe noise impacts for residents.

d) Targets for renewable energy and offsets are unclear

e) Noise from trucks entering and exiting the site - Pyrmont Bridge Road site - The EIS states that there will be noise 'exceedances' for trucks entering and exiting the site (Table 5-120) No detail is provided as to the level of any such 'exceedance'. Nor does it propose any mitigation other than investigations into 'locations' where hoarding above 2 metres can be utilized to control trucks in the queuing area. This does not result in any firm plans to manage the noise. Nor is enough detail provided so that those affected can comment on the effectiveness of this proposed mitigation measure

f) Increased traffic on Bridge Road, Wattle Street and the Western Distributor will reduce the amenity and value of the investment in the renewal of the Fish Markets and renewal of the Bays Market District

g) Despite the promise of the WestConnex business case, Parramatta Road remains a barrier to urban revitalisation. There is no discussion of this commitment in the EIS.

From: [redacted]
Sent: Mon, 16 Oct 2017 12:31:27 +0000
To: [redacted]
Subject: FW: Submission Details for Malachy Ward (object)
Attachments: 228373_Stage 3 EIS Submission_2017Oct16_2330.pdf

From: system@accelo.comOn Behalf OfMalachy Ward
Sent: Monday, 16 October 2017 11:31:13 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Malachy Ward (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Malachy Ward
[redacted]

Address:
[redacted]

Haberfield, NSW
2045

Content:
I am making the attached submission in response to the Environmental Impact Statement for the M4·M5 WestConnex Link.
I wish express my strong objections and concerns about this project as detailed in the attachment.

I therefore request that Secretary of NSW Planning advise the Minister to reject this EIS, publish my submission in accordance with the undertaking on your website, and provide a written response to each of the objections I have raised.

[redacted]
Submission: Online Submission from Malachy Ward (object)
https://majorprojects.accelo.com/?action=view_activity&id=228373

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

I am making the following submission in response to the Environmental Impact Statement for the M4·M5 WestConnex Link.
I wish to raise my strong objections and concerns about this project including:

LACK OF CLARITY:
The "indicative" aspects of the EIS provide little clarity on how the project will impact affected communities. I object to the fact the EIS has been released only weeks after closing submissions for the design concept plans.

UNFILTERED EXHAUST STACKS:
The neglect of not filtering the exhaust stacks puts local community at significant health risk. The EIS identifies the schools, day care centres and nursing homes in our area but accepts the risk to the health to our children and elderly. On a project spending many tens of billions of dollars, the cost of filtration is quite insignificant and this omission in unacceptable.

CONSTRUCTION:
It is proposed that construction in Haberfield will continue until at least 2022, with 24/7 tunnelling set to continue for years. This is a breach of the assurances given to the Haberfield community, which was that construction for WestConnex would finish in 2019.

SITES:
The construction options proposed in the EIS are unacceptable. Our community has endured years of noise, dust and disruption, with minimal enforcement of the conditions of approval.
In the Concept Design Community Consultations, we were promised there would be NO ABOVE GROUND construction sites in Haberfield.
SMC has reduced the planned spoil haulage hours at Darley Road responding to residents demands. We residents of Haberfield demand the same reduction.
At minimum, construction times must be significantly reduced and there must be proper coordination of contractors and agencies to ensure minimal impact of noise and dust for affected residents.

TRAFFIC:
Westconnex Stages 1 & 3 will significantly increase local traffic in Haberfield including spoil removal via heavy trucks and light vehicles used by contractors and workers.

PARKING:
While some parking is proposed for workers, they are either inadequate or many workers choose not to use the car parks but instead park on our streets. Inevitably contractors vehicles also end up parked on our streets.

ALTERNATIVES:
The planning department must investigate alternatives that mitigate the disaster which we have experienced in stage 1 of WestConnex without further impacting the inner west community.

PREFERRED INFRASTRUCTURE REPORT:
The Preferred Infrastructure Report must be made available to the public to allow adequate scrutiny and comment.

CONCLUSION:
I therefore request that Secretary of NSW Planning advise the Minister to reject this EIS, publish my submission in accordance with the undertaking on your website, and provide a written response to each of the objections I have raised.

From: [redacted]
Sent:
To:
Subject: FW: Submission Details

From: system@accelo.comOn Behalf Of[redacted]
Sent: Monday, 16 October 2017 11:35:06 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Name: [redacted]
Email:

Address:
[redacted]

[redacted]

Content:
SUBMISSION TO WESTCONNEX M4/M5 LINK EIS.

Dear Sir/Madam,

We are submitting objections and strong concerns for parts of the M4/M5 link particularly in relation to the Rozelle Bay precinct and the impacts during operation and construction.

We urge the Secretary of Planning to advise the Minister to require the EIS to be reviewed and impacts set out below to be adequately addressed and mitigated in the EIS.
Our main concerns during operation are:

1) Increased air pollution and the reduction in air quality. While the EIS states that modelling demonstrates the air quality to be within various limits, it also states that ultrafine particles are not independently included in the study and that these can be linked to serious health affects, as indicated the World Health Organisation in 2012 discussing the carcinogenic impacts of diesel particulates.

Mitigation of this concern should be addressed through the design to include the strictest standards. The RMS Options for Treating Road Emissions TPO8, July 2014, states that the Euro5/6 standards for new passenger vehicles would reduce emission of PM by 131 tonnes annually at a cost of $209,000 per tonne, with a health benefit of $280,000 per tonne.

,
We would suggest the EIS air quality cumulative impacts needs to include the high levels of pollution being pumped into the Whites Bay precinct - being extremely close to the Rozelle Interchange, from visiting ocean liners/cruise ships who continue to burn fuel while in port as they do not have access to local power.
While the project team may not be able to address policy changes to passenger vehicles or local power

provision.

We strongly suggest the government has a responsibility to design policies that provide holistic mitigation measures for the wider area. Particularly where negative impacts are cumulative and interconnected.

We suggest air quality facts and mitigation needs to be far more clearly communicated and experts need to be available at consultation days to negate community outrage and concern around this issue.

2) Removal of park and trees at Buruwan Park. We strongly object to the removal of this park and the large trees around this park and Light Rail Bay stop. The vegetation appears to provide some mitigation from traffic noise, and maintains the green corridor around the light rail providing strong visual and recreational amenity. The path through the park is a connecting cycle way from Annandale to the ANZAC Bridge. We request that large trees be kept or transplanted in this space and green walls be planted at all available opportunities.

We would also like consideration and inclusion of bike and pedestrian pathways from the underpass off Railway Parade to the Cresent, currently available through Buruwan Park.

3) We are extremely concerned with the increased noise pollution from the Rozelle Interchange intersection and the lack of sufficient noise mitigation. There would appear to be huge potential to create robust and visually pleasing noise mitigation barriers. We would like higher noise walls than the current Western Distributor wall, and for it to be extended to run parallel with the light rail line towards Johnson Street. Stopping at the heritage mural or this being included. Due to the increased road mass and heat from these. We would like all noise walls to be planted as a green walls and where possible current trees to be maintained or relocated near by.

4) Traffic flow at the Rozelle interchange - need for better management of traffic and further design options designed with the community. We would question why the entrance and exit to the Western Harbour Tunnels are above ground. It would seem an enormous potential traffic burden and congestion issue if these tunnels drain on to the surface roads (City West Link) for traffic going on to and off the Anzac Bridge. And underground option would seem a lot more sensible from a traffic flow perspective and for keeping traffic off the surface - where it will need to travel through at least one major intersection. This intersection - where The Crescent and the Harbour Tunnel Link meet has significant potential problems for the local community and users of the road. We would like options for this area to be discussed with the local community and incorporated into managing air quality, increased vegetation and trees in this area.

We would also question why the entrance and exit to the southbound link need to be on the surface as well, why isn't that a sub-surface road too? It would seem to be dumping a lot more traffic on to the eastern end of the City West Link as well. It seems incongruous that northbound traffic has an easy underground run to the Iron Cove link and WHTBL, but needs to run through traffic lights and surface roads to get to the Anzac Bridge. The impacts of this on local residents is increased noise particularly as current noise mitigation around this area appears minimal.

5) The EIS shows that traffic on the City West Link, Johnston St, the Crescent, Catherine St and Ross street would greatly increase particularly if Stage 3 is completed. The EIS states it would do nothing to improve traffic congestion in the area, and may in fact add to the problem. Many Annandale streets are congested at peak times, particularly the Crescent which is the main road tho the newly opened Tramsheds. The EIS recognises that this would have a negative impact on the local area as more and more people try to avoid the congestion by using rat runs through local streets. We suggest that traffic flows and the intersection around the Light Rail underpass will be far more congested and needs better traffic lights. There is currently a blackspot just behind the underpass, a small road allows cars to make a righthand turn from Johnston street onto the Crescent. This is a dangerous turn as visibility around the corner is minimal, with increased traffic and large truck movements this turn would be impossible to make.

Our main concerns during construction:

1. The EIS shows that traffic on the City West Link, Johnston St, the Crescent, Catherine St and Ross street would greatly increase during the construction period . We would like the traffic lights and the right hand turn form Johnson Street into the Crescent to be improved.
2. We are concerned about noise from construction movements at the C5 and C6 sites and traffic around the Cresent, Johnston Street intersection. We would like noise barriers and permanent noise walls to be implemented early in the project at this area.

I urge the Secretary of NSW Planning to advise the Minister to reject this EIS, and publish my name and submission in accordance with the undertaking on your website, and provide a written response to each of the objections I have raised.

IP Address: [redacted]
Submission: Online Submission from [redacted] (comments)
https://majorprojects.accelo.com/?action=view_activity&id=228377

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent: Mon, 16 Oct 2017 12:46:16 +0000
To: [redacted]
Subject: FW: Submission Details for Sanjay Kumar (comments)

From: system@accelo.comOn Behalf OfSanjay Kumar
Sent: Monday, 16 October 2017 11:46:06 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Sanjay Kumar (comments)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Sanjay Kumar
[redacted]

Address:
[redacted]

Annandale, NSW
2038

Content:
My wife and I bought a terrace on Pyrmont Bridge Road, Annandale in August. This is our first home purchased together and the house where we hoped to start our family.

Since buying the house, the plans for the C9 Pyrmont Bridge Road tunnel site have been made public. The north-eastern boundary of the site is within 40 metres of our property.

While our property (and indeed, much of the area bounded by Mallet/Booth St, Parramatta Road and Johnston's Creek) is zoned light industrial, it enjoys existing use rights under the Environmental Planning and Assessment Act permitting ongoing residential occupation. We understand those terraces adjacent and immediately opposite are in a similar situation.

In addition, there are numerous residential dwellings, including several large apartment complexes, within metres 100 metres of the site.

We raise these points, as we believe the project will directly and significantly disrupt our family's well-being, and that of our neighbours.

We note below the most significant disruption residents near C9 will experience according to the EIS:

- On page 6-96, Table 6-27 shows C9 will be used to for spoil haulage, an activity which is allowed to occur 24 hours a day, seven days a week.
- On page 6-83, Table 6-22 shows there will be 133 heavy vehicles a day at the site.
- On page 9-45, Table 9-16 outlines "risk categorisation of construction scenario for each type of activity," showing every category (demolition, earthworks, construction, track-out) all classified as "large."
- On page 9-47, Table 9-18 "Results of sensitivity to dust soiling effects," shows both the receptor sensitivity and sensitivity of area are categorized as "high."

- On page 9-51, Table 9-23 shows there is "large" potential for dust emissions for all activities (demolition, earthworks, construction, track-out), with "high" sensitivity to dust soiling, "high" risks of dust impacts, and "medium" and "high" risks to human health.
- On page 10-116, Figure 10-19 shows the "highly noise affected buildings," many of which are neighbouring residential dwellings.
- On page 13-18, table 13-5 specifically says the overall visual impact rating for residents on Pyrmont Bridge Road is "high-moderate."
- On Page 14-32 the EIS outlines potential health risks due to dust, stating: "Dust generation from construction activities was raised as a concern due to the potential impacts on the health of some sections of the community who may be more sensitive to changes in air quality. This includes people with pre-existing medical conditions such as asthma or respiratory difficulties, as well as children and the elderly. These impacts are likely to be relevant for works at the Pyrmont Bridge Road tunnel site (C9) in particular, where a number of educational receivers are located nearby, which may be affected by reduced amenity."
- Starting on page 25-5, Table 25-2 shows that every dangerous good and hazardous substance used on Westconnex will be used or transported via the C9 site.

The above points are only a portion of disruption C9 will bring to the neighbourhood, and do not address earth vibration, water contamination risks, or light pollution. The EIS suggests that adjacent residents to C9 will bear the most intrusive and harmful impacts of any construction site used in WestConnex Stage 3.

Having read and interpreted the EIS to the best of our ability, we believe the C9 tunnel site will have a significant detrimental impact on the quality of life for the thousands of people who live nearby.

We note that;

1. At no time since our purchase of our property, nor since the release of the EIS, have we been directly consulted or invited to provide input to this stage of the process;

2. We are not experts in the interpretation of planning proposals and impact statements, and feel that neither the proposal, nor the impacts have been adequately explained to those likely to bear the greatest impact of the C9 site; and

3. From our understanding, there has been no, or insufficient assurances offered by the proponent that the impacts outlined above will be appropriately mitigated, managed or otherwise accounted for so as to avoid significant and ongoing impacts on our health, well-being and quality of life.

We ask that these points be directly considered and accounted for by the applicant prior to the proposal progressing.

Yours sincerely
Sanjay Kumar

[redacted]
Submission: Online Submission from Sanjay Kumar (comments)
https://majorprojects.accelo.com/?action=view_activity&id=228383

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

I submit my strongest objections to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.

Name: James Adamovych

Signature: James Adamovych

Please include my personal information when publishing this submission to your website
Declaration: I HAVE NOT made any reportable political donations in the last 2 years.

Address: 49 Crown Street,

Suburb: St. Peters NSW Postcode 2044

Submission to:

Planning Services,
Department of Planning and Environment
GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name:
WestConnex M4-M5 Link

1. **The EIS admits that impacts of construction of the M4-M5 Link will worsen traffic on Parramatta Rd. In these circumstances it is outrageous for motorists to be asked already to pay up to up to $20 a day in tolls. I object to the fact that this is not considered or factored into the traffic analysis.**

2. **I object to this new tollway because in the past tolls have been justified as needed to pay for the new road. This is not the case of this tollway that will charge tolls for 40 years. This is only to guarantee revenue to the new private owner.**

3. **There has never been any proper assessment of the cumulative impacts on heritage of the WestCONnex project. The loss of heritage in Concord, Haberfield and St Peters has been on a large scale and now the Stage 3 EIS shows that the M$/M5 tunnel would further add to this loss.**

4. **The basic question that the people of NSW need answered by the EIS is For the same or lower cost of the project, could we do something that is different to the project that will deliver outcomes that are as good or better? The Secretary's Environmental Assessment Requirements (SEARS) require analysis of feasible alternatives to the project. No feasible alternatives have been developed and no objective analysis of alternatives has been undertaken. While Section 4.4 of the EIS purports to cover Strategic Alternatives, it does little more than offer a discussion of why an alternative was not pursued.**

5. **I specifically object to the removal of the lighting tower and the Port Authority Building. These items are of considerable local significance and are representative of the operation of the Rozelle Rail Yards in the first part of the 20th century. I do not agree with trashing industrial history when it could be put to good community use.**

6. **The EIS misrepresents the structure of the Global Economic Corridor and overstates the relationship of the project to centres within it by claiming the Project serves centres in the north of the GEC that it does not.**

7. **The cited 'key customers' that would benefit from the project (long distance, freight, businesses) represent a very small minority of those who are forecast to actually use the project (single occupancy commuter vehicles). The key customers could be served by a far more modest project, given they represent an extremely small proportion of projected traffic on the Project.**

From: [redacted]
Sent: Mon, 16 Oct 2017 12:57:21 +0000
To: [redacted]
Subject: FW: Submission Details for Heidi Leung (object)

From: system@accelo.comOn Behalf OfHeidi Leung
Sent: Monday, 16 October 2017 9:54:05 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Heidi Leung (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Heidi Leung
[redacted]

Address:
[redacted]

Five Dock, NSW
2046

Content:
Myself and my family are not happy with the Westconnex's plans (especially the Option B Plan) for a construction site less than 200m from Haberfield Public School. This will have significant adverse impacts on our children's health, safety and learning. It will significant increase the traffic with the light and heavy vehichles associated with Option B. This will then create real and great safety risks for the school children and their parents in travelling to and from the school during school drop-off and pick up times. If accidents happen because of the Option B, who will take the responsibilities? This is totally unacceptable to risk any people's life especially in relations to the young children.

[redacted]
Submission: Online Submission from Heidi Leung (object)
https://majorprojects.accelo.com/?action=view_activity&id=228335

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent: Mon, 16 Oct 2017 13:11:18 +0000
To: [redacted]
Subject: FW: Submission Details for company BIKESydney (org_object)
Attachments: 228399_2017-10-16_ BIKESydney's Submission to M4-M5 Link EIS_2017Oct16_2359.pdf

From: system@accelo.comOn Behalf OfDavid Borella
Sent: Tuesday, 17 October 2017 12:01:18 AM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for company BIKESydney (org_object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: David Borella
Organisation: BIKESydney (President)
Govt. Agency: No
[redacted]

Address:
[redacted]

Camperdown, NSW
2050

Content:
Our submission is in pdf form attached

[redacted]
Submission: Online Submission from company BIKESydney (org_object)
https://majorprojects.accelo.com/?action=view_activity&id=228399

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

PO Box M59 | Missenden Rd | Camperdown NSW 2050
www.bikesydney.org | ABN 95939852367
Tel +61 2 8213 2437

To:
Department of Planning & Environment

16 October 2017

BIKESydney's submission to
Westconnex M4-M5 Link (SSI 16_7485)

Introduction

BIKESydney is an incorporated not-for-profit community organisation.

We want to live in a city:

- Where riding a bicycle is part of everyday life
- That is vibrant, healthy, productive, creative and robust
- That values community, mobility, health, wellbeing social equity and sustainability
- Where people of all ages can make easy choices to ride a bicycle, walk and take public transport.

We advocate on behalf of our members and people who ride bicycles who live and work in central Sydney.

To those reading who have the position to make change
for positive community benefit,
don't hide.

BIKESydney has engaged agencies - including the Sydney Motorway Corporation and Transport for NSW - directly in relation to the M4-M5 Link's (The Project's) obligations to provide for Active Transport. We ask that the Department of Planning & Environment (DPE) engage with those agencies directly in relation to BIKESydney's requirements of the Project. The process of engaging projects through the EIS process is antiquated and irrelevant in all but one aspect: to have the project conditioned.



The Project must be Conditioned in at least the following ways:

- The Project must deliver an Active Transport Network that extends for the full extent of the Project corridor. This is consistent with the Government's "positive provisioning" requirements. We have provided Transport for NSW our draft network concept;

- Notwithstanding the above, elements of the Active Transport Network (ATN) indicated in the EIS as being delivered by "others" are to be fully funded by the Project. It is unconscionable that a project of this scale and which absorbs so much of the public fund will not furnish an active transport network;

- The Project MUST deliver (and not delegate delivery of) the **City West Cycle Link** (refer: http://citywestcyclelink.org.au/concept) . This is the most significant, game-changing cycling infrastructure in central Sydney, even moreso than the Sydney Harbour Bridge Cycleway

northern extension (which anyway will only land riders as far north as, and at-grade with, Lavender St such that they are again subject to the RMS road network and its controls). The City West Cycle Link will link the inner west to the CBD via a flat, off-road green cycleway and thus will truly enable riders of all ages (8 to 80 years) who are presently excluded by the RMS' current network design practices. The City West Cycle Link will legitimise the business case for The Greenway (currently in Master Planning) and partly also the re-opening of the Glebe Island Bridge (currently being investigated). Once this vital link is created, there will exist a walkable and cycleable "Green Grid" corridor from Strathfield to the CBD. This is the game-changer for cycling in Sydney. Given planning permissions, civil works, land ownership issues, the City West Cycle Link can only be delivered by NSW Government, and by extension, the Project. Councils will not be able to manage these state issues. The Project can deliver the City West Cycle LInk easily, particularly given the Project's nearby construction site (Darley Rd) from which excavation plant could very easily reach the relevant corridor;

- The Project MUST deliver a pair of uni-directional (not the typical bi-directional, single-channel) separated cycleways on each side of Victoria Road for its full length between the Iron Cove Bridge and the City West Link. These cycleways will anyway play a critical role in truly protecting against future "traffic creep" within the corridor if lanes are not resumed from motorised traffic. (introducing only car-parking lanes isn't a sufficient protection against this, as the RMS will merely resume these lanes in future as has happened on Victoria Rd further west. This has killed local commerce and liveability outcomes in those areas). It is to be noted that the Project claims substantial reductions in surface traffic as part of its justification. The gains need to be secured by meaningful "road diets" and local traffic calming;

- The Project must deliver and/or fully fund a separated cycleway for the full length of both Johnston St, Annandale and Northumberland Ave, Stanmore, with full cycling treatments through all intersections, including the Parramatta Road intersection. This will enable riders to safely traverse these significant existing cycling barriers;

- The Project MUST deliver of fully fund the Whites Creek cycleway, extending as far south to, and connecting into Phillip St, Petersham;

- The Project must provide a **detailed** design of its entire Active Transport Network (ATN). The ATN presented in EIS is sketchy and incomplete; at times, incoherent;

- The Project must deliver or fully fund a viable separated cycleway connecting Lilyfield to Sydney University (50,000 students and 7,500 staff) to the approved (but not yet built) Wilson St Cycleway;

- The Project should construct or fund an Active Transport crossing of the Central to Eveleigh rail corridor (as has long been touted by the Central to Eveleigh Urban Transformation Plan);

Please feel free to contact us should you require any clarification or wish to discuss other matters.

Yours sincerely
David Borella
BIKESydney
President
david.borella@bikesydney.org

From: [redacted]
Sent:
To:
Subject: FW: Submission Details
Attachments: 228397_westconnex_2017Oct16_2357.pdf

From: system@accelo.comOn Behalf Of [redacted]
Sent: Monday, 16 October 2017 11:58:11 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Name: [redacted]
Email:

Address:
[redacted]

[redacted]

Content:
I oppose the project due to its impacts on the environment, land use, public transport alternatives and cost. Details are provided in the attachment.

IP Address: [redacted]
Submission: Online Submission from [redacted](object)
https://majorprojects.accelo.com/?action=view_activity&id=228397

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

Alternative options to the Project

Existing road network.

Section 4.4.1 acknowledges that the Anzac Bridge is one of the most congested sections of the Sydney road network, while doing little to reduce demand for traffic towards the Sydney CBD.

As this acts as a significant constraint towards increasing further increases in capacity to the CBD, combined with severely limited road space within the CBD itself, the claimed benefits to travel time towards the CBD are unlikely to materialise.

Public transport.

While it is acknowledged public transport for passengers does not directly serve road freight or goods vehicles, these alternatives are likely to be similarly effective in mitigating road demand, compared to the Project.

The assertion that "public transport alone cannot viably serve most of these locations [across the Sydney metropolitan area]" is unsubstantiated, especially in light of the high demand for public transport acknowledged in the report. This is especially prevalent within the corridor of the Project, with many bus routes and train lines overcrowded.

Some of the most heavily patronised bus routes in Sydney (and indeed Australia) are cross-regional routes, such as routes 400, 370 and M41. Ironically, this is so despite demand demand being suppressed by slow travel times, with these routes being amongst the most unreliable in the city. Public transport initiatives to improve travel times along these corridors would reduce travel times considerably and encourage greater use of higher capacity public transport alternatives.

Concerns about inadequate demand for cross-regional links are likely to not hold water, especially as demand predictinos are likely based on current, slow, infrequent buses. If these were frequent and fast, such links along major corridors would increase demand for public transport by making it viable for the majority of trips being done, reducing car dependency. This does *not* require a link to "everywhere", but critical missing links prevent people from travelling in a more intuitive, direct fashion that reduces overall travel times.

Section 4.4.2 also notes that "even under the most ambitious scenarios for land use change and growth in public transport, the absolute number of car journeys will continue to increase." While this is not wrong per se, this is not a comparative statement given that the number of car journeys would be significantly higher if the Project is approved compared to the "do minimum" case or public transport alternatives.

While "public transport initiatives would only partially contribute to relieving congestion on arterial roads", previous motorway projects in Sydney and abroad have also consistently failed to provide the estimated travel time benefits and congestion relief predicted in their business cases. An example of this is the M2 road upgrade (completed in 2015), where rather than improving travel times, buses were instead five minutes slower following the upgrade.

Furthermore, unlike other road tunnel projects in Sydney, the Project provides little to no opportunity for modification to surface roads for dedicated bus lanes. Because of this, it is unable to provide measurable benefits for higher capacity public transport options, nor could it replace the need for a future underground railway line in the broader area surrounding the Project.

As such, supply side management of transport mobility is limited in its effectiveness to reduce travel times by road, due to the negative externality of vehicles having a significant impact on other road users. The majority of demand for increased road capacity would be used by private motor vehicles, with these sorts of

activities providing limited value to the economy while slowing down important road users like freight, goods and trade vehicles.

Demand management.

The support for demand management techniques is noted and concurred with.

However, as explained above, the point that demand management is insufficient on its own does not constitute justification to build the Project, especially in like of superior alternatives like investment in more public transportation. Increases in rail freight capacity and reductions in rail freight handling times are also critical, as the intermodal penalty is often partly why road freight is currently more popular.

Options of constructing the Project

The proposed interchange at Rozelle is likely to face significant challenges in its construction and feasibility, which has both impacts to the environment in terms of impacts to the water table, soil and nearby waterways, as well as increasing the cost of construction of the project. This would have a severe impact upon the benefit-cost ratio of the project, calling into question whether the project delivers more benefits than costs on a social basis. It would also result in a reduction of value to surrounding homes, given increased noise levels, air pollution and reduced urban amenity in the areas surrounding the Project.

It would also give up an opportunity to use the area for potential future inner city housing projects and as a potential public transport interchange hub, meaning this Project would forgo the notable land use, productivity and environmental benefits that such an alternative would provide.

Notwithstanding the presence of some residual land, the nature of the tunnel construction and associated engineering issues, as well as air quality and noise issues, means that the area is unlikely to be well-connected as a single area or be suitable for further development of housing or public transport options like light rail.

It is crucial that these effects are modelled accurately and considered in detail when assessing its impact of the Project on other stakeholders. Especially given these severe impacts, I oppose the Project and believe its impacts outweighs its benefits. This Project shall not be approved, and certainly not in its current state.

From: [redacted]
Sent:
To:
Subject: FW: Submission Details
Attachments: 228205_M4-M5 Link EIS Response_2017Oct16_1650.pdf

From: system@accelo.comOn Behalf Of [redacted]
Sent: Monday, 16 October 2017 4:51:12 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Name: [redacted]
Email: [redacted]

Address:
[redacted]

[redacted]

Content:
We strongly object to the WestConnex M4-M5 Link EIS.

Before we get started we note that Westconnex rejected our pre-EIS submission because it was sent after 5 pm. This was despite advertising a closing date for submissions without a closing time.

Please see the attached pdf for our full submission including images.

Given the misleading and deceptive nature of material published by the proponent in its community consultations it is clear they are not a fit and proper organisation to be granted planning approval. We have been extremely misled regarding how many stacks will be located near our homes. It is unacceptable for the proponent to publish misleading information to the community given that community consultation is a requirement of approval.

The consultation process and supporting material used by the proponent to promote the application to the community were deeply flawed and has been misleading and deceptive in terms of providing false information about the number of pollution stacks really planned for the Rozelle interchange. Sydney Motorway Corporation (SMC) has published numerous maps that clearly show only a single ventilation outlet in the Rozelle Rail Yards. Leading citizens to believe there will only be a single ventilation when there are really 3 ventilation outlets planned to serve 3 different tunnels is clearly false and misleading in a material particular.
Given that is a company set up under the Corporations Act we believe the misleading information distributed by the proponent constitutes misleading and deceptive conduct under Australian Consumer Law section 18.

Further we believe the misleading information also breaches the following section of the Environmental

Planning and Assessment Act 1979 and perhaps additional sections:

148B Offence--false or misleading information (1) A person must not provide information in connection with a planning matter that the person knows, or ought reasonably to know, is false or misleading in a material particular.

The proponent relies upon evidence of it's community consultation as part of the requirements for planning approval hence the materials it uses as part of it's community consultation form part of the information provided in connection with a planning matter.

The latest example of a misleading map we have seen being used by the proponent which is materially misleading is in their "Community Guide to the M4-M5 Link Environmental Impact Statement" as below:

The map clearly shows only a single ventilation outlet for Rozelle Rail Yards and is also labelled singularly as "Rozelle ventilation outlet". This is a deception of the highest order and although the laws breached by this false information does not require intent from the proponent to mislead their is no escaping the likelihood that this has been a deliberate effort to deceive to minimise community opposition to the Rozelle interchange.

The "Community Guide to the M4-M5 Link Environmental Impact Statement" further misleads readers:

By far, the biggest source of human-made PM2.5 is home heating, such as open-fire-places. This constitutes 50.6 per cent of all human-made PM2.5 in Sydney. By contrast, petrol-powered vehicles are a relatively minor source at only 0.75% (see Figure 3.5).

This misleads readers into believing that vehicles using the tunnels are a very minor source of PM2.5 when only if you read the detail in the figure the real figures are far higher when actual vehicle usage of the tunnel is taken into account:
0.75% - Petrol powered cars
2.2% - Light duty diesel - exhaust
5.3% - Heavy duty commercial diesel - exhaust
5.5% - All vehicles Non-exhaust particulate matter
TOTAL: 13.75% vs. the extremely misleading statement of only 0.75%.

Additionally we object to the proposal for the following additional reasons:

As per the email at the end of this document, a significant portion of the EIS (chapters 9-15 including the air quality assessment in the large file section) was withheld from the Planning NSW website until rectified 25 September. It is unacceptable for a $7 billion dollar assessment with such significant impacts to withhold such a significant portion of the EIS whether intentional or not. We were never aware the missing sections were in the small file folder and regardless it is very difficult for us and the average person to download, manage and read what looks like a hundred files. The community should be given more time to respond to the EIS given the failure to properly make available the entire EIS.
The human health risk assessment in the EIS appears to be based on ambient air quality and does not take into account the significant buildup of pollutants that would occur in real world conditions with carcinogenic pollution entering and building up inside homes. We do not agree with the EIS that the shortening of lives of citizens caused by this project are tolerable/acceptable
The proposal unfairly burdens Rozelle in particular with 4 stacks with 3 in extremely close proximity. Depending on wind this may result in plume impact with homes from 3 tunnels simultaneously.
The solution as proposed is not best practice and does not minimise impact to the community in a meaningful way. It is unacceptable for residents to be affected by direct plume impacts from smokestacks and the location and height of the Rozelle interchange stacks appears to not prevent plume ground impact occurring.
Claims of maintaining ambient air quality do not take into account real world local air quality issues. It does not take into account existing pollution hot spots that affect some streets and does not take into

account pollution entering and pollution build up in homes and offices that can be expected to build up to dangerous levels.
Balmain and Rozelle are already heavily burdened by cruise ship pollution and vehicle pollution from roads such as Victoria Rd and the Western Distributor.
The location and configuration of the smoke stacks for Rozelle Rail Yards is an extremely poor choice:
They are located in a valley only a few meters above sea level.
The top of the stack is below the height of nearby residences resulting in them being bathed in carcinogenic pollutants.
The location of the stacks under the Sydney Airport flight path places constraints on the height of the stacks and the velocity of air being ejected from the stacks further reducing their ability to disperse pollutants.

IP Address: - [redacted]
Submission: Online Submission from [redacted](object)
https://majorprojects.accelo.com/?action=view_activity&id=228205

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

Summary

We **strongly object** to the WestConnex M4-M5 Link EIS.

Given the misleading and deceptive nature of material published by the proponent in its community consultations it is clear they are not a fit and proper organisation to be granted planning approval. We have been extremely misled regarding how many stacks will be located near our homes. It is unacceptable for the proponent to publish misleading information to the community given that community consultation is a requirement of approval.

The consultation process and supporting material used by the proponent to promote the application to the community were deeply flawed and has been misleading and deceptive in terms of providing false information about the number of pollution stacks really planned for the Rozelle interchange. Sydney Motorway Corporation (SMC) has published numerous maps that clearly show only a single ventilation outlet in the Rozelle Rail Yards. Leading citizens to believe there will only be a single ventilation when there are really 3 ventilation outlets planned to serve 3 different tunnels is clearly false and misleading in a material particular.

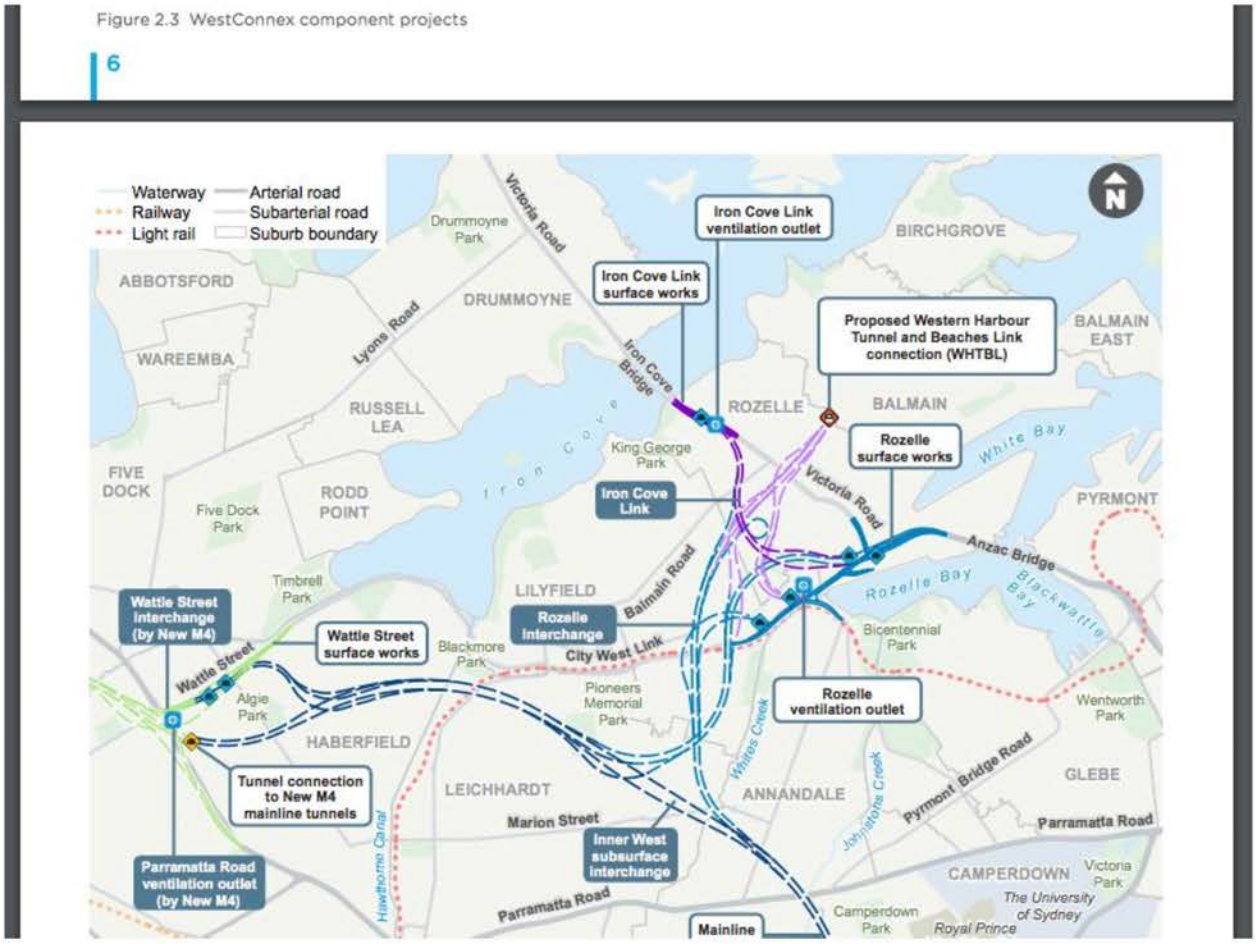
Given that is a company set up under the Corporations Act we believe the misleading information distributed by the proponent constitutes misleading and deceptive conduct under Australian Consumer Law section 18.

Further we believe the misleading information also breaches the following section of the Environmental Planning and Assessment Act 1979 and perhaps additional sections:

148B Offence--false or misleading information *(1) A person must not provide information in connection with a planning matter that the person knows, or ought reasonably to know, is false or misleading in a material particular.*

The proponent relies upon evidence of it's community consultation as part of the requirements for planning approval hence the materials it uses as part of it's community consultation form part of the information provided in connection with a planning matter.

The latest example of a misleading map we have seen being used by the proponent which is materially misleading is in their “Community Guide to the M4-M5 Link Environmental Impact Statement” as below:



The map clearly shows only a single ventilation outlet for Rozelle Rail Yards and is also labelled singularly as “Rozelle ventilation outlet”. This is a deception of the highest order and although the laws breached by this false information does not require intent from the proponent to mislead their is no escaping the likelihood that this has been a deliberate effort to deceive to minimise community opposition to the Rozelle interchange.

The “Community Guide to the M4-M5 Link Environmental Impact Statement” further misleads readers:

By far, the biggest source of human-made PM2.5 is home heating, such as open-fire-places. This constitutes 50.6 per cent of all human-made PM2.5 in Sydney. By

contrast, petrol-powered vehicles are a relatively minor source at only 0.75% (see Figure 3.5).

This misleads readers into believing that vehicles using the tunnels are a very minor source of PM2.5 when only if you read the detail in the figure the real figures are far higher when actual vehicle usage of the tunnel is taken into account:

- 0.75% - Petrol powered cars
- 2.2% - Light duty diesel - exhaust
- 5.3% - Heavy duty commercial diesel - exhaust
- 5.5% - All vehicles Non-exhaust particulate matter
- TOTAL: 13.75% vs. the extremely misleading statement of only 0.75%.

This is just another example of the proponent attempting to distort information and leave a lasting false impression on the community to minimise opposition to the project.

Additionally we object to the proposal for the following additional reasons:

- As per the email at the end of this document, a significant portion of the EIS (chapters 9-15 including the air quality assessment in the large file section) was withheld from the Planning NSW website until rectified 25 September. It is unacceptable for a $7 billion dollar assessment with such significant impacts to withhold such a significant portion of the EIS whether intentional or not. We were never aware the missing sections were in the small file folder and regardless it is very difficult for us and the average person to download, manage and read what looks like a hundred files. The community should be given more time to respond to the EIS given the failure to properly make available the entire EIS.
- The human health risk assessment in the EIS appears to be based on ambient air quality and does not take into account the significant buildup of pollutants that would occur in real world conditions with carcinogenic pollution entering and building up inside homes. We do not agree with the EIS that the shortening of lives of citizens caused by this project are tolerable/acceptable
- The proposal unfairly burdens Rozelle in particular with 4 stacks with 3 in extremely close proximity. Depending on wind this may result in plume impact with homes from 3 tunnels simultaneously.
- The solution as proposed is not best practice and does not minimise impact to the community in a meaningful way. It is unacceptable for residents to be affected by direct plume impacts from smokestacks and the location and height of the Rozelle interchange stacks appears to not prevent plume ground impact occurring.

- Claims of maintaining ambient air quality do not take into account real world local air quality issues. It does not take into account existing pollution hot spots that affect some streets and does not take into account pollution entering and pollution build up in homes and offices that can be expected to build up to dangerous levels.
- Balmain and Rozelle are already heavily burdened by cruise ship pollution and vehicle pollution from roads such as Victoria Rd and the Western Distributor.
- The location and configuration of the smoke stacks for Rozelle Rail Yards is an extremely poor choice:
    - They are located in a valley only a few meters above sea level.
    - The top of the stack is below the height of nearby residences resulting in them being bathed in carcinogenic pollutants.
    - The location of the stacks under the Sydney Airport flight path places constraints on the height of the stacks and the velocity of air being ejected from the stacks further reducing their ability to disperse pollutants.

Community update maps are misleading and deceptive.

We received one letterbox newsletter re WestConnex from SMC.

It shows a map with a single ‘fan’ icon on Victoria Rd and a single ‘fan’ icon in Rozelle Rail yards. Reasonable interpretation was 2 stacks total.

Not until inspecting plans in large pdf do you become aware there are actually 3 separate stacks in Rozelle Rail Yards.

This is incredibly misleading and deceptive and is likely done to minimise community awareness of the true scale and number of stacks proposed for Rozelle.

We received more information about WestConnex from Leichhardt Council and community groups.



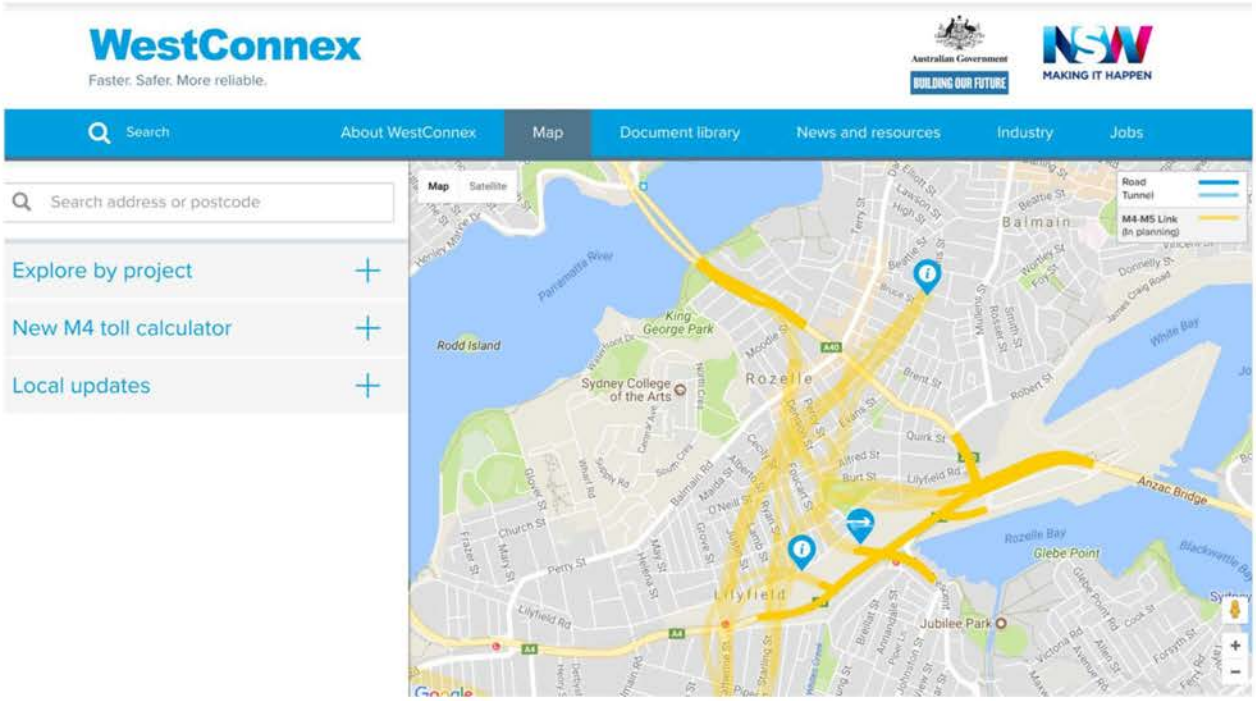
Online maps hide locations of ventilation stacks by default.

When viewing online maps (https://www.westconnex.com.au/map) SMC hides locations of ventilation stacks by default.

SMC knows ventilation stacks are controversial and locations are likely the largest concern for the community.

Only be navigating to ‘Explore by project’ and selecting to show ventilation facilities can you see their location.

Turning off the display of stacks by default is likely an intentional effort to minimise community awareness of the stacks.



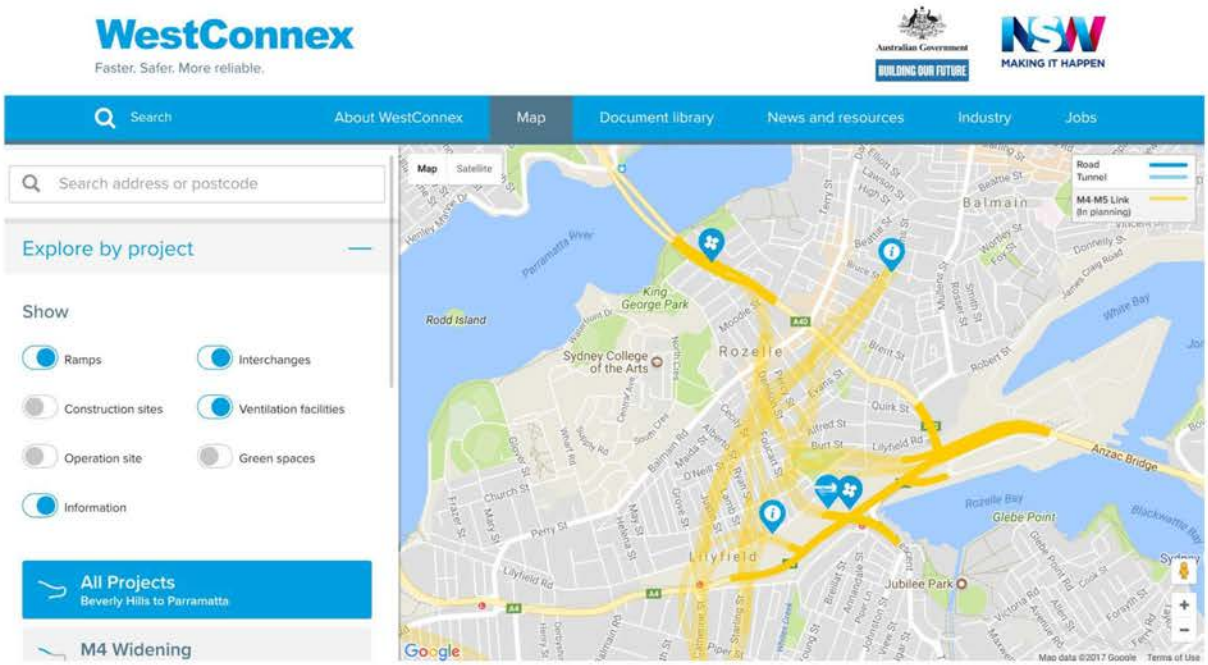
Online Maps are Misleading and Deceptive - do not show number of stacks in Rozelle Rail Yards

Again, by showing only a single 'fan' icon in Rozelle Rail Yards SMC creates the impression there is only a single smoke stack in Rozelle Rail Yards.

This can only be considered misleading and deceptive behaviour.

Not until inspecting plans in large pdf do you become aware there are actually 3 separate stacks in Rozelle Rail Yards.

This is incredibly misleading and deceptive to the community.


WestConnex
Faster. Safer. More reliable.
Australian Government
BUILDING OUR FUTURE
NSW
MAKING IT HAPPEN
Search
About WestConnex
Map
Document library
News and resources
Industry
Jobs
Search address or postcode
Explore by project
Show
Ramps
Interchanges
Construction sites
Ventilation facilities
Operation site
Green spaces
Information
All Projects
Beverly Hills to Parramatta
M4 Widening
Map
Satellite
Road Tunnel
M4-M5 Link (In planning)
Balmain
Rozelle
Lilyfield
Jubilee Park
Glebe Point
Rozelle Bay
Anzac Bridge
King George Park
Rodd Island
Sydney College of the Arts
Google
Map data ©2017 Google
Terms of Use

Community Update May 2017 Fails to Bring Any Attention to the Community Regarding 3 Stacks

This update has numerous artists impressions yet none appear to show any ventilation stacks.



Surely SMC has an obligation to fairly detail both aspects of the project that would be considered positive and negative for the community. Failing to do so is misleading and deceptive.

Especially given that an image of the 3 proposed stacks would have increased community awareness of the fact given the maps do not.

Map Errors and Lack of Information / Response From Westconnex Phone Call

On 12 May I checked the WestConnex.com.au map and turned on the option to view ventilation facilities. Only an icon was displayed in the Iron Cove location. There was no icon displayed at Rozelle Rail Yards.

Further, prior to purchasing a property I phoned Westconnex to ask questions about the proposed development. I was told there was not anyone available to answer my questions and that I would receive a call back.

I am not aware of any return call ever being made.

Height of Stacks

I understand stacks are proposed to be around 35 meters high. This seems very low given that Darling St Rozelle is over 40 meters above sea level.

The nearby White Bay power facilities stacks appear to be higher.

Given the Rozelle Rail Yard stacks are on ground that is close to sea level and houses and buildings nearby rise up to around 40 meters at Darling St it appears inescapable that the smoke plumes would impact the ground and houses.

Plume dispersion for higher stacks would clearly reduce direct plume impact issues. However it appears that with the location of the Rozelle Interchange stacks under the Sydney International Airport flight path that their are constraints both on the height of the stacks and also the velocity of air being expelled from the stacks further. It also appears the approach of the proponent / government is to only have stacks as high as needed to meet ‘project goals’ and that the visual appearance / impact of stacks is more important than making them more effective.

The smokestacks appear too low to emit the carcinogenic pollution within or above inversions resulting in a plume that will pollute the areas near the smokestacks.

Given the experiences of Balmain residences affected by plume impact from cruise ships and the controversy and expert opinion of the magnitude of the mistakes made by government in relocating cruise ships to White Bay it is unbelievable that government has not learned anything.

Appearance of Stacks and Health Warnings

Stacks should not be designed to blend into surroundings.

Stacks should have ample warnings around them regarding the carcinogenic nature of the pollutants they emit.

Smoke Plume Dispersion From Melbourne Road Tunnel



Claims are made by SMC as to the effectiveness of pollution dispersion via elevated stacks however again the ones proposed are really not very high, they are surrounded by rising land with residents located at the height of the stack or higher.

The numerous photos of the melbourne tunnel fire showing pollution dispersion below the height of the stack which raises serious concerns for the community. Direct plume impact with houses will result in a massive buildup of pollutants in people's homes. This is not addressed by the EIS.

Design is not ‘Best Practice’

Numerous claims are made by SMC regarding the concept being ‘best practice’. This appears to be misleading and deceptive.

Unfiltered stacks would not appear to be ‘best practice’. A cluster of 3 stacks in Rozelle Rail Yards does not appear to be best practice and appears to be the only instance on the planet in terms of tunnels where there will be such a concentration of stacks in a single location. Considering the recent leaks of another stack proposed to be very close by for the proposed Western harbour tunnel and it is clear that SMC is pushing boundaries that may have not been attempted anywhere globally.

Arguments are made that filtering is not needed because:

- Filtration is not used in other Australian tunnels. This is no guarantee that not filtering emissions is best practice.
- Standards will be met without filtration. Again this is not an indication of best practice.

The government should dislclose the per car / trip cost of filtering tunnels over 10, 20, 30 years etc. I understand it could be as little as 5c per car per trip and could make a meaningful reduction in volume and quantity of deadly pollution being emitted. To claim that filtering stacks will make little ‘detectable’ difference to ambient air quality is mischievous. Reducing carcinogenic emissions at the source would make a meaningful difference to residents affected by plume impacts with the ground / houses.



Is 3 tunnel pollution stacks in such a concentrated area and so close to residents really best practice? I note you must really zoom in and look closely at diagrams in material published by the proponent to see there are actually 3 ventilation outlets, not just 1 as claimed by the proponent.

The Pollution Emitted from Tunnel Stacks are Carcinogenic and Stacks are highly concentrated point sources of pollution

http://www.news.com.au/national/female-major-sacked-for-adverse-thoughts-and-beliefs-after-saying-she-got-cancer-at-work/news-story/3ef389a835392c0aff8bbb0697bf168b

“Female Major sacked for ‘adverse thoughts and beliefs’ after saying she got cancer at work

She identified up to 15 other cancer cases on her floor at Victoria Barracks in Melbourne — located close to a freeway tunnel exhaust stack.

The EIS should produce the long term evidence and studies it has that stack emissions will not shorten lives of residents living around them.

It is not enough to make claims about ambient air quality using monitoring in limited locations.

Stack Proximity to Residents

There are large discrepancies in the proposed locations of stacks between various maps.

The concept design shows stacks in the Rozelle Rail Yards closer to the Western Distributor than to residents in Rozelle.

The feedback map (https://www.collaborativemap.com/WestConnex) shows the ventilation facility icon (again hiding the fact that it is proposed to have 3 stacks) much closer to residents in Rozelle (on top of Ironwood Australia).

How can there be such a discrepancy!? Further, instead of only showing a single point for the entire ventilation facility it would be much more meaningful for the community to be able to see on the map the proposed location of the 3 individual stacks.

This is again misleading and deceptive and is very likely to leave the impression to many that there is only going to be a single stack.

The entire consultation process should be cancelled and started again due to the above point alone. I note SMC was incorporated under the Corporations Act 2001. These misleading representations and misrepresentations regarding the true nature of the stacks proposed for Rozelle have resulted in citizens making property purchase decisions they would otherwise have not made.

If this horrific project is to go ahead stack locations should be decided by independent health organisations taking into account actual exposure risks for the community over time. I notice concerned comments regarding stacks over playing fields which I agree with however at the same time it is not a reasonable solution to place them off the fields closer to residents as residents would have greater over time exposure then people who are only on the playing fields for a limited time. The stacks must be placed as far away from residents as possible.

What if the EIS is wrong?

What if in 5, 10, 15 years it becomes apparent after all that the unfiltered stacks do cause greater public health impacts than claimed?

Who will compensate those that suffer health issues and families that are emotionally and financially destroyed through premature death?

Who will be held responsible and accountable for any adverse public health impacts?

The project should remain in government hands and the government should retain the ability to put constraints on types and numbers of vehicles able to use the tunnel e.g. restrict use to low emissions vehicles / charge a surcharge for older vehicles.

WestConnex M4-M5 Link + Future Projects Unfairly Burden Rozelle

Taking into account the Western Harbour Tunnel it appears it is proposed to have 4 smoke stacks located within a stone throw of each other in a single area in Rozelle as well as the 5th stack at Victoria Rd Rozelle Iron Cove.

Has this concentration of point tunnel pollution ever been implemented anywhere in the world?

If the projects progress Rozelle as a single suburb would have 5 pollution stacks. This is an unfair and unreasonable burden on a single community.

Ambient Air Quality

It appears that ambient air quality predictions are based sampling and on models that do not take into account or measure pollution entering homes and offices and the buildup of pollutants that would then be expected to occur.

Air quality monitoring must be expanded to include in home monitoring.

I have lived next to neighbours in the past that smoke in their backyard and it is stunning how quickly smoke traveled into our back yard and how long it lingered and how quickly it built up inside if we left doors or windows open.

I don't believe the EIS adequately addresses dispersion and issues related to building effects and downwash. Short of ensuring the stacks are high enough so that ground impact / building effects is not possible this seems beyond the ability of the proponent.

Building effects or downwash: When an air pollution plume flows over nearby buildings or other structures, turbulent eddies are formed in the downwind side of the building. Those eddies cause a plume from a stack source located within about five times the height of a nearby building or structure to be forced down to the ground much sooner than it would if a building or structure were not present. The effect can greatly increase the resulting near-by ground-level pollutant concentrations downstream of the building or structure. If the pollutants in the plume are subject to depletion by contact with the ground (particulates, for example), the concentration increase just downstream of the building or structure will decrease the concentrations further downstream.

Health Professionals Are Concerned and Complain of Being Ignored

http://www.smh.com.au/nsw/doctors-fear-health-impact-of-northconnex-tunnel-pollution-20140829-10a6o0.html

http://www.nswnma.asn.au/health-concerns-over-westconnex/

"HEART disease will skyrocket due to air pollution caused by WestConnex bringing thousands more cars into the inner west, one of Australia's leading respiratory disease experts has warned."
http://www.dailytelegraph.com.au/newslocal/inner-west/health-expert-warns-of-health-risks-associated-with-the-increase-of-traffic-from-westconnex/news-story/61a20f1ddc3235192a5742903e89abab

Air Pollution Standards Used for the Project Do Not Meet WHO Standards

http://www.abc.net.au/news/2015-12-16/national-clean-air-agreement-fails-to-comply-with-who-air-pollu/7033534

http://www.smh.com.au/environment/hopes-fade-of-tougher-air-pollution-standards-at-meeting-of-environment-ministers-20151214-gln8i4.html

Collaborative Map

I wished to add feedback to the collaborative map however at 5:23pm 4th of August further feedback has already been disabled. Why is it not possible to leave further feedback until at least midnight 4th August?

The Government / SMC Are Not Giving Public Health Impacts Enough Consideration

Air pollution-related deaths in Australia have jumped by 69 per cent in five years while deaths in 20 other similar countries have declined, a report from Victoria's Auditor General has said.

http://www.theage.com.au/victoria/alarming-rise-in-deaths-from-air-pollution-20140820-10665r.html

---------- Forwarded message ----------
From: **DPE CSE Information Planning Mailbox** <information@planning.nsw.gov.au>
Date: Mon, Sep 25, 2017 at 11:55 AM
Subject: RE: [SPAM DETECTED BY EXO] Website contact form submission from [redacted] Ref ID: 20170922105517

Dear Ms [redacted]

Thank you for alerting the Department to this matter.

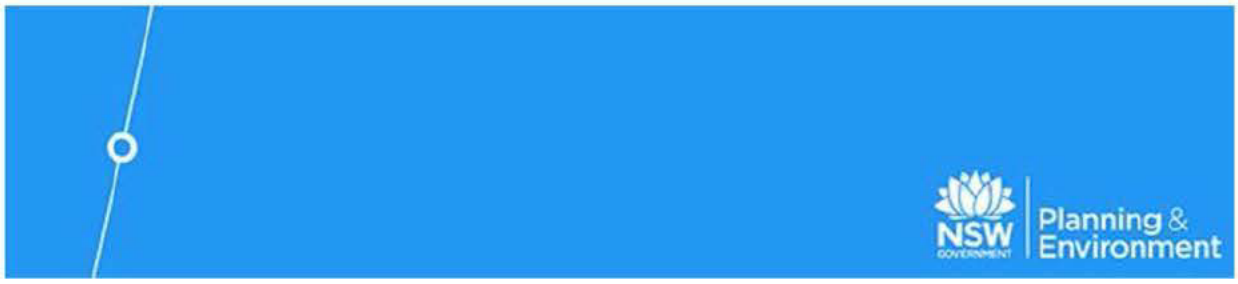
This matter has now been rectified.

Please note that at all times a copy of the EIS volumes were available via the Small File Size folder.

Regards,

[redacted]

From: information@planning.nsw.gov.au [mailto:information@planning.nsw.gov.au]
Sent: Friday, 22 September 2017 11:00 AM
To: DPE CSE Information Planning Mailbox <information@planning.nsw.gov.au>
Subject: [SPAM DETECTED BY EXO] Website contact form submission from [redacted] Ref ID: 20170922105517



An email has been received from the Department of Planning & Environment website's Contact Us online form.
The contact form submission details are below:

Name:

Email address:

Phone number:

Post code:

Type of enquiry: Complaint

Your enquiry is about: Major development proposals

Enquiry details:
In regard to the WestConnex M4-M5 link EIS, under the folder 'Environmental Impact Statement_Large File Size' it appears that a significant portion of the EIS is missing specifically chapters 9 through to 15 which includes air quality. Please immediately make the missing sections available, advise of the reason for withholding these sections and make additional time available to respond to the EIS given the withholding of the information.

Newsletter subscription confirmation: False

From: [redacted]
Sent: Mon, 16 Oct 2017 14:04:33 +0000
To: [redacted]
Subject: FW: Submission Details for Cynthia Moore (object)

From: system@accelo.comOn Behalf OfCynthia Moore
Sent: Monday, 16 October 2017 5:01:12 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Cynthia Moore (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Cynthia Moore
[redacted]

Address:
[redacted]

Haberfield, NSW
2045

Content:
Attention Director
Infrastructure Projects, Planning Services
Department of Planning and Environment
Application number SSI 7485
GPO Box 39 Sydney NSW 2001

I object to this project because it is costing billions of dollars and will make traffice congestion worse on local roads who will be rat running through suburbs to avoid traffic jams and tolls.

None of the three stages goes to Port Botany and this was the original justification as to why Sydney required WestConnex. Why is the M4-M5 link required if it does not fulfill this purpose?

It is false to claim the benefit of improved freight movement will be a result of this project. Section 4.1.14 states that a separate tollway will need to be constructed and this is additional to the M4-M5 Link. Why is the M4-M5 link being built if it does not include a link to Port Botany as part of the original claims for WestConnex.

There is not enough acknowledgement that traffic modelling is an imprecise science. It is likely that any claimed and benefit will not eventuate. Refer to the Lane Cove Tunneland Eastern Distributor as an example.

THe EIS acknowledges that traffic congestion will be a legacy of WestConnex and reports that NSW RMS is already working on more road building works in the future to solve some of the problems created by WestConnex tollways.

Upgrading and extending the passenger train service alternative for Western Sydney that is the preferred

mode of transport for commuters is dismissed with reference to a scoping study to better understand the time and service options for rail investment for Western Sydney. This should have been done before WestConnex was considered. The M4-5 link is an expensive solution for people living in western Sydney who won't be able to afford extra expenses from Tolls ongoing.

Similar to other stages of Westconnex, M4-5 link project will slow down public transport on some corridors. Buses travelling to the CBD will be slower, despite the construction of a tunnel between Iron Cove and Anzac Bridge

[redacted]

Submission: Online Submission from Cynthia Moore (object)
https://majorprojects.accelo.com/?action=view_activity&id=228223

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

From: [redacted]
Sent: Mon, 16 Oct 2017 05:40:14 +0000
To: [redacted]
Subject: FW: Submission Details for Cynthia Moore (object)

From: system@accelo.comOn Behalf OfCynthia Moore
Sent: Monday, 16 October 2017 4:40:01 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Cynthia Moore (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Cynthia Moore
[redacted]

Address:
[redacted]

Haberfield, NSW
2045

Content:
Attention Director
Infrastructure Projects, Planning Services
Department of Planning and Environment
Application number SSI 7485
GPO Box 39 Sydney NSW 2001

I object to the SSI 7485. I request that my name and objection be noted and recorded and that my submission is made publicly available

It is acknowledged that the EIS is a concept and can be altered and changed accordingly after approval. This gives the community no ability to trust that there will be no major changes to the EIS if it is decided in the affirmative. Dept of Planning must ensure that there is no approval unless there is a new EIS that is not based on a concept.

I believe the the noise measurements in the EIS are out of date and were taken across the M4-5 Link several years ago. This is not a reflection of sound dispersal now since trees and buildings have been demolished, particularly in the M4East project area in Haberfield and Ashfield. Current figures must be obtained and analysed when the EIS is assessed by Dept of Planning.

It was promised, and was a condition of the M4 East approval that in 2019, all Haberfield and Ashfield above ground WestConnex construction sites were to have been dismantled, as well the Urban Design and Landscape Plan (UDLP) completed and Legacy Project `surplus lands and property' delivered back to the community with community consultation on how surplus land would be restored to the community in 2019. I object that the M4-M5 project proposes to deny what was originally promised to the Haberfield and Ashfield community in 2019.

.

The M4EAst project has had regular out of hours work scheduled particularly in relation to Utilities work since work began. I receive a weekly update from the Project with the next week's out of hours work scheduled. This means that out of hours work is the norm and not an exception. All Utilities work hours must be the same as Construction work hours. This will prevent overnight work from being done and there will be no total turmoil that has affected Haberfield and Ashfield residents when overnight work is done for Utilities.

11.4.1 Potential AIr Quality Impacts. Residents in Haberfield and Ashfield have had large periods of dust with no mitigation. The claim that dust mitigation failures will be `shortlived' is not the real experience that we are suffering currently. How will you ensure the shortlived dust mitigation measures.

[redacted]

Submission: Online Submission from Cynthia Moore (object)
https://majorprojects.accelo.com/?action=view_activity&id=228189

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247

[redacted]

From: Cynthia Moore <campaigns@good.do>
Sent: Monday, 16 October 2017 10:51 AM
To: DPE CSE Information Planning Mailbox
Subject: Submission to WestConnex New M4/M5 EIS, project number SSI 16_7485

Attention Director Infrastructure Projects, Planning Services Department of Planning and Environment Application number SSI 7485 GPO Box 39 Sydney NSW 2001

It is acknowledged that the EIS is a concept and can be altered and changed accordingly after approval. This gives the community no ability to trust that there will be major changes to the EIS if it is decided in the affirmative. Dept of Planning must ensure that there is no approval unless there is a new EIS discounting this possibility.

I object to the SSI 7485. I request that my name and objection be noted and recorded and that my submission is made publicly available.

I believe the the noise measurements in the EIS are out of date and were taken across the M4-5 Link several years ago. This is not a reflection of sound dispersal now since trees and buildings have been demolished, particularly in the M4East project area in Haberfield and Ashfield. The current figures must be analysed when the EIS is assessed by Dept of Planning.

It was promised, and was a condition of the M4 East approval that in 2019, all Haberfield and Ashfield above ground WestConnex construction sites were to have been dismantled, as well the Urban Design and Landscape Plan (UDLP) completed and Legacy Project 'surplus lands and property' delivered back to the community with community consultation on how surplus land would be restored to the community in 2019. I object that the M4-M5 project proposes to deny what was originally promised to the Haberfield and Ashfield community in 2019. . The M4EAst project has had regular out of hours work scheduled particularly in relation to Utilities work since work began. I receive a weekly update from the Project with the next week's out of hours work scheduled. This means that out of hours work is the norm and not an exception. All Utilities work hours must be the same as Construction work hours. This will prevent overnight work from being done and there will be no total turmoil that has affected Haberfield and Ashfield residents when overnight work is done for Utilities.

11.4.1 Potential AIr Quality Impacts. Residents in Haberfield and Ashfield have had large periods of dust with no mitigation. The claim that dust mitigation failures will be 'shortlived' is not the real experience that we are suffering currently. How will you ensure the shortlived dust mitigation measures.

Yours sincerely, Cynthia Moore 180 Alt Street Haberfield 2045

_____ This email was sent by Cynthia Moore via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol FC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Cynthia provided an email address (cynthial.moore@gmail.com) which we included in the REPLY-TO field.

Please reply to Cynthia Moore at cynthial.moore@gmail.com.

To learn more about Do Gooder visit www.dogooder.co To learn more about web protocol FC 3834 visit: www.rfc-base.org/rfc-3834.html

From: [redacted]
Sent: Mon, 16 Oct 2017 16:54:50 +0000
To: [redacted]
Subject: FW: Submission Details for Benjamin Driver (object)

From: system@accelo.comOn Behalf OfBenjamin Driver
Sent: Monday, 16 October 2017 4:49:04 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [redacted]
Subject: Submission Details for Benjamin Driver (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Benjamin Driver
[redacted]

Address:
[redacted]

Elizabeth Bay, NSW
2011

Content:
Attn: Secretary, re: WestConnex M4/M5 EIS, Project Number SSI 16_7485.

SUBMISSION OF OBJECTION TO WESTCONNEX M4/M5 LINK EIS.

I write to wholly reject the proposed Westconnex m4/m5 link as detailed in the EIS, as well as earlier stages upon which this stage relies. We urge the Department to reject the proposal and offer the following justifications:

1 CONTENT OF THE EIS

EIS Is effectively a 7,000+ page lie. It makes significant assertions on cost, time savings, urban design outcomes and delivery which are unsubstantiated and wildly variable.
As has been the case with many so-called State Significant Development, this EIS is Obfuscation masquerading as information, unable to provide the necessary long term benefits and assurances to benefit Sydney - and should be rejected.

Traffic growth in Sydney has been largely static since 2006, so why build any new motorways, let alone the orgy of motorways currently proposed, when we know that the addition of motorways are themselves the major inducement to increased car use?

Yet, dubious traffic modelling suggests that many urban roadways, namely the Anzac Bridge are already at 100% capacity. This assertion is a clear contradiction to the justifications offered for building Westconnex in the first place. Any rational proposal surely should have to prove that it does NOT add to the severity of current congestion, but reduces ACTUAL numbers, offering alternatives which relieve congestion in a socially, environmentally and financially responsible way.

Following on from this, current deformation of multiple intersection within 3km of St Peters interchange which will be beyond capacity demonstrate that Westconnex is to have detrimental impacts well beyond its immediate boundaries, at great cost. On basic assessment, this is wholly unacceptable.

The EIS is based on built in numbers / assumptions for northern beaches extension, but ignores actual committed actions such as Euston Rd / McEvoy St widening and merge, King St gateway, Anzac Pde / Alison Rd atrocity, widening of Gardeners Rd and other road upgrades, which are to be publicly funded by RMS, further increasing the direct and indirect costs and physical damage to the city.

2 TRANSPARENCY AND ACCOUNTABILITY

Stage 3 does not make financial sense, doesn't post validate Stages 1 and 2. Justification is inadequate, and appears to run against the public interest, favouring that of the private.

The project appears to be driven by private profit not public interest, already indicated by the potential partial or whole sale before stage 3 is even underway. Private profiteering at the expense of good city planning, transport and environment is anti-democratic and risks long term damage to the urban environment, health, mobility and trust in government.

The delivery of private toll roads such as Westconnex guarantees profit for private operators, at expense of future NSW Governments and its citizens.

Does the privatisation contract or any other confidential document include a 'no competition' clause? What are the terms, and how will these be explicitly revealed to the public, who under representation of the government, appear to be bearing all of the risk?

How will the government guarantee that the fallout and subsequent costs are not left to public purse to remedy the failings of the privatised motorway?

3 URBAN DESIGN AND LIVEABILITY

No element of the EIS justifies this project on the basis of best-practice urban design. Motorways are mono-functional, and exclude critical ingredients of the city which are democratic and essential for quality city life. They are divisive and isolating, and their noise and pollution diminish amenity well beyond their immediate boundaries. Motorways are inappropriate urban places, and should be progressively removed to benefit the long term health and liveability of our cities, with available funding redirected to public transport projects.

Progressive cities around the world, including direct competitors of Sydney are doing the opposite to what is proposed for Westconnex:

- Paris has closed Right Bank motorway along the Seine and converted it into a promenade, returning alienated public land to people and multiple modes;
- Seoul removed its central motorway outright, and reinstated the river as public park and promenade providing quality environmental and recreation space; and
- San Francisco demolished its inner-city Embarkadero motorway, greatly enhancing the ability for the city to connect to its waterfront.

Increased traffic will impact directly on the ability to provide efficient and reliable bus services. The open wounds proposed will have dramatic effects on the ability to provide active transport opportunities, on street trees, on pedestrian amenity and on surrounding residential environments. Already disgraceful and unnecessary damage has occurred to Sydney Park, and loss of trees along Euston Road and Campbell Rd is an aggressive attack on the city. The direct loss of amenity, privacy, biodiversity and character are

but a number of outcomes which leave a lasting negative effect on the city. The ability of the city to fight urban heat island effect is greatly reduced, risking public health and putting critical infrastructure at risk - resulting in cost increases in other areas - i.e health. Many 100's of trees have already been lost for the construction of Westconnex, and this strategy should be halted and the severity of intervention thoughtfully considered to maintain and enhance the city's character, not eliminate it.

The indicative design for the Rozelle Interchange should be rejected, outright. The design is irrational and profligate, and completely inappropriate. The fact that Sydney Motorway Corporation has not been able to identify any other similar underground interchange project anywhere in the world or find a construction company to build it is an indictment. The EIS should be rejected because it would be absurd to approve such a design concept without evidence that it could be constructed. It would also be absurd to place conditions on a project for which even the most basic details are not known.

The EIS suggest a number of other profligate and inappropriate motorway extensions which are also un-detailed:

- F6 - through much needed urban parklands, significant wetlands and residential neighbourhoods. This corridor is highly suited to public transport alternatives, such as metro, which can be much better integrated into the urban fabric and reduce ACTUAL traffic numbers;
- Western Harbour tunnel - which will draw increased numbers of trucks and vehicles to areas currently already feeling the pressure of congestion. This increased traffic will require significant numbers of unfiltered exhaust stacks - greatly diminishing local amenity and risking the health of tens of thousands of residents through its concentrated output; and
- Expressway to Northern Beaches - would introduce a motorway in place of a rapid public transport service to an area traditionally poorly serviced by public transport. It is imperative that the construction of a rail line providing frequent rail services be put well above that of a motorway for this region of Sydney.

4 LACK OF ALTERNATIVES

SMC was required to consider alternatives. This section in the EIS is superficial at best and fails to provide for best practice, world class transport planning. A scant analysis of alternatives depicts a charade that treats the people of NSW, and future generations, as mugs. Sham assessment of other options, especially public transport alternatives, appears disingenuous and against best-practice.

The City of Sydney has recently generated a well thought out alternative plan which has been ignored in the EIS. This indicates the outcome has been decided, with the EIS offering no meaningful consultation or alternative to improve the proposal.

The SMC should be required to engage with the City of Sydney plan and to respond to it. Any responsible system of planning governance would require this. A number of further alternatives exist and should be fully explored before any motorway project is built:

- Demand management / reduction scenarios such as Congestion Charges, rather than tollways, have been ignored as alternatives. These systems exist worldwide and have been successful for decades;

- Metro rail. At the same NSW govt is building a metro line under the most traffic-affected areas of Alexandria, St Peters, Waterloo, but the there are no stops. No other city in the world is is building 8km of metro line under densely populated areas without stations. There should be at minimum 3 additional stations between the proposed Waterloo stop and Sydenham. The lack of stations demonstrate a deliberate failure to increase coverage of the public transport system, which may in fact be holding up the dubious traffic numbers of Westconnex in this EIS;

Were stations appropriately built at the correct (world's best practice) distances, how many vehicles underpinning the justification of Westconnex would disappear?;

At a minimum, stations should be provided at St Peters serving also Sydney Park, Euston Rd in Alexandria and an Interchange with Green Square;

Why was Waterloo Station placed so close to the existing Redfern Station - where catchments overlap and recent and future renewal sites in East Redfern and Victoria Park are out of reach?;

- Duplication of Port Botany Freight rail line and inter-modals to substantially reduce truck movements. This is decades overdue, and a significant upgrade to freight services which are of a 3rd-world quality;

- Light rail lines - to serve the intensive increased density in East Redfern, Green square, Rosebery and linking anticipated uplift in the eastern suburbs currently lacking any structural rail options; and
- An integrated network of separated on street Cycle ways.

All of these real alternatives should be done in preference to any motorway construction, and this EIS rejected until all alternatives explored thoroughly. Each of these have the ability to REDUCE the mode-share of private vehicles and trucks, and return streets to manageable conditions where they function for multiple modes, the environment, and public life.

I urge the Secretary of NSW Planning to advise the Minister to reject this EIS, and publish my name and submission in accordance with the undertaking on your website, and provide a written response to each of the objections I have raised.

Benjamin Driver
202/2 Elizabeth Bay Road,
Elizabeth Bay 2011
0412881732

[redacted]

Submission: Online Submission from Benjamin Driver (object)
https://majorprojects.accelo.com/?action=view_activity&id=228199

Submission for Job: #7485 WestConnex M4-M5 Link
https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link
https://majorprojects.accelo.com/?action=view_site&id=3247