

**From:** Sophie Martin <campaigns@good.do>  
**Sent:** Sunday, 15 October 2017 7:13 AM  
**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.

**SUBMISSION OF OBJECTION TO WESTCONNEX M4/M5 LINK EIS.** I am deeply concerned about, and strongly object to this proposal in its entirety 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. NSW Planning must reject this EIS and instead recommend to the NSW government that there should be an independent review of WestConnex before more billions are spent and more residents' lives are damaged.

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. This means the community will have limited say in the management of the impacts identified in the EIS. The EIS needs to provide an opportunity for the community to meaningfully input into this report and approval conditions.

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.

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 and also be greatly increased if Stage 3 were ever completed. It states that Stage 3 would 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. 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 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.

The EIS states, there are at least 5 schools that will be in the orbit of these poisonous fumes. Children and the elderly are most at risk of lung ailments. The Education Minister Rob Stokes declared in 2017, that "No ventilation shafts will be built near any school." in his electorate. The same should be applied in all areas of Sydney and the government needs to urgently review its policy of support for unfiltered stacks.

I object to the use of Darley Rd, Leichhardt as a drive 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 and anyone who have driven there knows, 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 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. 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. An EIS based on inaccurate traffic analysis cannot be approved.

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.

We are 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.

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.

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.

The Environmental Impact Statement for Stage 3 admits that the traffic around St Peters will be worse when both stages are completed. So the community would have to put up with the exhaust from tunnels and 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.

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.

During the Stage one consultation phase, residents were repeatedly told that after construction of the M4 East, there would be no more above ground construction in Haberfield. It now appears that they were misled. SMC is already preparing its Preferred Infrastructure Report which will include its final choice of option. I demand that this report be made public as soon as it is filed with NSW Planning and that residents be given a right to consultation on the actual plan before a determination on this EIS application is made by NSW Planning.

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 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 even notified of feedback sessions. 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'.

SMC was required to consider alternatives. This section in the EIS is tokenistic at best. The City of Sydney came up with a well thought out alternative plan and this has been ignored in the EIS.

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 objections I have raised.

Yours sincerely, Sophie Martin 154 Union St, Erskineville NSW 2043, Australia

\_\_\_\_\_ This email was sent by Sophie Martin 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 Sophie provided an email address (sophie\_martin@yahoo.com) which we included in the REPLY-TO field.

Please reply to Sophie Martin at sophie\_martin@yahoo.com.

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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.

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Yours sincerely, Jan Simpson

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**From:** Jacqueline Bouf <campaigns@good.do>  
**Sent:** Sunday, 15 October 2017 8:05 PM  
**To:** DPE CSE Information Planning Mailbox  
**Subject:** Submission to WestConnex New M4/M5 EIS, project number SSI 16\_7485

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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 objections I have raised. Inevitably, eventually, there will be class action lawsuits about this. Nowhere else in the first world does this happen.

Yours sincerely, Jacqueline Bouf

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It is not in the public interest to build unfiltered exhaust stacks anywhere in Sydney, let alone three or four in a single area. I am particularly concerned that schools would be near such unfiltered stacks. I strongly object to the building of unfiltered exhaust stacks. They are POLLUTION, if the name itself doesn't clearly tell you that.

I strongly object to this proposal in its entirety 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. NSW Planning must reject this EIS and instead recommend to the NSW government that there should be an independent review of WestConnex before more billions are spent and more residents' lives are damaged.

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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.

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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 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 and anyone who have driven there knows, 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.

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. 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. An EIS based on inaccurate traffic analysis cannot be approved.

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.

We are 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.

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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.

The Environmental Impact Statement for Stage 3 admits that the traffic around St Peters will be worse when both stages are completed. So the community would have to put up with the exhaust from tunnels and 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.

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.

During the Stage one consultation phase, residents were repeatedly told that after construction of the M4 East, there would be no more above ground construction in Haberfield. It now appears that they were misled. SMC is already preparing its Preferred Infrastructure Report which will include its final choice of option. I demand that this report be made public as soon as it is filed with NSW Planning and that residents be given a right to consultation on the actual plan before a determination on this EIS application is made by NSW Planning.

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 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 even notified of feedback sessions. 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'.

SMC was required to consider alternatives. This section in the EIS is tokenistic at best. The City of Sydney came up with a well thought out alternative plan and this has been ignored in the EIS.

I urge the Secretary of NSW Planning to advise the Minister to reject this EIS, publish my submission (but redact my name in all instances) in accordance with the undertaking on your website, and provide a written response to each of the objections I have raised.

Yours sincerely, S Skellam 2217 Kogarah

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This email was sent by S Skellam 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](mailto:campaigns@good.do), however S provided an email address ([s.skellam.work@gmail.com](mailto:s.skellam.work@gmail.com)) which we included in the REPLY-TO field.

Please reply to S Skellam at [s.skellam.work@gmail.com](mailto:s.skellam.work@gmail.com).

To learn more about Do Gooder visit [www.dogooder.co](http://www.dogooder.co) To learn more about web protocol FC 3834 visit: [www.rfc-base.org/rfc-3834.html](http://www.rfc-base.org/rfc-3834.html)

**From:** Samantha English <campaigns@good.do>  
**Sent:** Sunday, 15 October 2017 10:56 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.

## SUBMISSION OF OBJECTION TO WESTCONNEX M4/M5 LINK EIS.

I strongly object to this proposal in its entirety 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. NSW Planning must reject this EIS and instead recommend to the NSW government that there should be an independent review of WestConnex before more billions are spent and more residents' lives are damaged.

Furthermore the claim that the community has been adequately consulted is insulting given that the EIS was released a matter of days after the period for so-called community consultation closed. As per every other part of this process it has been a fait accompli from the beginning with the pretence of including the community in the planning and discussions while in reality completely disregarding their views and showing a complete lack of respect for the local community and the utter disruption this will cause the community for almost a decade.

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. This means the community will have limited say in the management of the impacts identified in the EIS. The EIS needs to provide an opportunity for the community to meaningfully input into this report and approval conditions.

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. Not only is this immoral it is unbelievable that given the vast amount of tax payers money that is being spent on this ill conceived project that adequate funding would not be set aside to protect the health and welfare of children and elderly who are most affected by the pollution from these smokestacks. Even more concerning is the report compiled by a group of respiratory physicians in regards to the unfiltered smokestacks constructed for the NorthConnex tunnel system that was completely ignored endangering the health of the local community.

The EIS states, there are at least 5 schools that will be in the orbit of these poisonous fumes. Children and the elderly are most at risk of lung ailments. The Education Minister Rob Stokes declared in 2017, that "No ventilation shafts will be built near any school." in his electorate. The same should be applied in all areas of Sydney and the government needs to urgently review its policy of support for unfiltered stacks.

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This is negligent when you consider that the World Health Organisation in 2012 declared diesel particulates carcinogenic.

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.

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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 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. 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. An EIS based on inaccurate traffic analysis cannot be approved.

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.

We are 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)

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The Environmental Impact Statement for Stage 3 admits that the traffic around St Peters will be worse when both stages are completed. So the community would have to put up with the exhaust from tunnels and 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.

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.

During the Stage one consultation phase, residents were repeatedly told that after construction of the M4 East, there would be no more above ground construction in Haberfield. It now appears that they were misled. SMC is already preparing its Preferred Infrastructure Report which will include its final choice of option. I demand that this report be made public as soon as it is filed with NSW Planning and that residents be given a right to consultation on the actual plan before a determination on this EIS application is made by NSW Planning.

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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 objections I have raised.

Yours sincerely, Samantha English Haberfield

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This email was sent by Samantha English 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 Samantha provided an email address (camu\_english@bigpond.com) which we included in the REPLY-TO field.

Please reply to Samantha English at camu\_english@bigpond.com.

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Attention: Director  
Infrastructure Projects, Planning Services  
Department of Planning and Environment  
Application Number: SSI 7485  
GPO Box 39,  
SYDNEY. NSW 2001

THEA Y GOLE 906406  
15/10/2017

To Whom It May Concern

I am deeply concerned by findings outlined in the Westconnex M4-M5 (the "Project") Environmental Impact Statement ("EIS")

In particular, the current Project design results in multiple tunnels b beneath the area roughly bounded by Albert St, Foucart St, Cheltenham St and Denison St (the "Neighbourhood") for the Iron Cove Link, Western Harbour Tunnel links and for exhaust ventilation tunnels.

**The Western Sydney Harbour Tunnels are particularly concerning given they are proposed to be at an unnecessarily shallow depth of less than 10m (EIS pg 6-25, Appendix E pg 17) which is otherwise only proposed at tunnel entry and exit points. They are also for a project which is years away from approval and may never proceed.**

The EIS states that the above tunnels will result in the following impacts to our Neighbourhood:


- Higher ground borne noise than recommended night time levels of 35dB for periods of up to 19 days (EIS pg 10-128 and 10-129) and "Due to the number of tunnels being constructed in this area (consecutive construction works) the duration of impacts may extend at these locations". **This is highly likely to impact our sleep, mental health and comfort and is absolutely unacceptable**
- Ground movement above the preferred criteria of 20mm and up to 35mm for some properties (EIS pg 12-39, 12-44). This is highly likely to cause significant, irreversible and unacceptable structural damage to our properties.

**We are outraged and demand that: No tunnelling of the Western Harbour Tunnel connections proceed in our Neighbourhood until that project is approved in its entirety**

- **The depth of the Western Harbour Tunnel connections be increased to at a minimum, reduce ground movement settlement in this neighbourhood to below the 20mm EIS criteria**
- **Conditions of approval of the Project include clear mitigation strategies to ensure ground borne noise does not exceed the recommended night time NML of 35dB for extended periods on repeat occasions in our Neighbourhood**

**I look forward to your urgent response to the serious concerns raised**

Yours Sincerely

  
Thea Y Gole  
Resident / Owner  
9A Easton Street  
ROZELLE 2039

**From:** jacinta mcmanus <campaigns@good.do>  
**Sent:** Sunday, 15 October 2017 3:07 PM  
**To:** DPE CSE Information Planning Mailbox  
**Subject:** [SPAM DETECTED BY EXO] Submission to WestConnex New M4/M5 EIS, project number SSI 16\_7485

Attn: Secretary, re: WestConnex M4/M5 EIS, Project Number SSI 16\_7485.

## SUBMISSION OF OBJECTION TO WESTCONNEX M4/M5 LINK EIS.

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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.

Moreover, the position of the 3 stacks adjacent to the City Westlink, are in a geographical "hotspot". Little, if any breeze moves through that area, making it seemingly impossible for the unfiltered tunnel air to disperse.

The EIS states, there are at least 5 schools that will be in the orbit of these poisonous fumes. Children and the elderly are most at risk of lung ailments. The Education Minister Rob Stokes declared in 2017, that "No ventilation shafts will be built near any school." in his electorate. The same should be applied in all areas of Sydney and the government needs to urgently review its policy of support for unfiltered stacks.

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 beyond negligent when you consider that the World Health Organisation in 2012 declared diesel particulates carcinogenic.

It is interesting to note that our current Premier, whilst in opposition, had quite a different view about unfiltered stacks. Her hypocrisy is breathtaking. I am quite certain no unfiltered stacks would be built in close proximity to her own residence, given her own, publicly declared view on their merit.

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.

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We are 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)

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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.

The Environmental Impact Statement for Stage 3 admits that the traffic around St Peters will be worse when both stages are completed. So the community would have to put up with the exhaust from tunnels and 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.

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.

During the Stage one consultation phase, residents were repeatedly told that after construction of the M4 East, there would be no more above ground construction in Haberfield. It now appears that they were misled. SMC is already preparing its Preferred Infrastructure Report which will include its final choice of option. I demand that this report be made public as soon as it is filed with NSW Planning and that residents be given a right to consultation on the actual plan before a determination on this EIS application is made by NSW Planning.

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 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 even notified of feedback sessions. 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'.

SMC was required to consider alternatives. This section in the EIS is tokenistic at best. The City of Sydney came up with a well thought out alternative plan and this has been ignored in the EIS.

Have you, the NSW, government learned nothing? Look at the current state of our motorways during peak hour. You had rail infrastructure already present at Rozelle. Yet, in past 2 weeks you have ripped the railway tracks up for this ill-considered debacle you are determined to force upon us.

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 objections I have raised.

Yours sincerely, jacinta mcmanus.

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This email was sent by jacinta mcmanus 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 jacinta provided an email address (jacinta.mcmanus@live.com.au) which we included in the REPLY-TO field.

Please reply to jacinta mcmanus at jacinta.mcmanus@live.com.au.

To learn more about Do Gooder visit [www.dogooder.co](http://www.dogooder.co) To learn more about web protocol FC 3834 visit: [www.rfc-base.org/rfc-3834.html](http://www.rfc-base.org/rfc-3834.html)

**From:** Nicholas Gunn <campaigns@good.do>  
**Sent:** Sunday, 15 October 2017 11:39 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.

## SUBMISSION OF OBJECTION TO WESTCONNEX M4/M5 LINK EIS.

I strongly object to this proposal in its entirety 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. NSW Planning must reject this EIS and instead recommend to the NSW government that there should be an independent review of WestConnex before more billions are spent and more residents' lives are damaged.

I live in Glebe. I am alarmed that a dive site is proposed for Camperdown and the lack of detail included regarding the Rozelle interchange considering the high amount of works proposed for the Crescent. I am also disgusted by the lack of consultation for this project Statewide as it has wide implications for most of Sydney and by extension, NSW because of its cost.

This EIS says that the benefit:cost ratio for Stage 3 is 2.94:1, and that this was known in 2015.

2.94:1 is much higher than the benefit:cost ratio for the project as a whole.

This shows that almost all of the cumulative benefit from all 3 stages comes from Stage 3 alone.

It proves that:

- there is next to no benefit in Stage 1 and Stage 2, and that
- the Government has known this since 2015.

In addition, because the Sydney Airport Gateway has been delayed, there is no benefit in Stage 3 either.

I am also highly concerned about contaminants as a result of excavations. I am beyond alarmed that this EIS has not met the Planning Secretary's SEARS requirements:

"The Proponent must assess whether the land is likely to be contaminated and identify if remediation of the land is required, having regard to the ecological and human health risks posed by the contamination in the context of past, existing and likely (or potential) future land uses. Where assessment and/or remediation is required, the Proponent must document how the assessment and/or remediation would be undertaken in accordance with current guidelines."

The EIS does identify a number of significant contamination risks. A review of Chapter 16 and technical reports shows that there are many medium and high risks to human health and the environment that flow from this proposal. Other than bland statements about future plans, there are no detailed statements about how these will be handled. For this reason the EIS does not meet the SEARS requirements.

The SEARS further state: "The Proponent must assess the impact of any disturbance of contaminated groundwater and the tunnels should be carefully designed so as to not exacerbate mobilisation of contaminated groundwater and/or prevent contaminated groundwater flow."

There is no evidence that the tunnels have been carefully designed to avoid groundwater contamination. For instance, SMC staff have openly stated at public EIS sessions that no detailed engineering design work has occurred on the Rozelle interchange of any kind. There is only a design concept without any detailed design. In these circumstances, it

is not possible for NSW Planning to assess whether a more detailed future design would exacerbate mobilisation of contaminated groundwater and/or prevent contaminated ground water flow. To approve a proposal with identified risks that has so little project detail or mitigation information jeopardises the health of Sydney residents and add to ecological risks, particularly in Rozelle Bay.

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. This means the community will have limited say in the management of the impacts identified in the EIS. The EIS needs to provide an opportunity for the community to meaningfully input into this report and approval conditions.

May I ask, how can the engineering and construction of a State Significant Infrastructure project of this scale and cost be "left up to a builder"? This isn't an extension to the back of a family home or a second bathroom.

The proposed Rozelle civil and tunnel site (C5) at Rozelle and the Crescent Site at Annandale both have severe contamination issues which are rated as High Risk.

Soils at the proposed Rozelle civil and tunnel site have been found to include lead, arsenic, cadmium and zinc exceeding the criteria for open space and commercial/industrial. It is acknowledged in the technical report to the EIS that such contamination could impact on the community. This could occur during the removal of vegetation, ballast stockpile and excavated soil. It could also occur as a result of dewatering and potential contamination of groundwater.

There is also a risk from overland flow and storm water runoff, that could affect the water quality of Easton Park drain, Whites Creek and Rozelle Bay. This endangers the ecological health of the area through potential contamination via overland flow and stormwater runoff which would affect the water quality of the Easton Park drain, Whites Creek and ultimately Rozelle Bay. Acid sulphate soils have been identified which could impact on local soil and water quality. Contamination of groundwater is known to be present, widespread and likely to be exposed. The risk is assessed as 'High'.

To approve such a plan on the basis of a vague and uncertain concept plan and to leave the supply of detailed information to a post -approval stage would be highly irresponsible and cause huge anxiety and alarm in the community. I object to this.

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.

The EIS states, there are at least 5 schools that will be in the orbit of these poisonous fumes. Children and the elderly are most at risk of lung ailments. The Education Minister Rob Stokes declared in 2017, that "No ventilation shafts will be built near any school." in his electorate. The same should be applied in all areas of Sydney and the government needs to urgently review its policy of support for unfiltered stacks.

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 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.

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 and also be greatly increased if Stage 3 were ever completed. It states that Stage 3 would 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. 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 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.

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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 and anyone who have driven there knows, 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 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. 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. An EIS based on inaccurate traffic analysis cannot be approved.

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.

We are 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.

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.

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.

The Environmental Impact Statement for Stage 3 admits that the traffic around St Peters will be worse when both stages are completed. So the community would have to put up with the exhaust from tunnels and 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.

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.

During the Stage one consultation phase, residents were repeatedly told that after construction of the M4 East, there would be no more above ground construction in Haberfield. It now appears that they were misled. SMC is already preparing its Preferred Infrastructure Report which will include its final choice of option. I demand that this report be made public as soon as it is filed with NSW Planning and that residents be given a right to consultation on the actual plan before a determination on this EIS application is made by NSW Planning.

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 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 even notified of feedback sessions. 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'.

SMC was required to consider alternatives. This section in the EIS is tokenistic at best. The City of Sydney came up with a well thought out alternative plan and this has been ignored in the EIS.

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 objections I have raised.

Yours sincerely, Nicholas Gunn 105 St Johns Rd, Glebe NSW 2037, Australia

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This email was sent by Nicholas Gunn 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](mailto:campaigns@good.do), however Nicholas provided an email address ([nickgunn@gmail.com](mailto:nickgunn@gmail.com)) which we included in the REPLY-TO field.

Please reply to Nicholas Gunn at [nickgunn@gmail.com](mailto:nickgunn@gmail.com).

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**From:** Ioannis Anthis <campaigns@good.do>  
**Sent:** Saturday, 14 October 2017 2:04 PM  
**To:** DPE CSE Information Planning Mailbox  
**Subject:** [SPAM DETECTED BY EXO] Submission to WestConnex New M4/M5 EIS, project number SSI 16\_7485

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 this proposal in its entirety and urge the Secretary of Planning to advise the Minister to refuse the application – there should be an independent review of WestConnex before more billions are spent and more residents' lives are damaged.

The EIS is based on an indicative design and has insufficient detail for the impacts to be properly assessed and addressed, and the public consultation has been disgracefully inadequate.

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.

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.

I object to the acquisition of the site where 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 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. 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. An EIS based on inaccurate traffic analysis cannot be approved.

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.

I 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 even notified of feedback sessions. 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'.

SMC was required to consider alternatives. This section in the EIS is tokenistic at best. The City of Sydney came up with a well thought out alternative plan and this has been ignored in the EIS.

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 objections I have raised.

Yours sincerely, Ioannis Anthis 27 Alfred St, Rozelle NSW 2039, Australia



\_\_\_\_\_ This email was sent by Ioannis Anthis 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 Ioannis provided an email address (Y@ANTHIS.NET) which we included in the REPLY-TO field.

Please reply to Ioannis Anthis at [Y@ANTHIS.NET](mailto:Y@ANTHIS.NET).

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**From:** Sarah Mott <campaigns@good.do>  
**Sent:** Saturday, 14 October 2017 6:20 PM  
**To:** DPE CSE Information Planning Mailbox  
**Subject:** [SPAM DETECTED BY EXO] Submission to WestConnex New M4/M5 EIS, project number SSI 16\_7485

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 this proposal in its entirety 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. NSW Planning must reject this EIS and instead recommend to the NSW government that there should be an independent review of WestConnex before more billions are spent and more residents' lives are damaged.

The EIS is based on an indicative design and has insufficient detail for the impacts to be properly assessed and addressed, and the public consultation has been woefully inadequate.

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. This means the community will have limited say in the management of the impacts identified in the EIS. The EIS needs to provide an opportunity for the community to meaningfully input into this report and approval conditions.

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.

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 and also be greatly increased if Stage 3 were ever completed. It states that Stage 3 would 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. 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 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.

The EIS states, there are at least 5 schools that will be in the orbit of these poisonous fumes. Children and the elderly are most at risk of lung ailments. The Education Minister Rob Stokes declared in 2017, that "No ventilation shafts will be built near any school." in his electorate. The same should be applied in all areas of Sydney and the government needs to urgently review its policy of support for unfiltered stacks.

I object to the use of Darley Rd, Leichhardt as a drive 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 and anyone who have driven there knows, 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 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. 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. An EIS based on inaccurate traffic analysis cannot be approved.

The economic basis for this project is the approval of further toll roads. Throughout the EIS there are references to the f6 and Northern beaches Link; it is assumed that these toll roads will, in fact, be built. The issue with this is that the impacts set out in the EIS rely upon them being built – that is, traffic will lessen once they are built. However, there is no certainty this will occur.. Any references to these toll roads, in the context of impacts from this project, need therefore to be disregarded.

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.

We are 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.

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.

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.

The Environmental Impact Statement for Stage 3 admits that the traffic around St Peters will be worse when both stages are completed. So the community would have to put up with the exhaust from tunnels and 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.

During the Stage one consultation phase, residents were repeatedly told that after construction of the M4 East, there would be no more above ground construction in Haberfield. It now appears that they were misled. SMC is already preparing its Preferred Infrastructure Report which will include its final choice of option. I demand that this report be

made public as soon as it is filed with NSW Planning and that residents be given a right to consultation on the actual plan before a determination on this EIS application is made by NSW Planning.

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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 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 even notified of feedback sessions. 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'.

SMC was required to consider alternatives. This section in the EIS is tokenistic at best. The City of Sydney came up with a well thought out alternative plan and this has been ignored in the EIS.

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 objections I have raised.

Yours sincerely, Sarah Mott 21 Regent St, Redfern NSW 2016, Australia

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This email was sent by Sarah Mott 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 Sarah provided an email address (sarah\_mott@live.com.au) which we included in the REPLY-TO field.

Please reply to Sarah Mott at sarah\_mott@live.com.au.

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**From:** Alison Gill <campaigns@good.do>  
**Sent:** Sunday, 15 October 2017 11:29 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 whole WestConnex Stage 3 and in particular the impact it will have on the residents of Newtown, Enmore and Erskineville.

**Traffic** The EIS traffic analysis does not provide results of traffic modelling of any local roads including Erskineville Rd, King St or Enmore Rd. The EIS for the New M5 predicted that 60,000 vehicles extra a day will pour down the widened Euston Rd. These vehicles would either be heading further East, into the CBD or across via Erskineville and other roads to other parts of the Inner West including King Street. Only a small proportion of these vehicles would choose to use a tunnel to Haberfield or Rozelle. Traffic congestion will worsen as a result of WestConnex which will impact on the health of residents, especially those living within 50 metres of roads. Hundreds of people live in units along Euston, Sydney Park, Mitchell and Erskineville Rds. and King Street. Erskineville School and Newtown School are both close to roads. There is also no modelling of Enmore or Edgeware Rd. both of which will be impacted by increased traffic congestion. (There is a large amount of literature which documents this finding).

When EIS consultants at public exhibition events were asked why there was no modelling beyond the corner of Maddox Street and Euston Rd, they told residents that this was mandated by RMS. It is obvious that modelling needs to be done over a larger area to measure the impacts of traffic pouring out of interchange. The reasons for RMS drawing the traffic analysis boundaries so narrowly should be made transparent.

**No Consultation** Residents in the eastern part of Newtown were not notified of the SMC's intention to tunnel under Newtown School and surrounding buildings during the concept design phase. To this day they have never been notified that they could be impacted by WestConnex Stage 3. This is a failure of 'meaningful consultation' which is a requirements of the SEARS for this EIS.

**Tunnelling and Heritage** There has been no evaluation of the potential impacts of tunnelling on hundreds of old buildings including valuable and treasured heritage ones. The documentation of the heritage in Newtown is inadequate. The promise that repairs would be done if damage occurs during tunnelling does not impress or satisfy communities along the tunnel route.

Yours sincerely, Alison Gill

\_\_\_\_\_ This email was sent by Alison Gill 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 Alison provided an email address (alison.gill66@gmail.com) which we included in the REPLY-TO field.

Please reply to Alison Gill at alison.gill66@gmail.com.

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**From:** Katherine Lustig <campaigns@good.do>  
**Sent:** Sunday, 15 October 2017 10:02 PM  
**To:** DPE CSE Information Planning Mailbox  
**Subject:** SUBMISSION: WestConnex New M4/M5 EIS, project number SSI 16\_7485

Attn: Secretary, re: WestConnex M4/M5 EIS, Project Number SSI 16\_7485.

## OBJECTION TO WESTCONNEX M4/M5 LINK EIS.

To whom it may concern,

I strongly object to this proposal and urge you to advise refusal of application. I believe that the Proponent has not adequately addressed the real expected impacts in the Environmental Impact Statement, and for this reason NSW Planning must reject this EIS. Further, there should be an independent review of WestConnex before more money is spent and more residents' lives are detrimentally affected.

It concerns me that the EIS advises it is indicative only "based on a concept design" and that the detail design and construction planning are yet to be undertaken, meaning that the community will have no opportunity to comment on the Preferred Infrastructure Report which forms the basis of the approval conditions. This means the community will have limited say in the management of the impacts identified in the EIS. The EIS needs to provide an opportunity for the community to meaningfully input into this report and approval conditions .

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.

The EIS states, there are at least 5 schools that will be in the orbit of these poisonous fumes. Children and the elderly are most at risk of lung ailments. The Education Minister Rob Stokes declared in 2017, that "No ventilation shafts will be built near any school." in his electorate. The same should be applied in all areas of Sydney and the government needs to urgently review its policy of support for unfiltered stacks.

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 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.

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 and also be greatly increased if Stage 3 were ever completed. It states that Stage 3 would 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. 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 object to the use of Darley Rd, Leichhardt as a drive 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 and anyone who have driven there knows, 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 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. 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. An EIS based on inaccurate traffic analysis cannot be approved.

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.

We are 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.

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.

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.

The Environmental Impact Statement for Stage 3 admits that the traffic around St Peters will be worse when both stages are completed. So the community would have to put up with the exhaust from tunnels and 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.

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.

During the Stage one consultation phase, residents were repeatedly told that after construction of the M4 East, there would be no more above ground construction in Haberfield. It now appears that they were misled. SMC is already

preparing its Preferred Infrastructure Report which will include its final choice of option. I demand that this report be made public as soon as it is filed with NSW Planning and that residents be given a right to consultation on the actual plan before a determination on this EIS application is made by NSW Planning.

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 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 even notified of feedback sessions. 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'.

SMC was required to consider alternatives. This section in the EIS is tokenistic at best. The City of Sydney came up with a well thought out alternative plan and this has been ignored in the EIS.

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 objections I have raised.

Yours sincerely, Katherine Lustig 2/12 Kensington Rd, Summer Hill NSW 2130, Australia

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This email was sent by Katherine Lustig 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](mailto:campaigns@good.do), however Katherine provided an email address ([katherine.lustig@gmail.com](mailto:katherine.lustig@gmail.com)) which we included in the REPLY-TO field.

Please reply to Katherine Lustig at [katherine.lustig@gmail.com](mailto:katherine.lustig@gmail.com).

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**From:** paul edward Jeffery <campaigns@good.do>  
**Sent:** Monday, 16 October 2017 7:33 AM  
**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.

#### SUBMISSION OF OBJECTION TO WESTCONNEX M4/M5 LINK EIS.

I strongly object to this proposal in its entirety 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. NSW Planning must reject this EIS and instead recommend to the NSW government that there should be an independent review of WestConnex before more billions are spent and more residents' lives are damaged. Pollution is trapped in the natural Sydney basin area and for the government, smc and westconnex to be advocating unfiltered exhaust tunnels within the basin close to where people live, work and go to school is unconscionable. That there are no traffic modelling figures in the EIS to show what will happen to all the roads surrounding the proposed M4-5 link is absolutely brainless and takes local residents for idiots. Induced traffic appears to be a well known phenomena to everyone but the proponents and to propose this 1950's idea to solve Sydney's traffic congestion show how ideology has taken precedence over commonsense as mass public transport could do the job cheaper cleaner and better in every way. 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. This means the community will have limited say in the management of the impacts identified in the EIS. The EIS needs to provide an opportunity for the community to meaningfully input into this report and approval conditions. The design and construct way of building is known within the building industry as a way to get cheap shoddy work done quickly and all the quality components are quickly substituted for items that will pass the inspection but would not last too much longer. For the NSW government and SMC to be foisting this way of building infrastructure on the NSW public can only be a last desperate act to get the

project finished and off the books before the next state elections. This is massive short term thinking at its worst.

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.

The EIS states, there are at least 5 schools that will be in the orbit of these poisonous fumes. Children and the elderly are most at risk of lung ailments. The Education Minister Rob Stokes declared in 2017, that "No ventilation shafts will be built near any school." in his electorate. The same should be applied in all areas of Sydney and the government needs to urgently review its policy of support for unfiltered stacks.

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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.

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SMC was required to consider alternatives. This section in the EIS is tokenistic at best. The City of Sydney came up with a well thought out alternative plan and this has been ignored in the EIS.

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 objections I have raised.

Yours sincerely, paul edward Jeffery 28 National St, Leichhardt NSW 2040, Australia

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Please reply to paul edward Jeffery at paulnjill@iinet.net.au.

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

Name: PAUL EDWARD SEFFERTY

Signature: PE Sefferty

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

Address: 28 NATIONAL ST

Suburb: LEICHHARDT 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

- ✦ We 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.
- ✦ Tunnel depths the tunnel depths for the Leichhardt area as low as 35 metres. This creates and unacceptable risk of damage to homes due to settlement (ground movement). The EIS acknowledges that at tunnelling at 35 metres and less this is a real risk. There is no mitigation provided for this risk. Instead, it states that properties will be repaired at the Government's expense. However no details or assurance as to how this will occur are provided. The project should not be approved with such tunnelling depths permitted and with no detail as to the extent of damage and how and when it will be repaired. It will lead to the situation where residents and businesses are forced to engage structural engineers and lawyers to prove that the damage was linked to Westconnex works, with no assurance that this property damage will be promptly and satisfactorily fixed.
- ✦ 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.
- ✦ 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.
- ✦ The presence of 170 heavy and light vehicle movements a day at this site will create an unacceptable risk to students. The EIS should not permit any truck movements near the Darley Road site. The alternative proposal which provides that all spoil trucks enter and leave from the City West link is the only proposal that should be considered.
- ✦ 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.

**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 \_\_\_\_\_

**From:** [REDACTED] <campaigns@good.do>  
**Sent:** Saturday, 14 October 2017 10:06 AM  
**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.

## SUBMISSION OF OBJECTION TO WESTCONNEX M4/M5 LINK EIS.

I strongly object to this proposal in its entirety 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. NSW Planning must reject this EIS and instead recommend to the NSW government that there should be an independent review of WestConnex before more billions are spent and more residents' lives are damaged.

The EIS is based on an indicative design and has insufficient detail for the impacts to be properly assessed and addressed, and the public consultation has been woefully inadequate.

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. This means the community will have limited say in the management of the impacts identified in the EIS. The EIS needs to provide an opportunity for the community to meaningfully input into this report and approval conditions.

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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 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. 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. An EIS based on inaccurate traffic analysis cannot be approved.

The economic basis for this project is the approval of further toll roads. Throughout the EIS there are references to the f6 and Northern beaches Link; it is assumed that these toll roads will, in fact, be built. The issue with this is that the impacts set out in the EIS rely upon them being built – that is, traffic will lessen once they are built. However, there is no certainty this will occur – indeed, the State Opposition is opposed to both projects. Any references to these toll roads, in the context of impacts from this project, need therefore to be disregarded.

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.

We are 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.

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.

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 much more. SMC has failed to comply with the environmental protection licence that it was granted as part of previous approvals. I am appalled that these odours are predicted to possibly continue if Stage 3 is approved. No community should be treated in this manner.

The Environmental Impact Statement for Stage 3 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.

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. During the Stage one consultation phase, residents were repeatedly told that after construction of the M4 East, there would be no more above ground construction in Haberfield. It now appears that they were misled. SMC is already preparing its Preferred Infrastructure Report which will include its final choice of option. I demand that this report be made public as soon as

it is filed with NSW Planning and that residents be given a right to consultation on the actual plan before a determination on this EIS application is made by NSW Planning.

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.

I 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 even notified of feedback sessions. 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 high number of residents in both Haberfield and Leichhardt who would require mitigation for horrific night noise is unacceptable, particularly because promises of mitigation in Haberfield and St Peters during Stage 2 have not offered adequate protection. The Darley Road proposed construction site has been rejected as highly unsuitable by the Inner Council Council, its traffic planners and the independent engineer appointed by the council. In fact, the intersection near the site 9 James St and City west Lik, based on TfNSW's own data, is the third most dangerous intersection in the inner west. despite that, SMC wishes to bring in 100 heavy vehicle movements a day, plus an additional 70 light vehicle movements. There have been two fatalities directly out front the proposed site and it belied belief that SMC could seriously consider running hundreds of trucks and heavy machinery into a known traffic and accident black spot.

SMC was required to consider alternatives. This section in the EIS is tokenistic at best. The City of Sydney came up with a well thought out alternative plan and this has been ignored in the EIS.

I can't sleep at night due to the noise and vibrations..

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 objections I have raised.

Yours sincerely, [REDACTED]

\_\_\_\_\_ This email was sent by [REDACTED] 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 [REDACTED] provided an email address [REDACTED] which we included in the REPLY-TO field.

Please reply to [REDACTED]

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**From:** [REDACTED] <campaigns@good.do>  
**Sent:** Saturday, 14 October 2017 10:06 AM  
**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.

## SUBMISSION OF OBJECTION TO WESTCONNEX M4/M5 LINK EIS.

I strongly object to this proposal in its entirety 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. NSW Planning must reject this EIS and instead recommend to the NSW government that there should be an independent review of WestConnex before more billions are spent and more residents' lives are damaged.

The EIS is based on an indicative design and has insufficient detail for the impacts to be properly assessed and addressed, and the public consultation has been woefully inadequate.

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. This means the community will have limited say in the management of the impacts identified in the EIS. The EIS needs to provide an opportunity for the community to meaningfully input into this report and approval conditions.

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.

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 and also be greatly increased if Stage 3 were ever completed. It states that Stage 3 would 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. 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 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.

The EIS states, there are at least 5 schools that will be in the orbit of these poisonous fumes. Children and the elderly are most at risk of lung ailments. The Education Minister Rob Stokes declared in 2017, that "No ventilation shafts will be built near any school." in his electorate. The same should be applied in all areas of Sydney and the government needs to urgently review its policy of support for unfiltered stacks.

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 and anyone who have driven there knows, 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.

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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.

We are 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)

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SMC was required to consider alternatives. This section in the EIS is tokenistic at best. The City of Sydney came up with a well thought out alternative plan and this has been ignored in the EIS.

I am in a location severely impacted by the proposed Rozelle interchange with multiple tunnels proposed directly under our house. I am still not able to get details of the depth of the tunnels under our location to then determine the potential impact. I have attended briefing sessions and staff looked at me blankly and could not provide any details.

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 objections I have raised.

Yours sincerely, [REDACTED]

\_\_\_\_\_ This email was sent by [REDACTED] 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 [REDACTED] provided an email address [REDACTED] which we included in the REPLY-TO field.

Please reply to [REDACTED]

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[REDACTED]

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**From:** [REDACTED] <campaigns@good.do>  
**Sent:** Saturday, 14 October 2017 11:25 AM  
**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.

**SUBMISSION OF OBJECTION TO WESTCONNEX M4/M5 LINK EIS.**

I strongly object to this proposal in its entirety 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. NSW Planning must reject this EIS and instead recommend to the NSW government that there should be an independent review of WestConnex before more billions are spent and more residents' lives are damaged.

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 objections I have raised.

Yours sincerely, [REDACTED]

\_\_\_\_\_ This email was sent by [REDACTED] 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 [REDACTED] provided an email address [REDACTED] which we included in the REPLY-TO field.

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**From:** [REDACTED] <campaigns@good.do>  
**Sent:** Monday, 16 October 2017 9:11 AM  
**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.

## SUBMISSION OF OBJECTION TO WESTCONNEX M4/M5 LINK EIS.

Please halt this project before further damage is done. I strongly object to this proposal in its entirety 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. NSW Planning must reject this EIS and instead recommend to the NSW government that there should be an independent review of WestConnex before more billions are spent and more residents' lives are damaged.

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. This means the community will have limited say in the management of the impacts identified in the EIS. The EIS needs to provide an opportunity for the community to meaningfully input into this report and approval conditions .

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.

The EIS states, there are at least 5 schools that will be in the orbit of these poisonous fumes. Children and the elderly are most at risk of lung ailments. The Education Minister Rob Stokes declared in 2017, that "No ventilation shafts will be built near any school." in his electorate. The same should be applied in all areas of Sydney and the government needs to urgently review its policy of support for unfiltered stacks.

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 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.

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 and also be greatly increased if Stage 3 were ever completed. It states that Stage 3 would 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. 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 object to the use of Darley Rd, Leichhardt as a drive 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 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. 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. An EIS based on inaccurate traffic analysis cannot be approved.

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.

We are 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.

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.

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.

During the Stage one consultation phase, residents were repeatedly told that after construction of the M4 East, there would be no more above ground construction in Haberfield. It now appears that they were misled. SMC is already preparing its Preferred Infrastructure Report which will include its final choice of option. I demand that this report be made public as soon as it is filed with NSW Planning and that residents be given a right to consultation on the actual plan before a determination on this EIS application is made by NSW Planning.

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 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 even notified of feedback sessions. 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'.

SMC was required to consider alternatives. This section in the EIS is tokenistic at best. The City of Sydney came up with a well thought out alternative plan and this has been ignored in the EIS.

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, [REDACTED]

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Please reply to [REDACTED]

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**From:** [REDACTED]<campaigns@good.do>  
**Sent:** Monday, 16 October 2017 8:49 AM  
**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.

# SUBMISSION OF OBJECTION TO WESTCONNEX M4/M5 LINK EIS.

I am writing to make a submission on the incompleteness of the EIS. As demonstrated below there are a number of points that have not been adequately addressed.

Clarifications around traffic modelling assumptions In "Chapter 8: Traffic and Transport", numerous assertions are made based on traffic modelling into the future, in particular the years 2023 and 2033. These predictions are based on the volume of traffic if the project is built compared with the scenario where it is not.

These predictions are fundamental to the need for the project. However, there is no detail that I could find in the EIS outlining how this traffic modelling was conducted and what metrics were used to calculate the predicted future volumes.

Therefore, please could you clarify how this data was modelled providing as much detail as possible. In particular I would like to know if the following facts and scenarios were taken into consideration?

The increase in the use of autonomous vehicles in the near to medium term. It is well documented that "self-driving cars" are predicted to use road space much more efficiently and will also require less parking spaces hence freeing up more road space on arterial highways Improved public transport options. In particular an increase in the frequency of bus service routes and dedicated bus lanes. The increased propensity for current commuters to work remotely and hence decrease the number of single occupant car users. The possibility of introducing vehicle congestion charging. CBD congestion charging has worked successfully in other major cities resulting in reduced traffic volumes through those urban areas Impact on ANZAC Bridge East Bound Traffic The EIS mentions that congestion is likely to increase on the east bound carriageways on the ANZAC bridge but does not provide any solution.

Has the possibility of a dedicated bus lane on the east bound side of the bridge been considered? Since WestConnex will now dump thousands of vehicles on the bridge in the morning rush hour that are currently filtered by numerous sets of light on the City West Link and Victoria Road the bridge is highly likely to become filled with the same traffic that is currently attempting to enter the CBD but with the same limited flow through the city due to traffic lights on the western side of the CBD. A dedicated AM bus lane would at least prioritise public transport users above single occupant car use.

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 objections I have raised.

Yours sincerely, [REDACTED]

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Please reply to [REDACTED]



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**From:** [REDACTED] <campaigns@good.do>  
**Sent:** Monday, 16 October 2017 8:49 AM  
**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.

## SUBMISSION OF OBJECTION TO WESTCONNEX M4/M5 LINK EIS.

I am writing to make a submission on the incompleteness of the EIS. As demonstrated below there are a number of points that have not been adequately addressed.

Clarifications around traffic modelling assumptions In "Chapter 8: Traffic and Transport", numerous assertions are made based on traffic modelling into the future, in particular the years 2023 and 2033. These predictions are based on the volume of traffic if the project is built compared with the scenario where it is not.

These predictions are fundamental to the need for the project. However, there is no detail that I could find in the EIS outlining how this traffic modelling was conducted and what metrics were used to calculate the predicted future volumes.

Therefore, please could you clarify how this data was modelled providing as much detail as possible. In particular I would like to know if the following facts and scenarios were taken into consideration?

The increase in the use of autonomous vehicles in the near to medium term. It is well documented that "self-driving cars" are predicted to use road space much more efficiently and will also require less parking spaces hence freeing up more road space on arterial highways. Improved public transport options. In particular an increase in the frequency of bus service routes and dedicated bus lanes. The increased propensity for current commuters to work remotely and hence decrease the number of single occupant car users. The possibility of introducing vehicle congestion charging. CBD congestion charging has worked successfully in other major cities resulting in reduced traffic volumes through those urban areas. Impact on ANZAC Bridge East Bound Traffic. The EIS mentions that congestion is likely to increase on the east bound carriageways on the ANZAC bridge but does not provide any solution.

Has the possibility of a dedicated bus lane on the east bound side of the bridge been considered? Since WestConnex will now dump thousands of vehicles on the bridge in the morning rush hour that are currently filtered by numerous sets of lights on the City West Link and Victoria Road the bridge is highly likely to become filled with the same traffic that is currently attempting to enter the CBD but with the same limited flow through the city due to traffic lights on the western side of the CBD. A dedicated AM bus lane would at least prioritise public transport users above single occupant car use.

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 objections I have raised.

Yours sincerely, [REDACTED]

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**From:** [REDACTED] <campaigns@good.do>  
**Sent:** Monday, 16 October 2017 8:39 AM  
**To:** DPE CSE Information Planning Mailbox  
**Subject:** Submission to WestConnex New M4/M5 EIS, project number SSI 16\_7485 re pathogen spread

Attn: Secretary, re: WestConnex M4/M5 EIS, Project Number SSI 16\_7485 re pathogen spread

**SUBMISSION OF OBJECTION TO WESTCONNEX M4/M5 LINK EIS.**

I am writing in response to the above EIS. I have examined the EIS and I know the area well. I wish to object to the proposed project based on the Pathogen spread caused by the movement of construction vehicles, equipment and people.

The presence of the plant pathogen, *Phytophthora Cinnamomi*, within the study area is unknown, however, I strongly believe that there is no presence of the pathogen in the study area. Given that the construction vehicles removing spoil will be coming in to contact with the pathogen when depositing the spoil and returning, there is a high probability that the pathogen will be transported back to the study area. The pathogen is highly noxious and spreadable, thus, I do not believe there are adequate measures stated in the EIS to mitigate the risk of spreading the pathogen to the study area. At present the study area does not display any signs of dieback by the root rot fungus. My concern is that as has been seen in similar projects that have not had the appropriate measures in place, the pathogen has spread to areas which have not previously been infected. I do not want the pathogen to be spread to plants of the family Myrtaceae in the study area.

I would like to speak to / have my objection responded to by the expert that has assessed the environmental impact of the proposed project as I believe the study has not taken in to consideration the devastatingly detrimental impact that the introduction of *Phytophthora Cinnamomi*.

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 objections I have raised.

Yours sincerely, [REDACTED]

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**From:** [REDACTED] <campaigns@good.do>  
**Sent:** Monday, 16 October 2017 8:47 AM  
**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.

# SUBMISSION OF OBJECTION TO WESTCONNEX M4/M5 LINK EIS.

I am writing to make a submission on the incompleteness of the EIS. As demonstrated below there are a number of points that have not been adequately addressed.

The wrong traffic modelling approach has been used: • All traffic modelling is wrong, the question is: by how much? And what are the implications of the error?

- Incorrect traffic modelling has led to overoptimistic traffic predictions which resulted in low toll revenue from of the Cross City Tunnel, Lane Cove Tunnel and Brisconnex in Brisbane, resulting in eventual bankruptcy.

- The traffic modelling process used to develop the Project is fundamentally flawed because: – Traffic projections are likely to be significantly different to the actual traffic on the street network

- Traffic volumes projected in the model are in numerous instances well above the physical capacity of the road network.

- There is no statement on the level of accuracy and reliability of the traffic modelling process. This is a major shortcoming and is contrary to the Secretary's Environmental Assessments Requirements.

- Westconnex traffic modelling relies on implausible traffic volumes that exceed the capacity of the road links and intersections at several key locations.

Yours sincerely, [REDACTED]

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**From:** [REDACTED] <campaigns@good.do>  
**Sent:** Monday, 16 October 2017 8:45 AM  
**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.

#### SUBMISSION OF OBJECTION TO WESTCONNEX M4/M5 LINK EIS.

I am writing to make a submission on the incompleteness of the EIS. As demonstrated below there are a number of points that have not been adequately addressed. • 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.

- 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 project objectives (Part 3.3 of EIS) include enabling the construction of motorways over the harbour and to the northern beaches. However, the traffic impacts of these motorways in Rozelle have not been assessed. These projects were not part of the business case that justified the WestConnex in the first place. This constant shifting of reasoning as to why the project is justified points to a desperation to find a reason to build it, rather than there being a clear need to be serviced.

I look forward to your response to my objection, 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 objections I have raised.

Yours sincerely, [REDACTED]

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**From:** [REDACTED] <campaigns@good.do>  
**Sent:** Sunday, 15 October 2017 1:42 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.

## SUBMISSION OF OBJECTION TO WESTCONNEX M4/M5 LINK EIS.

I strongly object to this proposal in its entirety that will severely impact the health of those near the stacks 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. NSW Planning must reject this EIS and instead recommend to the NSW government that there should be an independent review of WestConnex before more billions are spent and more residents' lives are damaged.

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. This means the community will have limited say in the management of the impacts identified in the EIS. The EIS needs to provide an opportunity for the community to meaningfully input into this report and approval conditions.

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.

The EIS states, there are at least 5 schools that will be in the orbit of these poisonous fumes. Children and the elderly are most at risk of lung ailments. The Education Minister Rob Stokes declared in 2017, that "No ventilation shafts will be built near any school." in his electorate. The same should be applied in all areas of Sydney and the government needs to urgently review its policy of support for unfiltered stacks.

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 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.

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 and also be greatly increased if Stage 3 were ever completed. It states that Stage 3 would 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. 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 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.

The EIS states, there are at least 5 schools that will be in the orbit of these poisonous fumes. Children and the elderly are most at risk of lung ailments. The Education Minister Rob Stokes declared in 2017, that "No ventilation shafts

will be built near any school.” in his electorate. The same should be applied in all areas of Sydney and the government needs to urgently review its policy of support for unfiltered stacks.

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 and anyone who have driven there knows, 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 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. 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. An EIS based on inaccurate traffic analysis cannot be approved.

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.

We are 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.

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.

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.

The Environmental Impact Statement for Stage 3 admits that the traffic around St Peters will be worse when both stages are completed. So the community would have to put up with the exhaust from tunnels and 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.

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.

During the Stage one consultation phase, residents were repeatedly told that after construction of the M4 East, there would be no more above ground construction in Haberfield. It now appears that they were misled. SMC is already preparing its Preferred Infrastructure Report which will include its final choice of option. I demand that this report be made public as soon as it is filed with NSW Planning and that residents be given a right to consultation on the actual plan before a determination on this EIS application is made by NSW Planning.

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 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 even notified of feedback sessions. 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'.

SMC was required to consider alternatives. This section in the EIS is tokenistic at best. The City of Sydney came up with a well thought out alternative plan and this has been ignored in the EIS.

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 objections I have raised.

Yours sincerely, [REDACTED]

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**From:** [REDACTED]<campaigns@good.do>  
**Sent:** Sunday, 15 October 2017 12:42 PM  
**To:** DPE CSE Information Planning Mailbox  
**Subject:** Submission to WestConnex New M4/M5 EIS, project number SSI 16\_7485

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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.

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Yours sincerely, [REDACTED]

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Please reply to [REDACTED]

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**From:** [REDACTED] <campaigns@good.do>  
**Sent:** Sunday, 15 October 2017 7:57 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.

## SUBMISSION OF OBJECTION TO WESTCONNEX M4/M5 LINK EIS.

I strongly object to this proposal in its entirety 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. NSW Planning must reject this EIS and instead recommend to the NSW government that there should be an independent review of WestConnex before more billions are spent and more residents' lives are damaged.

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. This means the community will have limited say in the management of the impacts identified in the EIS. The EIS needs to provide an opportunity for the community to meaningfully input into this report and approval conditions .

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This is negligent when you consider that the World Health Organisation in 2012 declared diesel particulates carcinogenic.

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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.

We are 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.

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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.

The Environmental Impact Statement for Stage 3 admits that the traffic around St Peters will be worse when both stages are completed. So the community would have to put up with the exhaust from tunnels and 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.

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.

During the Stage one consultation phase, residents were repeatedly told that after construction of the M4 East, there would be no more above ground construction in Haberfield. It now appears that they were misled. SMC is already preparing its Preferred Infrastructure Report which will include its final choice of option. I demand that this report be made public as soon as it is filed with NSW Planning and that residents be given a right to consultation on the actual plan before a determination on this EIS application is made by NSW Planning.

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 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 even notified of feedback sessions. 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'.

SMC was required to consider alternatives. This section in the EIS is tokenistic at best. The City of Sydney came up with a well thought out alternative plan and this has been ignored in the EIS.

I object to the fact that the stage 3 tunnel makes a big unnecessary arc through Haberfield, Leichhardt, Annandale & Camperdown to reach St Peters due to the Anzac Bridge and Victoria Rd access when Parramatta Rd is available and a tunnel from Rozelle to a Parramatta road option would affect less people.

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 objections I have raised.

Yours sincerely, [REDACTED]

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

**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:**

- |   |   |
|---|---|
| <p>A. Experience has shown that construction and other plans by WestCONnex are often regarded as flexible instruments. Any action to remedy breaches depends on residents complaining and Planning staff having resources to follow up which is often not the case. I find it unacceptable that the EIS is written in a way that simply ignores problems with other stages of WestCONnex.</p>   | <p>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.</p> |
| <p>B. Why are two different options being suggested for Haberfield? It is clear that both of these are unacceptable and will expose residents to unnecessary traffic danger, congestion and disruption with capacity to enjoy their homes and environment. It is insulting that the EIS acknowledges this but offers not solution other than to go ahead.</p>   | <p>E. 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.</p>  |
| <p>C. 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.</p> | <p>F. It is outrageous to suggest that four unfiltered stacks would be built in one area, Rozelle</p>   |
| <p>D. 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</p>  | <p>G. Rather than adding to pollution, the NSW government should be seeking ways to reduce emissions. It is not acceptable to argue that worsening pollution is not a problem simply because it is already bad.</p>   |
|   | <p>H. 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.</p>  |



**From:** [REDACTED] <campaigns@good.do>  
**Sent:** Sunday, 15 October 2017 3:06 PM  
**To:** DPE CSE Information Planning Mailbox  
**Subject:** Submission to WestConnex New M4/M5 EIS, project number SSI 16\_7485

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**Sent:** Sunday, 15 October 2017 8:28 PM  
**To:** DPE CSE Information Planning Mailbox  
**Subject:** Submission to WestConnex New M4/M5 EIS, project number SSI 16\_7485

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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.

The Environmental Impact Statement for Stage 3 admits that the traffic around St Peters will be worse when both stages are completed. So the community would have to put up with the exhaust from tunnels and 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.

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.

During the Stage one consultation phase, residents were repeatedly told that after construction of the M4 East, there would be no more above ground construction in Haberfield. It now appears that they were misled. SMC is already preparing its Preferred Infrastructure Report which will include its final choice of option. I demand that this report be made public as soon as it is filed with NSW Planning and that residents be given a right to consultation on the actual plan before a determination on this EIS application is made by NSW Planning.

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 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 even notified of feedback sessions. 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'.

SMC was required to consider alternatives. This section in the EIS is tokenistic at best. The City of Sydney came up with a well thought out alternative plan and this has been ignored in the EIS.

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 objections I have raised.

Yours sincerely, [REDACTED]

[REDACTED] This email was sent by [REDACTED] 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 [REDACTED] provided an email address [REDACTED] which we included in the REPLY-TO field.

Please reply to [REDACTED]

To learn more about Do Gooder visit [www.dogooder.co](http://www.dogooder.co) To learn more about web protocol FC 3834 visit: [www.rfc-base.org/rfc-3834.html](http://www.rfc-base.org/rfc-3834.html)

**From:** [REDACTED] <campaigns@good.do>  
**Sent:** Sunday, 15 October 2017 8:21 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.

## SUBMISSION OF OBJECTION TO WESTCONNEX M4/M5 LINK EIS.

I strongly object to this proposal in its entirety 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. NSW Planning must reject this EIS and instead recommend to the NSW government that there should be an independent review of WestConnex before more billions are spent and more residents' lives are damaged.

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. This means the community will have limited say in the management of the impacts identified in the EIS. The EIS needs to provide an opportunity for the community to meaningfully input into this report and approval conditions.

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.

The EIS states, there are at least 5 schools that will be in the orbit of these poisonous fumes. Children and the elderly are most at risk of lung ailments. The Education Minister Rob Stokes declared in 2017, that "No ventilation shafts will be built near any school." in his electorate. The same should be applied in all areas of Sydney and the government needs to urgently review its policy of support for unfiltered stacks.

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 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.

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 and also be greatly increased if Stage 3 were ever completed. It states that Stage 3 would 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. 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 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.

The EIS states, there are at least 5 schools that will be in the orbit of these poisonous fumes. Children and the elderly are most at risk of lung ailments. The Education Minister Rob Stokes declared in 2017, that "No ventilation shafts

will be built near any school.” in his electorate. The same should be applied in all areas of Sydney and the government needs to urgently review its policy of support for unfiltered stacks.

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 and anyone who have driven there knows, 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 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. 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. An EIS based on inaccurate traffic analysis cannot be approved.

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.

We are 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.

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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.

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SMC was required to consider alternatives. This section in the EIS is tokenistic at best. The City of Sydney came up with a well thought out alternative plan and this has been ignored in the EIS.

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 objections I have raised.

The entire process has been poorly constructed and has left me feeling that there is NO opportunity for community grievances to be heard. The EIS must be audited by an independent group and the health and well-being of the community must be a priority.

Yours sincerely, [REDACTED]

\_\_\_\_\_ This email was sent by [REDACTED] 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](mailto:campaigns@good.do), however [REDACTED] provided an email address [REDACTED] which we included in the REPLY-TO field.

Please reply to [REDACTED]

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## **Submission to WestConnex New M4/M5 EIS (Stage 3), project number SSI 16 7485**

### **Introduction**

This EIS is based on the fallacy that the M4-M5 routes need linking when they are already linked by the M7, A6 and A3. The M4-M5 "Link" enables the expansion of the WestConnex network to include the Western Harbour Tunnel, Northern Beaches Link and the F6. These motorway projects were never part of the WestConnex Business Case and are not priority projects in any State or Federal roads plans.

The EIS for Stage 3 is a strategy-only document. It is "indicative" so does not commit to a particular design and therefore does not address any local impacts created by the proposed M4-M5 "Link". Being "indicative only", it therefore can be changed at the whim of the various contractors without further reference to the communities affected by it. Further, we are informed that the Berejiklian Government intends to privatise Sydney Motorway Corporation in the foreseeable future, thereby rendering even the current slender scrutiny of this disastrous project by the general public almost impossible.

The EIS for Stage 3 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 that will be taken into serious consideration. It does not provide a complete and transparent account of what is proposed. It is a "tick-a-box" exercise only.

### **I OBJECT TO THIS EIS.**

#### **The process: lack of transparency**

The entire WestConnex project, including Stage 3, has been marked by opacity and obfuscation. The 7,000 + pages of the current EIS document contain vague information on various elements of the project and few generally informative or reliable details. They reflect the general tenor of the so-called community information sessions held prior to the EIS being published (although it is my understanding the EIS was almost all completed even before most of the information sessions for Stage 3 were held).

Public consultation cannot possibly be genuine and a two-way process when so much is hidden from the public and so much is uncertain.

#### **Following are examples of the EIS to which I object:**

##### **1. Failure to meet stated strategic objectives**

The Stage 3 EIS has failed to provide evidence that WestConnex will meet its primary objectives of providing a direct motorway connection between Western Sydney and Sydney Airport and Port Botany.

##### **2. Accountability handed to an unknown private operator**

I am completely opposed to privatisation being pursued by the NSW Berejiklian Government. Stage 3 has not been approved. Other tollway projects, which are included as part of the justification for this project, do not even have a business case. Approval by the NSW Department of Planning is meant to

be a way of safeguarding communities but once the project is sold, the State Government will no longer carry responsibility for the project. There has already been a huge problem with breaches of conditions on Stages 1 and 2. It is frightening for residents to imagine what it will be like if so much power over their lives is granted to (what is likely to be) a transnational consortium.

### **3. Lack of consideration of alternatives**

Under the Secretary's requirements, the EIS is supposed to provide an analysis of alternatives, including potential public transport alternatives (*SEARS 2 (e)*). The EIS fails to meet this requirement. There is a broad claim for the need for the project without any detailed analysis of what other solutions (including the one developed by the City of Sydney) could be pursued. Given the billions of dollars involved in this project, a **detailed analysis** of potential alternatives is essential and should be required.

### **4. Long-lasting inequitable impacts ignored in EIS**

The project will increase intergenerational equity by failing to provide public transport alternatives, embedding car dependency in areas of Sydney that are not adequately served with public transport and discriminating against those who cannot afford to pay tolls. People will be forced to choose between spending an increasing proportion of income on tolls or travelling on slower congested routes.

The EIS acknowledges that the project would have a legacy of traffic congestion which means that whole communities would not only have had their quality of life severely impacted upon by construction for up to eight years, but those same communities would be left with the health impacts of traffic congestion.

### **5. Noise and disruption**

As has been the situation with the M4 East and New M5, general construction conditions nearly always allow discretion and in practice are of little use to residents who are subjected to invasive noise at night that disrupts the peace - and sleep - and consequently damages health, both physical and mental. For example, normal work hours are generally meant to be applied but can be varied on application. As residents have found on the King Georges Interchange, M4 widening, M4 East and New M5 projects, contractors often do not bother to notify residents when they are breaching normal work hours.

### **6. Noise and air quality studies**

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. 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.<sup>1</sup> An EIS based on inaccurate traffic analysis *cannot* be approved.

### **7. Economic basis for the project**

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<sup>1</sup> <http://www.smh.com.au/nsw/pressure-builds-on-state-government-to-sweeten-westconnex-sale-20171005-gyur5w.html>

The economic basis for this project is the approval of further toll roads. Throughout the EIS there are references to the F6 and Northern Beaches Link, thereby creating the notion that they will be built. The impacts set out in the EIS rely on the assumption that if the links are built, traffic will lessen once they are. However, there is *no certainty* these links will be built.

Any references to these extra toll roads, in the context of impacts from this project, need therefore to be disregarded.

#### **8. Overlap in construction impacts**

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 and polluted air.

#### **9. Costs not taken into account mean benefits are overstated**

The EIS relies on the WestConnex Business Case. This means that many of the errors in the Business Case are repeated in the EIS. In assessing the social and economic impacts, the EIS for Stage 3 fails to take account of many of the costs including:

- cost of the reductions in public transport, especially the loss of fare revenue;
- loss of heritage to the *whole* community (not just property owners); and
- road widening that is made necessary by traffic congestion, exacerbated by WestConnex.

I am one of very many in the wider community who considers that the NSW Government is currently falsely claiming the costs of WestConnex to be \$16.8 billion while it moves towards privatisation. The total costs are likely to be closer to the City of Sydney's estimate of \$45 billion when a range of other factors are taken into consideration – such as road upgrades for every exit and entrance, property acquisitions, cost overruns, repairs, and so on.

#### **10. Land use changes not adequately modelled**

There is no analysis of how inadequate land use forecasts for Stages 1 and 2 impact on the cumulative impacts of the project. The EIS notes that the project design and land use forecasts have changed significantly since the Stage 1 and Stage 2 EISs. However the cumulative analysis does not quantify the expected change on those roads. The EIS only notes significant increases in traffic volumes.

#### **11. Removal of the rail lines in Rozelle Rail Yards**

I object to these rail lines being removed when they could have been kept and rehabilitated as the corridor for a light rail system to White Bay and Balmain. I regard this removal – apparently for three (3) unfiltered emissions smoke stacks – as an act of deliberate vandalism.

## Summary

The EIS is a strategy-only document. It lacks a proper rationale. It does not *commit* to any design and therefore does not address any local impacts created by the proposed M4-M5 Link. Instead, it prepares the pathway for the sale of the Sydney Motorways Corporation to the private sector. If this privatisation goes ahead, the new owners and its contracting companies will be handed the responsibility for overseeing and controlling the final design, cost and implementation of the M4-M5 "Link".

Furthermore, if Stage 3 proceeds (in whatever form), the people of the affected Inner West suburbs – and indeed suburbs across Sydney - will have a highly destructive, intrusive tollway that escalating tolls will make extremely unpopular, and therefore will be avoided wherever possible. In turn, this will inevitably create traffic congestion in smaller, local streets and concomitant pollution affecting the atmosphere and people's health.

This is a TOTALLY UNACCEPTABLE prospect for residents – those who have already experienced the terrible impacts on their communities of Stages 1 and 2, and those who would be affected for the first time.

## Conclusion

On the basis of the information I have absorbed, I conclude that Stage 3 (and indeed the entire WestConnex project ) is a sham in its concept and rollout thus far. If ever completed, it will bankrupt this State. Ordinary people with no political/developer/roads lobby connections will be severely impacted upon by this project. Worse, it will not provide any real benefit to drivers. It will ruin amenity and drive wedges through many Inner West communities. Further, it will exacerbate the effects of global warming through vehicle emissions and use of vast quantities of concrete, inter alia.

## I object to the EIS for Stage 3.

### Recommendations

#### (i) Independent assessment is needed

The NSW Berejiklian Government wants approval of the EIS to be a foregone conclusion. I request NSW Department of Planning staff to approach the issues as planning *professionals* and not be pressured by NSW politicians. Despite the Critical Infrastructure provisions that rule out legal appeals and hearings, there is no legal impediment to this assessment process being a *genuine* one.

The NSW Department of Planning must not ignore City of Sydney and independent experts, and should investigate their views thoroughly during the assessment process. They should also examine the many submissions provided by individual community members and experts in various fields.

#### (ii) Preferred Infrastructure Report must be published

I understand that the Sydney Motorway Corporation is already preparing a report with its preferred construction options. This *must* be published and members of the public allowed a genuine opportunity to provide feedback on this report.

As the M4-M5 Link (Stage 3) lacks a proper rationale, the NSW Department of Planning must NOT approve this project.

I call on the Secretary of NSW Department of Planning to advise the Minister to reject this entire EIS and re-write it prior to any further work on the other sections of WestConnex continuing, taking into account changes to the Business Case, changes to the proposed route and the most recently announced transfer of the Rozelle Junction into a separate project.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**14 October 2017**

***Declaration: I have not made any reportable donations in the last two years.***

**From:** [REDACTED]  
**Sent:** Mon, 16 Oct 2017 11:40:15 +0000  
**To:** [REDACTED]  
**Subject:** FW: Submission Details for company WestCONnex Action Group (org\_object)  
**Attachments:** 228361\_WestCONnex Action Group\_ Submission on WestConnex M4-M5 Link EIS, project number SSI 16\_7485\_2017Oct16\_2233.pdf

**From:** system@accelo.com On Behalf Of Janet Dandy-Ward  
**Sent:** Monday, 16 October 2017 10:34:23 PM (UTC+10:00) Canberra, Melbourne, Sydney  
**To:** [REDACTED]  
**Subject:** Submission Details for company WestCONnex Action Group (org\_object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Janet Dandy-Ward  
 Organisation: WestCONnex Action Group (Steering Committee)  
 Govt. Agency: No  
 [REDACTED]

Address:

[REDACTED]

St Peters, NSW  
 2044

Content:  
 WestCONnex Action Group objects to the M4-M5 Link EIS for the reasons specified in the attached submission.

[REDACTED]  
 Submission: Online Submission from company WestCONnex Action Group (org\_object)  
[https://majorprojects.accelo.com/?action=view\\_activity&id=228361](https://majorprojects.accelo.com/?action=view_activity&id=228361)

Submission for Job: #7485 WestConnex M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)



## **Submission to WestConnex M4/M5 Link EIS, project number SSI 16\_7485**

This document contains the formal submission made by WestCONNEX Action Group Incorporated (WAG) to the WestConnex M4/M5 Link environmental impact statement (EIS).

WAG is a community group made up of residents from across western, inner and south-west Sydney. We are not affiliated with any political party.

WAG strongly objects to the M4/M5 Link project based on the information contained in this EIS, and to the WestConnex proposal as a whole. We ask the Minister for Planning to reject this proposal.

We have a huge number of objections to the project but also to the approach taken in the EIS itself. We agree with the City of Sydney that the inadequacy of the M4/M5 Link EIS is “so profound” that should not be used as a basis for a Ministerial determination to approve the project. The EIS as a whole should be rejected.

WestConnex as proposed is the wrong solution at the wrong time for Sydney. It is out of step with international best practice when it comes to transport policy and the creating liveable, economically viable cities in the 21st century.

Experience and research from independent experts here in Australia and overseas has shown that these kinds of toll road mega-projects are hugely expensive and do not ease congestion over the long term. If anything, such projects make congestion worse by increasing overall traffic volumes as the new road capacity quickly fills up. WAG has yet to hear of an independent transport expert who backs the project. Even the EISs produced for the various previous stages of WestConnex show it is not a long-term solution to Sydney's congestion problem, and as such does not meet its stated objectives.

In addition, WestConnex will divert billions of dollars of NSW and Federal taxpayer money into a tollway that only 1% of people in NSW will use. If its huge and rapidly escalating \$17 billion cost was invested in more sustainable transport options instead - such as public transport improvements in western and south-west Sydney, better management of Sydney's existing roads, and so on - it would not only be likely to reduce congestion and improve mobility in our capital. It would also free up much-needed public funds for improving roads, public transport, schools and hospitals in regional NSW. Spending it on a tollway that so few people will use is both wasteful and deeply unfair.

The strategic justification for the M4/M5 Link is weak and inconsistent with the NSW Government's strategic planning and policy framework, despite its inclusion in the 2012 State Infrastructure Strategy and the Long Term Transport Master Plan. The project as proposed in this Environmental Impact Statement (EIS) does not deliver the broader objectives of WestConnex as stated in the Updated Strategic Business Case (November 2015).





This EIS and the Updated Strategic Business Case for WestConnex are clear that the benefits accruing from Stage 3 do not outweigh the costs. Benefits are shown to come once the whole WestConnex project is built according to the Updated Strategic Business Case, and that the stated benefits will not now be delivered unless further tollways are built, such as the proposed Western Harbour Tunnel and the Sydney Gateway, making it even more likely that this project will provide disbenefits to society if it proceeds as proposed in this EIS, i.e. as a standalone project. This is particularly concerning given there is a significant risk that these other necessary extensions will not be built.

This EIS is of a very low standard and fails to provide meaningful evaluation and assessment of the WestConnex M4/M5 Link. Instead, the document reads like an advertisement for the M4/M5 Link and associated road works, rather than as a critical examination of the environmental impacts of the project. Parts of the proposed project are described only with subjective, conditional language such as "where feasible", while not providing any meaningful detail, and implying no requirement to meet objective standards. Some results are provided in context, whilst others are provided as numbers without a context, and yet others are essentially lists of things that have not yet been surveyed or planned. As such, we contend that the project has not had a meaningful EIS conducted or published.

The EIS lacks rigour and sound analysis, despite the huge volume of documentation. This lack of rigour and analysis is consistent across all chapters and appendices. The project objectives are biased towards a motorway solution, so that any proposed alternative falls short of the proposed solution. Similarly, the work undertaken in the EIS is highly compliance driven, and fails to take into account opportunities or strategic impacts, and the assessment of cumulative impacts, now of great concern, is almost negligent.

WestConnex is presented as a 'transformational' infrastructure project, however, the EIS is not clear on what transformation it will achieve. There is no demonstration that WestConnex delivers transformation in terms of social or economic improvement, or better land use outcomes. To the contrary, WestConnex will deliver a piece of infrastructure that increases traffic on local roads, does not enable value capture or urban renewal, and is not consistent with the government's land use priorities or the proposal in the 2012 State Infrastructure Strategy.

The M4-M5 Link stage project has only been assessed to 2033, which does not take into account the 40+ year concession period for the asset as stated in the WestConnex Updated Strategic Business Case. The assessment does not account for future events that may radically change travel demands or behaviours.

The evidence provided by the EIS in support of the project is incomplete and unbalanced, selectively including and excluding impacts from subsequent planned stages of the WestConnex project. The analysis of strategic alternatives in the EIS is cursory and fails to demonstrate the M4/M5 Link is the best option to meet the needs of a growing Sydney population. The EIS also does not take into consideration the travel patterns of residents and businesses in western or south-western Sydney that WestConnex is intended to serve, nor the wider impacts on inner-Sydney communities affected by the WestConnex project.





The statement that the M4/M5 Link project is an integrated transport project is false and misleading. It is a motorway that does not provide for improved public transport connections and has not fully considered the active transport component in line with government policy. The government could have delivered a better outcome by focusing on ways to “improve access” that is modally agnostic and more consistent with the government’s land use policies.

We recognise there is pressure on several NSW Departments, including Planning and the Environment, to approve this project, particularly as work has commenced on Stages 1 and 2. We remind public servants of their obligation to the public and to the potential social, health and economic costs of spending \$17 billion on WestConnex when it provides no solution to Sydney’s transport needs.

In order to make this submission, WAG has consulted with and/or reviewed evidence provided by a wide range of experts, including transport planners, environmental organisations, scientists, transport economists, local councils, medical professionals, social workers, investigative journalists, and more. Combined with our own primary research and review of the EIS, this leads us to not only strongly object to the proposal as a whole, but to raise many specific objections in regards to many areas of this EIS.

As ordinary citizens, what really disturbs us is that we have encountered so much serious independent and academic opinion and research that runs counter assertions in the EIS, yet none of this is engaged with or reflected in the EIS. Similarly we noted that in the Response to Submissions to the Stages 1 and 2 EIS’s, there was no engagement with critical analysis.

WAG asks that the Department rejects this proposal on the basis of this EIS. We expect a detailed response to each of the objections we have raised in this submission, and that you will publish this submission in accordance with the undertaking on your website.

Please send your acknowledgement of this submission and your response to our objections to us at: [info@westconnexactiongroup.org.au](mailto:info@westconnexactiongroup.org.au)

Janet Dandy-Ward  
WestCONnex Action Group  
16 October 2017





## 1. Failure to meet Business Case, Objectives & SEARs requirements

### 1.1 Failure to meet stated strategic objectives

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

The objectives have no associated targets by which their achievement can be ever be determined. Objectives/targets need to be specific, measurable, achievable, relevant and time-bound, and each of the project's objectives fails on one or more of these measures.

Even though the objectives have been contrived to fit the project, the project still fails to meet them.

The planned route for the WestConnex does not connect to Sydney Airport or Port Botany. The EIS does not provide evidence that economic growth can be assisted by increased motor traffic to the CBD.

There are serious flaws in the proponent's traffic modelling. If WestConnex leads to more traffic congestion in the inner west, parts of south-west Sydney and routes into the CBD as most independent experts and even this EIS admits it will, the project will not improve access to businesses. Congestion and traffic will only worsen, not just on the WestConnex network, but on the surrounding road network.

Should Badgery's Creek airport be built, the emphasis on Sydney Airport is likely to be misplaced, as this hub is likely to act as a more appropriate international gateway for many air freight movements given its proximity to western Sydney freight facilities, as well as western Sydney residents.

There are better ways of spending \$17 billion that would deliver greater long-term economic growth, including:

- improved road and rail access to Port Botany
- improved public transport between Western Sydney and Sydney's various CBDs
- improving ring roads in Western Sydney
- supporting and developing businesses in Western Sydney

There is already an extensive road and motorway network linking Sydney's international gateways (Sydney Airport and Port Botany), Western Sydney and places of business across the city. The operation of this network could be improved significantly with demand management such as road pricing reform. There is no need for costly and destructive new motorways.

The most efficient and economic way to link large trip generators is with mass transit. A single motorway lane can transport only 2000 passengers per hour, under ideal conditions. A single railway line can transport 20,000 passengers per hour.





The improvements in congestion claimed for the project arise from measures that can be separated from the rest of the project – namely the charging of tolls for using the M5 East and New M5. Absent congestion charging, or similar, the laws of induced traffic means that increasing road capacity increases traffic volumes; it does not reduce congestion over the long term, if at all.

Charging for the M4 Widened section, the existing M5 and WestConnex stages without congestion charging on alternate routes will increase, not reduce, congestion on those routes. Many intersections will remain at the lowest Level of Service (F) even if the project, including the M4-M5 Link, is built.

Claims by WestConnex that the project will improve speed and reliability depend on the reliability of its approach to traffic modelling, which experts argue are flawed.

There is no evidence that increasing road capacity and building urban motorways can relieve road congestion in the long term, because the added capacity simply induces more demand. Business case does not justify moving to this EIS.

SGS Economics and Planning was commissioned by the City of Sydney to undertake an analysis of the Updated Business Case, which the NSW government reluctantly released in late 2015. SGS found that the Business case found a Benefit Cost Ratio (BCR) as 1.71 when it should have been 1.64. The construction costs appear too conservative – if these were to increase, the BCR would reduce accordingly. (This is particularly relevant to Stage 3 because the construction costs of the Rozelle Interchange would be huge because of the design and technical challenges of building overlapping tunnels underground. Also the Sydney Gateway was originally part of the project but has now been moved out of WestConnex.)

Modelling for post-2033 conditions was not undertaken, however benefits were assumed to continue until 2050+. The Business Case did not reflect global approaches to congestion management, such as mass 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 were a key component of the positive BCR. A significant number of these supposed benefits that were supposed to arise from travel time savings were within the margin of error of modelling, or were so small that motorists might not notice them (and therefore would not value them).

In fact as a result of considering these and other factors, SGS consulting found 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.

Costs not taken into account meaning benefits are overstated.

The EIS relies on the WestConnex business case. This means that many of the errors in the business case are repeated in the EIS. In assessing the social and economic impacts, the EIS for Stage 3 fails to account of many of the costs including:





- Cost of the reductions in public transport, especially the loss of fare revenue;
- Loss of heritage to the whole community (not just property owners);
- Road widening that is made necessary by traffic congestion exacerbated by WestConnex;
- Outdoor air pollution costs in health.

WAG considers that the NSW government is currently falsely holding the costs of WestConnex to \$17 billion while it moves towards privatisation. The total costs are likely to be closer to the City of Sydney's estimate of \$45 billion. It is very likely that the true BCR of WestConnex would be less than 1:1. It is not acceptable for NSW Planning to exclude this important point from its assessment because these cost benefit assumptions are clearly built into the EIS including the Social and Economic Impacts study.

## **1.2 Failure to properly consider all relevant factors**

### **1.2.1 Overlap in Construction Impacts**

There are overlaps in the construction periods of the New M5 and M4 with stage 3, the M4-M5 Link, of some years. 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.

### **1.2.2 Failure to consider alternatives**

Under the Secretary's requirements, the EIS should provide an analysis of alternatives, including potential public transport alternatives. (SEARS 2 (e)). The EIS fails to meet this requirement. There is broad brush discussion about the need for the project without any detailed analysis of why other solutions including the one developed by the City of Sydney could not be pursued. Given the billions involved in this project, a detailed analysis of potential alternatives should be required. Long lasting inequitable impacts ignored in EIS.

The project will increase intergenerational equity by failing to provide public transport alternatives, embedding car dependency in areas of Sydney that are not adequately served with public transport and discriminating against those who cannot afford to pay tolls. People will be forced to choose between spending an increasing proportion of income on tolls or travelling on slower congested routes.

The EIS acknowledges that the project would have a legacy of traffic congestions which means that whole communities would not only have had their quality of life severely impacted by construction for up to eight years, but those same communities will be left with the adverse health impacts of traffic congestion.





### **1.2.3 Land Use changes not adequately modelled.**

No analysis of how inadequate land use forecasts for Stages One and Two impact on the cumulative impacts of the project. The EIS notes that the project design and land use forecasts have changed significantly since the Stage 1 and Stage 2 EIS. However the cumulative analysis does not quantify the expected change on those roads. The EIS only notes significant increases in traffic volumes.

## **2. Objections to lack of detail, transparency and proper process**

### **2.1 EIS should be rejected as it is 'Indicative only'**

The EIS is a strategy only document. It does not commit to any design and it therefore does not adequately address 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. If this privatisation goes ahead, the new owners and its contracting companies will be handed responsibility for oversight and control of the final design, and cost and implementation of the M4-M5 Link, without public input. For a project of this size and impact, this is not acceptable. Private owners will have no responsibility or accountability to the public for a Critical State Infrastructure.

This is a frightening prospect for residents who have already experienced or observed others experiencing the terrible impacts of the Stages 1 and 2.

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. 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 in project delivery. The additional effect of this is that the community and other stakeholders such as the local councils will be unable to undertake compliance activities as the conditions are simply too broad and lack any substantial detail.

EIS 6.1 (Synthesis, Page 45) describes the process for addressing project uncertainties. "The EIS is based on the concept design developed for the project. As such, it is to be expected that some uncertainties exist that will need to be resolved during detailed design and construction and





operational planning. As described in Chapter 1, construction contractors (for each stage of the project) would be engaged during detailed design to provide greater certainty on the exact locations of temporary and permanent facilities and infrastructure as well as the construction methodology to be adopted. 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". The EIS should not be approved till the bulk of these '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, see below). 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 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) are "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. For this reason alone, NSW Planning must not approve this project as it does not contain any certainty for residents as to what is proposed and therefore provides no proper basis on which the project can be approved.

As has been seen with the M4 East and New M5, the conditions of approval are insufficient and nearly always allow discretion and in practice have been of almost no use to residents who have been subjected to continuous night and weekend working, with horrific noise at night that damages health. Normal work hours are generally meant to be applied but can be varied on application or in the case of "emergency". As residents have found on the King Georges Rd Interchange, M4 widening, M4 East and New M5 projects, contractors often overrun notified working hours, and different agencies (Sydney Water, Ausgrid) doing work on the project do not co-ordinate out of hours working or notify residents when they are breaching normal work hours.

## **2.2 Accountability handed to unknown private operator**

We are completely opposed to the sale of SMC being pursued by the NSW government. Stage 3 has not been approved. Other tollway projects, which are included as part of the justification for this project, do not even have a business case. NSW Planning approval is meant to be a way of safeguarding communities but once the project is sold, the government will no longer carry responsibility for the project. There has already been a huge problem with breaches of conditions on Stages 1 and 2. It is frightening for residents to imagine what it will be like if so much power over their lives is granted to a transnational consortium.





### **2.3 Independent assessment is needed**

The NSW government in its announcements assumes the approval of the EIS is a foregone conclusion. WAG requests NSW Planning staff to approach the issues as planning professionals and not be bulldozed by NSW politicians. Despite the Critical Infrastructure provisions that rule out legal appeals and hearings, there is no legal impediment to this assessment process being a genuine one.

The NSW Planning department must not ignore City of Sydney and independent experts but should investigate their views thoroughly during the assessment process.

### **2.4 Lack of transparency**

Public consultation cannot be meaningful when so much is hidden from the public and so much is uncertain. WAG objects to the lack of transparency and proper process that has characterised the WestConnex project since its inception, and continues to do so with the M4-M5 Link.

Sydney Motorway Corporation (SMC) has consistently pleaded “commercial in confidence” in refusing to provide information to the public, journalists and even the NSW Upper House Tolls Inquiry. SMC is a private corporation not covered by GIPA requests. State Critical Infrastructure should not be shrouded in secrecy. This type of major project should see all stakeholders have full access to the accounts of the project before putting taxpayers’ money at risk. In this case, the NSW and Federal governments have placed billions of dollars of taxpayers’ money at risk on the project without giving the people who provided the funds access to this data. This is unacceptable.

These flaws are all the more serious given the Federal and NSW governments have called WestConnex the largest road infrastructure project in Australia’s history. For such a major piece of infrastructure it has had a relatively short period of review. It appears to have been ‘fast-tracked’ to bypass important evaluation steps aimed at providing assurance to government and the taxpayers that the project is the best solution.

### **2.5 Grossly inadequate timeframe for community submissions and public consultation**

Other projects much less complex and impactful than the M4-M5 Link EIS are allocated considerably more time to the EIS process than the time given to the WestConnex project EIS’s.

There was considerable public objection to the lack of time provided for public comment on the Stage 3 M4-M5 Link EIS, the most complex and difficult of the three stages of the WestConnex project. Even with our network of experts and actively involved individuals, WAG have found it difficult to compile this response in the allotted time. We cannot believe that ordinary residents, especially those compiling submissions on their own, would have been able to manage this process effectively in the time allowed.

Both the City of Sydney and Inner West Council specifically requested at least 90 days for public consultation. These requests were denied.





We also know that the Department of Planning & Environment was well aware of the depth community anger at the short period of time given for public review and submissions.

The failure to grant such an extension on the basis of such an obvious need can only be interpreted as an attempt to maintain the lack of transparency surrounding WestConnex, as well as an effort to avoid proper process by circumventing community input.

This time frame is grossly inadequate for a document of this length, and the size and complexity of the task involved in reviewing in excess of 7,000 pages. The fact that the timeframe granted to this project is longer than the statutory 30-day requirement is irrelevant given the size, scope, and socio-economic cost of this project. This is inadequate time for submissions and findings of EIS to be considered, summarised and incorporated.

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 principles have been flouted for the whole of Westconnex and particularly Stage 3. We agree with the Inner West Council that the NSW government's decision to release the WestConnex Stage 3 EIS just days after the end of the consultation period on the Concept Design "short-changed the inner west community." We would add that it shortchanges all of those who will depend on transport in Sydney in the future.

SMC have made it all but impossible 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. Monday and Wednesday: 10am to 7pm. Tuesday: 10am to 6pm. Thursday and Friday: 10am to 5pm. Saturday and Sunday: 11am to 4pm. This restricted access does NOT constitute open and fair community engagement.

The EIS at 7-21 states that Community update Newsletters were distributed to residents 'near the project footprint' in many suburbs. This statement is simply not correct. No such newsletters were received by residents in central and northern Newtown. SMC was made aware of this fact, but has not responded to verbal and written requests for audited confirmation of the addresses 'letterboxed'. This statement of community engagement should be rejected by the Department.

Much of the information provided in the EIS is just not accessible and decipherable to most people. The documents are only on display for 2 months. Residents who want to engage will have to read and understand an enormous amount of information in this period. Information which has been prepared multiple specialists from across different fields from engineering to environmental science





to computer programming. Doing this requires a significant amount of time, energy and knowledge. There are 123 files in the Environmental Impact Statement folder, which contain 30 chapters and 24 appendices, a total of over 7000 pages. It is totally unreasonable to expect people to process large parts of this information within the time limits provided.

Communities around Sydney have banded together and pulled resources together to understand the EIS, but this has been a difficult process and the consultants who prepared the documents are not available to explain their work. While we (WAG) are certainly not arguing for a dumping down of the information or a cutting out of any details, this process is not really a consultation. In order to legitimately consult a significant number of people on much of the information provided in the EIS you need to make sure the assumptions and data analysis in the documents are clearly explained and accessible to most people. There is just absolutely no equal playing field between the bureaucrats, politicians, technical experts and corporate interests that lie behind the project and that have formulated the EIS, and those of us who are affected by the environmental and social damage it is doing.

## **2.6 Breach of WCAG 2.0 publication standards and Disability Discrimination Act**

The Department's failure to provide these submissions in an alternative format is clearly a breach of the government's own standards. All Australian, state and territory government websites are expected conform to Web Content Accessibility Guidelines (WCAG) 2.0 AA standards. It also places the Department in potential breach of the NSW Anti-Discrimination Act as well as the federal Disability Discrimination Act.

## **2.7 NSW Auditor General's Performance Audit**

NSW Auditor General's Performance Audit of WestConnex conducted in 2014 highlighted the importance of proper evaluation and identified some serious deficiencies in the development of the WestConnex project.

The Executive Summary of this audit concluded:

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

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

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

"The WestConnex project offers several lessons. While good internal controls are critical, they are not a substitute for externally managed Gateway reviews. Steering committees and boards cannot be responsible for both project delivery and independent assurance and reporting to the





Government. Responsibility for commissioning should be clearly differentiated from the responsibility for project delivery. Challenging deadlines heighten the need for good assurance but, paradoxically, also the risk of departure from best practice.” (p.3-4)

“The Government approved a new Major Projects Assurance Framework in December 2011...

“The objective of the Framework is to increase the Government’s confidence and assurance in planning and implementation of major projects through their entire lifecycle, specifically:

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

“A key component of the Major Projects Assurance Framework is the Gateway review system. The Gateway system is a series of structured reviews at key decision points (gates) in a project’s lifecycle. Gateway gives the Government a level of independent assurance on:

- whether an investment in a project is warranted
- the strategic options considered
- the agency’s capacity to manage and deliver the project on time, on budget and achieve desired project outcomes
- whether a project is on track and ready to move to the next phase.”(p.10-11)

WAG agrees with this assessment and it forms part of our objection to the M4-M5 Link and WestConnex as a whole. Failure to abide by the Major Projects Assurance Framework and employ best practice governance from project inception has greatly reduced community confidence in the WestConnex project. In the case of the M4-M5 Link EIS, the community is being asked to comment on an EIS that is deficient in detail and analysis of project justification.

A project of this size and impact should adhere to the NSW Government’s Major Projects Assurance Framework. Vital gateway reviews should have been undertaken before the preparation of the EIS (and certainly before awarding construction contracts). They should be commissioned, completed and made publicly available now, before any further approvals are issued.

The NSW Auditor-General also called the assessment of the WestConnex project concept into serious question. The following quotes are taken directly from its Audit:

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

“The Major Projects Assurance Framework introduced a Gate Zero to provide assurance that projects are well justified after considering a wide range of options. A Gateway review or similar should therefore be conducted early in a project’s life cycle to provide assurance around whether:





- the need for a project is properly defined
- there is justification for addressing that need
- the best value means of servicing that need are being proposed after considering a broad range of alternatives and their associated costs and benefits.

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

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

“We saw no evidence that:

- the Government specifically exempted WestConnex from the Major Projects Assurance Framework Gate Zero
- provided an explanation or justification for the variation from the Major Projects Assurance Framework
- the alternative approach adopted was assessed as being equivalent to, or better than, the Major Projects Assurance Framework.

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

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

The Department of Planning has been well aware of these criticisms, and has still seen fit to permit the proponent to submit an indicative design for public comments, and to only allow a 60 day public consultation period. WAG objects to both strenuously.

The NSW Auditor General is so concerned about the failure of proper process that it has this week announced a second inquiry into WestConnex.





### 3. Impact on Specific Suburbs

#### 3.1 Haberfield/Ashfield

This submission is directly informed by, and draws on the experiences of people living within the M4 East Haberfield and Ashfield destruction and construction triangle (Wattle St Interchange and Parramatta Rd interchange).

WAG demands that instead of sidestepping the actual experience on the ground, the NSW Planning Department engages with and responds to it in the context of the planning approval process of Stage 3 WestConnex. It is intolerable that Haberfield and Ashfield residents should be exposed to a further five years of the atrocious impacts of WestConnex, many unknown or understated.

As a result of this on the ground experience, we strongly object to any M4-5 (Stage 3) above ground construction or associated sites in Haberfield and Ashfield.

The M4-5 Link EIS proposes at least 3 and possibly up to six (6) above ground civil and tunnel construction sites in Haberfield and Ashfield. A considerable part of the proposed construction of Stage 3 would overlap with the construction of the M4 East. The EIS acknowledges this but fails to deal with it in any meaningful depth.

The EIS provides absolutely no certainty for the residents of Haberfield and Ashfield. Instead it purports to offer a choice of Options A and Option B with no measurable accounting for the levels of disruption of either option.

We specifically object to Construction Options A and B in any possible combination.

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 Option B civil and tunnel sites outlined in the M4-M5 Link EIS. We would be shocked if any government authority did not agree that planning decisions that could result in major impacts on the health and quality of life of people could be made without public feedback and Independent analysis.

We object to the suggestion, within the EIS, that there is 'choice' in this matter. Given the very loose indicative nature of Option A and Option B; the lack of detailed construction design and work plans; and the indicative only nature of spoil truck routes it is unacceptable to suggest either that there is a choice or that approval should be granted on the basis of such paucity of information.

Option A and B both involve a breach of promise given to residents of Haberfield and Ashfield during the M4 East (Stage 1) EIS process. This promise was given by given by the WestConnex Delivery Authority (WDA) – now the Sydney Motorway Corporation (SMC).





Haberfield and Ashfield residents were repeatedly told in 2014 and 2015, during the Concept and EIS Phases of WestConnex Stage 1 (M4 East project), if or when WestConnex Stage 3 were to be proposed and approved, that there would be no need for above ground construction in this area for the building of the M4-5 Link tunnel.

At many information sessions and meetings, residents were told that whilst there would be major impacts on residents during the building of the M4 East, that 'all would be over for us in 2019' at the point when the M4 East tunnel was completed.

They were specifically informed that road headers would continue underground from the M4-5 Link mainline tunnel stubs (ending under 142 Alt St Haberfield), that any connector tunnel from the Wattle St surface ramps to the mainline tunnel would be built underground; and that the M4-5 Link surface road entry and exit ramps on Wattle St, (alongside the M4 East ramps) would be all that was needed for construction and spoil truck vehicles.

In summary, residents were repeatedly informed that if the M4-5 Link were to be approved, everything required for it would have been built and completed as part of the construction of WestConnex M4 East.

Residents and Councils have repeatedly objected to the staged approach to the planning of WestConnex. This allows what are presented as settled proposals to become open ended and 'flexible' with changes being presented in later stages that break promises made in earlier stages. This introduces an unacceptable level of unpredictability into the lives of affected residents with little recall. New stage proposals and accompanying justifications fail to take account of previous statements and claims in earlier stages leaving residents in a constant state of upheaval. This is exacerbated by the very indicative nature of the M4/M5 EIS such that nothing is certain. This lack of integration between the M4-5 Link and M4 East projects in Haberfield and Ashfield, effectively extending above ground construction sites and construction and spoil trucking in the community from 2019 until 2022/23, demonstrates an approach to planning and approval that is disdainful of the impacts of these projects on residents. Residents in these areas now face up to eight years of major construction impacts. This reflects poor construction planning and management and a total disregard for the cumulative adverse health and social impacts upon residents.

The impacts of construction were underestimated in the EIS for both the M4 widening ( for the people of Granville) and the M4 East. Either the authors of this EIS have failed to learn from experience or are deliberately underestimating and describing the likely impacts on residents. When the M4 East preferred route and M4 East EIS was released in September 2015, a much larger interchange at Wattle St, Haberfield was announced than had originally been proposed during the Concept Phase in 2014. This larger interchange, requiring demolition of many homes and commercial premises was 'justified' to residents because the future M4-5 Link tunnel was to be constructed entirely underground and also within M4-5 Link surface entry and exit ramps to be built as part of the M4 East Project. Wattle St was widened to allow for both M4 East and M4-5 Link surface to tunnel entry and exit ramps. As well, the M4 East Parramatta Rd Ventilation Facility was to be built as a single large and massive complex, between Wattle St and Walker Avenue, Haberfield because it was to contain the exhaust stack chimneys for both the M4 East tunnel and the future M4-5 Link tunnel.





## **3.2 Leichhardt**

### **3.2.1 Darley Rd Construction site**

WAG is very strongly opposed to any approval of the Darley Rd, Construction Site. The material in the EIS related to this proposal lacks detail about what is actually proposed or how the severe impacts of the proposal would be mitigated if it were to go ahead. On this basis, it should be rejected on the grounds that it exposes a residential community to unacceptable danger.

### **3.2.2 Traffic**

The Darley Road civil and construction 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 and anyone who have driven there knows, 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. There should be an independent review of the construction impacts which we believe underestimate the true likely impact of extra traffic.

One detail that is included is the number of vehicles that would go in and out of the site on a daily basis. 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 acknowledged advice that this is an inappropriate site for construction should be heeded.

### **3.2.3 Truck route**

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 permitted into James Street. The proposed route will result in a truck every 3-4 minutes for 5 years running directly past 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. 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. The proposal places residents in danger and should not be permitted.





### 3.2.4 Health risks to residents

The EIS states that the 'main risks' during construction would be associated with dust soiling and the effect of airborne particles and human health and amenity (xii). This will affect local air quality. There is no detail as to how this will be managed other than covering the spoil under an acoustic shed (of low grade). It is likely the Dan Murphy building has asbestos which creates additional risk during the demolition process. The 'main' health risks should clearly include the truck movements discussed above posing both a physical danger and unacceptable noise pollution.

### 3.2.5 Removal of vegetation

The EIS proposes removal of all vegetation on the Darley Road site. There is a mature tree located on the site which serves as a visual and noise barrier to the heavy City West Link traffic. Removal of this tree and other vegetation will increase noise impacts to nearby residents and affect the visual amenity, with homes having a direct line of sight to the City West Link. The existing mature tree needs to be retained on this and environmental grounds and the protection it currently provides should be enhanced by more tree planting. Under the New M5, there was a condition that a tree report had to be done on every tree that the project proposed to remove. The effect of this condition was that a report was simply commissioned that always found removal was warranted if the project team desired it to happen. Rather than seriously consider the implications of construction against the protection of the environment, these assessments effectively rubber-stamped destruction.

### 3.2.6 Noise

We further object to the selection of the Darley Road site on the basis that the works required (demolition and surface works) will create unacceptable and unbearable noise and vibration impacts for extended periods. The EIS indicates that at least 36 homes will basically be unlivable during this period. In addition, the planned 170 heavy and light vehicles will considerably worsen the impact of construction noise.

The EIS states that construction noise levels would exceed the relevant goals without additional mitigation. The additional mitigation is mentioned but not proposed. All possible mitigation should be included as a condition of approval. The EIS acknowledges that substantial above ground invasive works will be required to demolish the Dan Murphy's building and establish the road. The EIS noise projections indicate that for 10 weeks residents will suffer unacceptable noise impacts. The EIS does not contain a plan to manage or mitigate this terrible impact. There is no detail as to which homes (if any) will be offered at least temporary relocation; there are no details of any noise walls or what treatments will be provided to individual homes that are badly affected. We know from the experience of residents near M4 East and New M5 construction that the construction joint venturers do not provide adequate alternative accommodation and subject residents to on-going out of hours construction and spoil truck movements.

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). What is 'reasonable and feasible'? This is not good enough. The EIS does not contain any detail whatsoever of these proposals on which to comment. In addition, there is no





requirement that measures will in fact be introduced to address noise impacts. If this proposal was to be approved, conditions must contain detail of specific noise mitigation measures that are mandated in particular areas and can be enforced. Experience in Haberfield and St Peters has shown that the contracting company has regularly disputed the need for mitigation. The reporting of breaches of conditions has been ignored or noted but with no mitigating action taken and residents have been exposed to horrific noise. This level of non-accountability is not acceptable to the community. Standard conditions without detail or accountability are not acceptable.

The EIS does not mention the impact of aircraft noise and its cumulative impact. As such, the noise levels identified are misleading.

### **3.2.7 Night works**

The EIS states that to minimise disruptions to traffic on the existing road network (including in peak hours) there will be night works where appropriate. Given the congested nature of Darley Road, it is likely there will be frequent night work (EIS, 6.4). This will create an unacceptable impact in residents. The community is well aware of the dreadful night noise that has impacted on the residents of Haberfield and finds it unacceptable that SMC and RMS would be again knowingly allowed to inflict it on another community. NSW Planning should not impose such open-ended conditions. And, instead of a proper plan to manage traffic, the EIS contemplate work simply occurring with no alternative traffic arrangements. Night work is objected to in the strongest terms.

### **3.2.8 Parking**

No workers associated with the WestConnex project should be permitted to park on local streets. There is already a shortage of parking in this area and many residents do 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 current 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 if Darley St is to be a construction site.

### **3.2.9 Installation of a permanent motorway operations complex**

We object to the location of a permanent substation and water treatment plant following the completion of the project on the Darley Road site. This was not included in the concept design and is a breach of promise by SMC that the land would be returned after construction to the community. The land is Government-owned. 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 there it would have to be moved to the north of the site so that it is out of sight of homes and has less visual impact on residents.

### **3.2.10 Tunnelling dangers to Leichhardt community**

The estimated tunnel depths for the Leichhardt area are as low as 35 metres. This creates an unacceptable risk of damage to homes due to settlement (ground movement). The EIS





acknowledges that tunnelling at 35 metres and less presents a real risk. There is no mitigation provided for this risk. Instead, it states that properties will be repaired at the Government's expense. However, no details or assurance as to how this will occur are provided. The project should not be approved with such tunnelling depths permitted with no detail provided about potential risk of damage and how and when it will be repaired and whether repairs will be sufficient in the long term. If damage were to occur, residents and businesses would be forced to engage structural engineers and lawyers to prove that the damage was linked to Westconnex works, with no assurance that this property damage will be promptly and satisfactorily fixed. There is an added legal risk to residents should the project be privatised. This is unacceptable.

### **3.2.11 Impact on safe walking and riding to schools**

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. The presence of 170 heavy and light vehicle movements a day at this site will create an unacceptable risk to students. The EIS should not permit any truck movements near the Darley Road site. If the proposal should be approved (which we certainly strongly argue it should not be), an alternative proposal which provides that all spoil trucks enter and leave from the City West link is the only proposal that should be considered.

### **3.2.12 Lack of transparency and Improper handling of public moneys**

We object to the acquisition of the Darley Rd site on the basis that Dan Murphy's 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. It is very clear that there has been a lack of transparency in the dealings with this site. We refer NSW Planning to a number of media articles and questions in parliament. At the feedback sessions on the Concept Design in 2016, the M4/M5 team were asked for information about the construction sites. Journalists and residents were given conflicting information on different days. This lack of transparency is one of many examples of secrecy and lack of straightforward communication on the part of SMC which reflects a failure to comply with 'meaningful consultation' as required for this EIS to be accepted by the Secretary of NSW Planning.

Serious probity issues have been raised about the dealings with this site and the Premier has now been referred to the Independent Commission Against Corruption in relation to this matter. Until the legitimacy of the acquisition of this site for the M4-M5 Link has been independently determined, the Dept of Planning cannot approve this EIS, of which this site is an intrinsic part.

### **3.2.13 Tunnel vertical alignments**

In 5.3.6 of Chapter 5 the EIS states that 'the tunnels would generally have grades of less than four per cent. However, isolated locations connecting to the surface road network may require short lengths of steeper grades of up to eight percent. These grades would generally match with existing conditions on local surface roads or are required to ensure appropriate ground conditions with no direct property impacts.'





In 2014 the RMS Advisory Committee on Tunnel Air Quality published a technical paper (TP09) 'Evolution of road tunnels in Sydney'. The paper highlights the key lessons learnt from over 20 years of experience in assessing and operating long road tunnels as it relates to the assessment, design and operation of ventilation systems to manage air quality in and around tunnels. A key lesson identified in the paper is the need to minimise the gradient of the tunnel.

'The M5 East has a gradient of eight per cent at the exit of the westbound tunnel. The increase in gradient resulted from a late design change to facilitate the placement of tunnel spoil between Bexley Road and King Georges Road. This was to substantially reduce the number of truck movements on local roads during construction. The unintended consequence of this change was that vehicles exiting the west bound tunnel are under significant load with multiple consequences for air emissions. Firstly vehicle emissions per distance travelled significantly increase with increase in grade. This is especially the case for laden heavy vehicles (eg trucks returning from the port). Secondly the steep grade slows down heavy vehicles which contribute to congestion throughout the west bound tunnel further adding to vehicle emissions as compared to free flowing traffic. Consequently the Cross City and Lane Cove tunnels were designed to minimise gradients.

As a result of this analysis the RMS concludes that a key design requirement for new road tunnel projects is to minimise grades. It is therefore astonishing that the proponent is now planning to ignore this advice and repeat the mistakes of the M5 and incorporate tunnels with inclines of up to eight per cent. These steep tunnels will have multiple direct impacts on air emissions. vehicle emissions per distance travelled significantly increase with increase in grade. This is especially the case for laden heavy vehicles which the tunnel is intended to take off local roads and which are intended to be users of the tunnel.

This proposal should be rejected. If the Proponent wants to proceed, it should be required to redesign the tunnels so that no gradient exceeds 4%.

### **3.2.14 Flooding**

Darley Road and adjacent streets such as Hubert St are exposed to flood. The flood impact could be exacerbated by the disruption or blockage of existing drainage networks, which are risks identified in the EIS. The EIS has not assessed whether the identified risk to the existing drainage network will cause increased risk of flood damage to flood lots and it fails to take account of the Inner West Council's Leichhardt Floodplain Risk Management Plan which contains recommended flood modification options. The EIS has not assessed whether its drainage infrastructure will impede the Inner West Council's Leichhardt Floodplain Risk Management Plan option HC\_FM3 to lay additional pipes/culverts from Elswick Street to Hawthorne Canal (via Regent Street and Darley Road). RMS has not assessed whether its drainage infrastructure will impede Inner West Council's Leichhardt Floodplain Risk Management Plan option HC\_FM4 to lay additional pipes/culverts from William Street to Hawthorne Canal via Hubert Street and Darley Road. The EIS should not be approved as it has not properly explained or assessed these impacts.





### **3.2.15 Crash statistics - City West Link and James St intersection.**

The EIS only analyses crash statistics near the interchanges. It does not provide any detail as to the number of crashes at the James St/City West Link intersection which, on Transport for NSW's own figures, is the third most dangerous intersection in the inner west. Nor does it comment on the two fatalities that occurred on Darley Road near the proposed construction site. The EIS should have detailed increased risk assessment in relation to the increase in crashes that could result from the additional 170 vehicles a day that are proposed to enter and leave Darley Road during the construction period.

## **3.3 Rozelle/Lilyfield**

### **3.3.1 Rozelle Rail Yards and Rozelle Civil Site**

Rozelle is the proposed site of a massive interchange that would be built underground. This submission focuses on the disastrous construction impacts of this site.

The sections of the EIS that deal with this site are not sufficiently detailed to be regarded as an EIS. What is presented is only a concept design. SMC has been unable to point to another similar underground interchange anywhere in the world, and has rejected the only expression of interest received to build the interchange. There must be real doubt as to whether this interchange can be built as per the concept design. No engineer has been available at the EIS sessions to discuss how three levels of crossing tunnels could be built under densely populated streets of old houses in Rozelle. This is a serious lack in the EIS and is grounds for a full reconsideration of the proposal.

### **3.3.2 Construction Impacts**

We object to the fact that already the Rozelle Rail Yards are being torn up on the basis of this EIS that lacks any detailed consideration of the serious risks and impacts of the proposed M4/M5 link. If construction was to begin, the impact on the area would be devastating.

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. It should not be allowed to proceed without a comprehensive investigation.

What is shown in the EIS certainly does not provide a basis on which this project could be approved. There are indications in the EIS of what could 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 worked out. This may result in major changes to the project design. 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 and is just another example of the failure to meet the requirement for public consultation for the project.





The EIS further 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. That is, the EIS acknowledges that these streets will see a massive 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.

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 could be 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.

The proposed work hours for the Rozelle Rail Yards are: tunnelling and spoil handling 24 hours a day seven days a week; and 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 whenever the schedule has fallen behind and this has lead to unacceptable physical and mental stress for many residents through interruption to 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 impacts have not been properly addressed and are not adequately dealt with in the EIS.

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, residents located along Lilyfield Rd between Victoria Road and Gordon St which overlook the Rozelle Rail Yards are likely to experience the greatest construction noise impact within the Rozelle area.





There will be increases of noise in the area of Johnston St where traffic volumes will increase. Residents will be at greater risk of health impacts associated with increased noise. In the EIS it is stated that residents may have to keep their windows closed. They may well experience sleep disturbance and interference of normal living activities such as eating outdoors over a long period of time. However the EIS considers this to be only moderately negative. This is not acceptable.

There are two areas in the Rozelle Rail Yards site where construction will be by cut and cover. These are the Portals for the Western Harbour Tunnel and the Portals for the M4/M5 link. This is of particular concern in the light of residents experiences in the areas of Haberfield and St Peters where highly contaminated land areas were being disturbed. There was and still is totally inadequate control of dust in these areas, where the dust would have been loaded with toxic chemical particulates. The old Rail Yards are highly contaminated land from their past use. The EIS gives no specific details of how this highly toxic threat is going to be securely managed. It is not acceptable for this to be decided only when the construction contracts have been issued, at which point the community will have no say or control over the methodology to be employed for removing vast amounts of contaminated spoil.

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.

### **3.3.3 Parking**

According to the EIS the Rozelle Rail Yards would have 400 car parking spaces for workers. There would 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 could be up to a further 150 additional vehicles that would not be able to park in the Construction sites on a daily basis. The EIS suggests workers would use public transport. If not, they would have to park on local streets in the area. Parking is already at a premium in the surrounding streets and is worsening all the time with the success of the Light Rail and out of area commuters daily leaving their cars at light rail stops.

It is totally unacceptable that the local streets accommodate contractors' extra vehicles on a daily basis over a 5 year construction period in an area where parking is already very scarce. This impact on local traffic has not been sufficiently taken into account in the 'cumulative impacts' report. The Rozelle Rail Yards site will generate an enormous amount of traffic in an already congested area. We believe this has been underestimated in the EIS and ask that the assessment of the impact be independently evaluated.

### **3.3.4 Traffic congestion gets worse**

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 and also be greatly increased if Stage 3 were ever completed. It states that Stage 3 would 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. 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. This is not acceptable as part of an EIS.

The EIS also states "that without the 'construction scenario' the City West Link/The Crescent and The Crescent/James Craig Road intersections are forecast to operate satisfactorily at LoS D or better in both Peak periods. With the 'construction scenario' the operational performance at the intersections is forecast to worsen". And after 5 years of construction and the spending of more than \$18 Billion the outcome at these locations will be worse. This is not acceptable.

According to the EIS, in relation to 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".

In the full knowledge that this area will be at capacity in 2021, not only does the proposed Stage 3 not address this issue but in fact the construction traffic associated with Stage 3 will force the traffic beyond capacity for much of the construction period of 5 years. Beyond this, 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 not about improving traffic flows and in fact will be contributing to traffic problems in this area.

The widening of the Crescent between the City West link and Johnston St with an extra lane being constructed will lead to heavy traffic congestion. This will be exacerbated still further by extra traffic light control cycles being incorporated into the signaling at both Johnston St and at the City West Link, with the inclusion of an extra traffic light control 400m West from the Crescent/City West Link junction to manage the movement of large numbers of spoil trucks.

As indicated above, 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 willful waste of taxpayer money.

In 2033 with the M4 - M5 link the WRTM is forecasting reductions in peak travel times between the M4 corridor and the Sydney Airport/Port Botany area. The times savings that are quoted are miniscule! Between Parramatta and Sydney Airport the time saving is 10 minutes. Between





Burwood and Sydney Airport the time saving is 5 minutes. Between Silverwater and Port Botany the time saving is 10 minutes. So for well over \$20Billion all that can be saved is just a handful of minutes! This total waste of public money is completely unacceptable.

These points beg the question as to the value of Stage 3 as it will increase traffic congestion in some areas and knowing this has no plans to address this. This is totally unacceptable as a proposal stated to be about improving traffic in the city. Taking into account that the “success” of the M4/M5 link (according to the EIS) depends on building a further three extensive road networks, not yet planned let alone approved, this seriously raises the question as to the purpose of WestConnex and in particular Stage 3. Even according to its own EIS, Westconnex will not work. These kinds of statements in its own EIS make it abundantly clear that Westconnex is not about improving our city but directing taxpayer money to private profit. Any serious plan to address transport infrastructure in Sydney would at the very least seriously consider public transport alongside roadways. The fact that this proposal will result in increased traffic congestion in an area that is to be substantially and extremely negatively impacted by Stage 3 over a number of years of construction; and finally, will result in very small, if any, improvements in traffic flow in the long run, strongly indicate that the government needs to go back to the drawing board for a proper and transparent overhaul Sydney’s failing road systems.

### **3.3.5 Criss-crossing tunnels under homes**

According to the ‘concept design’, the tunnels under Rozelle/Lilyfield are going to be on three levels. SMC engineers have told residents that the top one of these will only be 15 metres from the surface. The EIS does not explain how such an exchange would be built. It does not explain what safety procedures would be undertaken to deal with situations like serious congestion, accidents or fire if it should be built. With a serious traffic hold-up in the deepest of these tunnels, the air quality will very quickly become toxic unless substantial air conditioning is a major part of the design. No adequate explanation of the plans to manage pollution in these tunnels is provided.

The EIS states 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.

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 originally part of the plan, it is highly concerning to see this reference to future motorway connections but no disclosures outlining where these connections could be. 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 homeowners have been dealt with by Westconnex, the consideration of other areas for add on sectors to this project is of great concern.

The tunnels under Rozelle/Lilyfield are going to be in three levels. Leaving aside the question of the unexplained complex engineering involved in such a design, the EIS does not explain what safety procedures are being built into the project. How are situations such as heavy traffic congestion, accidents or fire to be dealt with. As stated above a serious traffic hold-up on the deepest of these tunnels would seriously impact air quality that could put the lives of people in the tunnels at risk. There is no in-depth detail about how these issues are going to be addressed in terms of both above ground and below ground risks. Again this is irresponsible and unacceptable.

### 3.3.6 Air Pollution

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 in this area. Tunnel Portals are known areas of high levels of pollution. It is unacceptable to build these tunnels in densely populated areas, and 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."

Recently built tunnels in Tokyo successfully filter 98% of all pollutants. Given the technology is easily available It is totally unacceptable that the tunnels will not be filtered.

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.

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)

The Health costs of outdoor Air Pollution in Australia are up to \$8.4 Billion a year. The Health costs of Particulate Pollution in the Sydney Greater Metropolitan area is around \$4.7 Billion a year. With no filtration on the Westconnex tunnels these Health costs will rise substantially.

The EIS shows a diagrammatic explanation of the way the polluted air will be expelled from the Westconnex tunnels. This method will work on straight tunnels of short distance providing there is no traffic congestion. There are already signs in tunnel locations in Sydney advising motorists to roll up their windows and put on their 'in vehicle circulating' air conditioning. This type of straight line pollution expulsion does not work if the tunnels go around corners, which is the case with the tunnels from the Rozelle Rail Yards site.

The three Pollution Stacks in the Rozelle Rail Yards are shown to be 38 metres 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 metres above sea level. Balmain Road between Wharf Rd and Victoria Road is at an elevation of 37 metres on average. Orange Grove Primary School is at an elevation of 33.4 metres. Areas of Hornsey Rd Rozelle are at 28 metres. Around the junction of Annandale St and Weynton St in Annandale the height above sea level is 29 metres. All these areas are in close proximity to these stacks. All the pollution being exhausted from these stacks will be entering the atmosphere at around the same level as housing and schools and local services and will be dispersing 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 areas highly polluted. This is not acceptable. There are at least four schools of Primary age children well within one kilometre of these Stacks. Young children are the most vulnerable to pollution related disease. Given this, this is an unacceptable risk and the proposal should not be approved.

The Rozelle Rail Yards site is a totally inappropriate area to create new recreational grounds as the area will be highly polluted as a result of the surrounding unfiltered Pollution Stacks and Tunnel Portals. In the EIS it is referred to as an ideal 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 irresponsible and beyond belief. It demonstrates that those who have put these plans together are either staggeringly ignorant or disdainful of the impacts of these proposals on the local communities. At a time when major cities around the world are doing all they can to address the dire problems of environmental pollution, including removing major roadways and investing in public transport, this is an appalling suggestion that reflects a planning process that is at best out of touch and at worst deliberately misleading and disdainful.

### **3.3.7 Water Contamination**

The management of water in the Rozelle Rail 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.

### **3.3.8 Subsidence**

Land Subsidence in the areas of all tunnel routes is of great concern to all residents. This is of especial concern in the Rozelle/Lilyfield area where layers of tunnels are planned. There is likely to





be ongoing and considerable subsidence even when the tunnels are built due to the ongoing necessity to remove groundwater from the tunnels. This will lead to a slow drying out of the sandstone and hence settlement.

Generally the risk of settlement is lessened where tunnelling is deeper than 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 deep. This is of major concern. In the ongoing construction of Stages 1 and 2 vibration and tunneling activities have led to numbers of people experiencing extensive damage to their homes costing thousands of dollars to rectify. These people have followed all the correct procedures but as yet their claims have not been settled. This is totally unacceptable. The tunnelling proposals in relation to the Rozelle area are very likely to lead to the same problems and yet there is nothing addressing these major concerns in the EIS.

### **3.3.9 Removal of Community Parkland**

One of the main reasons for establishing Buruwan Park was to provide 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 where 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.

The removal of Buruwan Park between the Crescent and Bayview Crescent/Railway Pde Annandale to accommodate the widening realignment of the Crescent would be a particular loss of badly needed parkland in this Inner City area. Currently this suburb has fewer parks than almost any suburb in Sydney so this would have a direct impact on local people. Buruwan Park also lies along a major cycle route from Railway Pde through to Anzac Bridge, UTS and the CBD. The alternative route being suggested is poor and takes no real account of trying to encourage cycling as a mode of transport. Cycling should be made as easy as possible to encourage more ordinary commuters to bicycle and the alternative to the current level route directs cyclists to Johnston St and then up Bayview Crescent arguably the steepest road in Annandale.

### **3.4 St Peters**

Campbell St and Campbell Rd have already lost all of its houses and other buildings on the south side to the re-alignment works to take traffic down to the St Peters Interchange, which is being built on an old toxic rubbish dump. Residents here have already been subject to noise, dust and traffic and night work. None of this has been reflected in the 'cumulative impacts' assessment in the EIS for which there has been no actual assessment at all of the experience of residents during the Stage 2 New M5. This adds to the injury already done.





St Peters' three-level interchange is down the hill. There will be a massive double ventilation exhaust stack on the south-western corner of the interchange for the new M5 from Kingsgrove. For the stage 3 of WestConnex (M4-M5 link) there is now proposed another 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. St Peters School is neatly triangulated between the two sets of stacks which rise up above the Princes Highway. The prevailing winds in the 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. It will also impact on the streets and remaining parkland in the St Peters neighbourhood, especially Sydney Park, Simpsons Park and what will be left of the Camdenville Park and wetland. There are a lot of people in this neighbourhood who walk and use the parks who will be exposed to the exhaust stacks' pollution and the surface road traffic pollution and the noise.

The Environmental Impact Statement for Stage 3 admits that the traffic around St Peters will be worse when both stages are completed. The residents here will be exposed to 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.

It is not surprising that the traffic will be worse because the new M5 and the link from the M4 in Haberfield cannot take a direct route to the airport or Port Botany because the "Sydney Gateway" is not part of this WestConnex road project. The traffic will come out of the interchange and into Bourke and Gardeners roads which are both traffic jams. The whole purpose of WestConnex was supposed to be a better route to the airport and Port Botany and it is not even included.

### **3.5 Newtown/Enmore**

#### **3.5.1 Traffic**

The EIS traffic analysis does not provide results of traffic modelling of any local roads including Erskineville Rd, Edgeware Rd, King St or Enmore Rd. The EIS for the New M5 predicted that 60,000 vehicles extra a day will pour down the widened Euston Rd. These vehicles would either be heading further east, into the CBD or across via Erskineville and other roads to other parts of the Inner West including King Street. Only a small proportion of these vehicles would choose to use a tunnel to Haberfield or Rozelle.

Traffic congestion will worsen as a result of WestConnex which will impact on the health of residents, especially those living within 50 metres of roads. Hundreds of people live in units along Euston, Sydney Park, Mitchell and Erskineville Rds and King Street. Erskineville School and Newtown School are both close to roads. There is also no modelling of Enmore or Edgeware Rd, both of which will be impacted by increased traffic congestion. When EIS consultants at public exhibition events were asked why there was no modelling beyond the corner of Maddox Street and Euston Rd, they told residents that this was the area mandated by RMS. It is obvious that modelling needs to be done over a larger area to measure the impacts of traffic pouring out of interchange. The reasons for RMS drawing the traffic analysis boundaries so narrowly should be made transparent.





### 3.5.2 Tunnelling and Heritage

There has been no evaluation of the potential impacts of tunnelling on hundreds of old buildings including valuable and treasured heritage ones. The documentation of the heritage in Newtown is inadequate. The promise that repairs would be done if damage occurs during tunnelling is insufficient. Home owners in Beverly Hills who have experienced major damage from the St Georges Rd interchange works have been denied compensation by both RMS and the contractor Fulton Hogan.

### 3.5.3 No Consultation

Residents in the eastern part of Newtown were not notified of the SMC's intention to tunnel under Newtown School and surrounding buildings during the concept design phase. To this day they have never been notified that they could be impacted by WestConnex Stage 3. This is a failure of 'meaningful consultation' which is a requirement of the SEARS for this EIS.

### 3.5.4 Clearways in King Street

The NSW Planning assessment decision for the New M5 stated that the NSW government was committed to having no clearways on King Street, other than the current weekday peak hour ones. Shortly after this EIS was released, the RMS announced that they would be moving towards clearways in King Street, Newtown during the weekend. This countermanded a promise made by the ex- Minister for Roads Duncan Gay in 2015 and the commitment to in the earlier New M5 EIS decision.

Residents and business owners know that clearways would kill King Street. After the community expressed its anger, the Minister for Roads Melinda Pavey and the Shadow Minister for Infrastructure Anthony Albanese announced that there would be no clearways. These political shifts would seem to be more designed to assuage public opinion rather than to present an honest assessment of what the impact of increased traffic flowing from the St Peters Interchange will be on King Street and on surrounding roads. Unless WestConnex including Stage 3 is stopped, the thriving precinct of King Street Newtown will be vulnerable to clearways.

## 3.6 Camperdown/Annandale

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 hour. 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.

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 and subsidence 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 22 metres Hill St at 28 metres, Moore St 27 metres, (Vol 2B Appendix E Part 2) Catherine St at 28 metres, (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.

### **3.6.1 Health Risks**

It is clear that Annandale, Glebe, Rozelle and Lilyfield will be exposed to unacceptable health risks. With the massive number of extra truck movements, 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."

### **3.6.2 Removal of Local Parks**

Buruwan Park between The Crescent and Bayview Crescent/Railway Parade, Annandale to accommodate the widening realignment of the Crescent would be a direct loss of much-needed parkland in this inner city area. Further, Buruwan Park lies on a major cycle route from Railway Parade through to Anzac Bridge, IJTS and the CBD.

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.

## **3.7 Western Sydney**

Stage 3 of WestConnex is supposed to benefit the commuters and businesses of Western Sydney by improving the flow of traffic on the road system but the one element which could help drivers from the west, a direct route to Sydney Airport or Port Botany, is not part of the WestConnex project.

It will charge distance-based tolls which will fall heavily on people of Western Sydney who on average have lower household incomes while not delivering any obvious improvement to western Sydney traffic congestion.





The EIS fails to provide a convincing case for needing an eastern link between the new M4 and new M5 instead of upgrading the A3 connector. Most of the benefits the EIS ascribes to the stage 3 will only be realised in further stages – the western harbour tunnel or the Sydney gateway.

WestConnex, and stage 3, in particular, have huge opportunity costs because the funds which could otherwise have been spent by government on extending or improving public transport in western Sydney are dedicated to this massive road project and its ancillary surface road works. While we are told repeatedly that WestConnex will benefit the people of Western Sydney, the reality is that drivers from western Sydney will generate ever increasing revenue to investors in the operators of roads that do not serve their needs.

### **3.7.1 Project Need and Alternatives**

The original purpose of the WestConnex project was to improve and extend the M4 motorway and to connect the M5 to Port Botany and to Sydney Airport. Improving the road system for trucking freight was supposed to be the principal purpose. None of the three stages goes to Port Botany or to the airport.

The proposed link between the two motorways duplicates the A3, a national road which would be improved by an upgrade but does not appear to need duplication many kilometers further east. The eastern link between the M4 and M5 doesn't offer any obvious benefits to drivers in or from western Sydney.

Neither the new M5 (needed for the large trucks which cannot use the existing M5) nor the stage 3 tunnels go to Port Botany. For that there is a separate project proposal, the Sydney Gateway, for an additional tollway to move freight from the port to distribution centres further inland or directly to final destination (see Section 4.1.4 EIS Project development and alternatives). So it is misleading to claim improvement in freight movement as a benefit of this project. Instead the link to the M5 interchange at St Peters and the new M5 – if they fulfill expectations of numbers of vehicles using them – will deliver 1000s of vehicles into the roads to the airport which are already at capacity.

The discussion of the strategic need (chapter 3) states a number of outcomes from Stage 3 but nearly all of them depend on other road projects not part of WestConnex (eg, the Sydney Gateway or the western harbour tunnel).

Alternatively the EIS asserts time savings and benefits unsupported by evidence. The need for a link between Haberfield and St Peters is not substantiated. Achieving reductions of volumes of traffic on Parramatta Rd, King Georges Road or the existing M5 are asserted but the model which predicts 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 EIS is supposed to discuss alternatives to building the proponent's referred option but it is limited and the alternatives are not given the detailed scrutiny which enables the public to assess them on the same basis as the tunnel project. For example upgrading the A3 as an alternative to





the M4-M5 link is not discussed, modelled or costed although the section admits that the intersection of King Georges Road rebuilt as part of the new M5 project is expected to improve capacity.

Upgrading and extending the passenger train service alternative for Western Sydney – which is the preferred alternative of commuters travelling to the CBD from Western Sydney – is dismissed with: “A scoping study to better understand the need, timing and service options for rail investment to support western Sydney and the Western Sydney Airport” [is underway] p.4.18.

but no estimate of cost offered. The improvement of the public heavy rail train services by upgrading of tracks and the signalling system is not canvassed at all. Only the (private) Sydney metro and light rail extensions are identified with high capital costs or none cited. Since these are all private developments it is not clear why their capital costs are relevant. The impact of these new services on passenger/commuter needs is not included in assessing the need for the WestConnex project in this discussion. The bus service discussion is focused on moving commuters west to east as mass transit and dismisses local and suburban services in three sentences which are all about Parramatta Rd. Bus service needs further west are not mentioned. The discussion of active transport (cycling and cycle paths mostly) also goes no further west than Parramatta.

The summary discussion of public transport “constraints” is very general. It is focused on the need to relieve congestion on arterial roads, not the cross suburban needs of people living and working in Western Sydney. The benefit of the WestConnex stage 3 project is dependent on reducing the surface road traffic on Parramatta Rd and Victoria Rd but it is not at all clear that this project will have that impact and in any case depends on other separate projects, principally the Sydney Gateway.

Demand management is dismissed as either taking too long to have an effect, or it is dependent on psychology or the demographics are against it. This is not a serious discussion of using pricing or other measures to encourage people to time their road use differently or change transport modes. On the other hand the experience already of the impact of the new tolls on the widened M4 demonstrates the real effect of pricing signals.

### 3.7.2 Tolls

The section on tolls in the Social and economic Assessment Technical Working paper is remarkably brief given their impact on the drivers of Sydney will last for 43 years.

It is outrageous to quote in support of tolls studies paid for by a tollway owner – Transurban. No one would be surprised to find the studies assert:

“NSW’s toll roads have directly contributed \$14 billion in economic, social and environmental benefits over 10 years”. (Road tolling. 8.6.3 p.162).

The accounting firms, Ernst and Young and KPMG, are not independent sources. There are no details of how their studies arrived at the findings so it is not possible make an independent assessment of them. We are left guessing what is considered a social or environmental benefit. Citing studies paid for by a tollway owner undermines the credibility to the EIS’s discussion of tolls.





The proposed distance-based tolls will increase by 4% a year or by the CPI, whichever is higher. No justification for the increases is provided. The EIS discussion has to admit that the tolls are inequitable. The people of Western Sydney tend to have lower household incomes than the inner and northern suburbs so a distance-based toll is a double burden. When wages are falling even below a low inflation rate, to impose increases well above the inflation rate is an unfair burden on road users without adequate public transport alternatives.

The EIS reports that people on lower average incomes driving to work find the burden of daily tolls a significant financial cost and therefore they prefer to drive longer distances to avoid paying tolls. The shift of traffic onto Parramatta Rd when the toll on the widened M4 was re-imposed is evidence of drivers already avoiding the tolls.

Tolls are supposed to lead to “alterations to ... reduced or redirected emissions, reduced traffic accidents, vehicle operation cost savings” but there is no evidence provided of how these effects are achieved. While the new roads are tolled and the old routes remain free, there is every incentive for drivers to use the old routes and save their money. In an era of stagnant wages and precarious employment saving money is likely to be a more significant motive than this discussion recognises. This effect is evidently not taken into account when assessing the impact of the overall project in operation on driving patterns because the EIS predicts “no major shifts in daily forecast traffic onto alternative, parallel routes” (Appendix H Technical Working Paper, Traffic and transport). This is not credible.

The section refers to finding community concern in a consultation, but this is dismissed with this assertion:

“Although road tolling would be a cost to individuals, the benefits of tolling to the broader economy is (sic) a greater socio-economic consequence. Effects would be long-term and benefit the Greater Sydney Region.” (Appendix H, p.163.)

In other words the people on lower incomes in western Sydney with fewer public transport alternatives than further east are being asked to pay more for driving, to reduce congestion on roads for the benefit of greater Sydney! Since all the benefits of the WestConnex project the EIS states are linked to other projects to come – the western harbour tunnel or the Sydney gateway – it is not clear that western Sydney commuters will ever get any direct benefit for paying ever increasing tolls for 40+ years. I object to the tolls, with their built-in increase of 4% a year, which seem imposed principally to make the project saleable to a private corporation, like Transurban.





#### **4. Social, Economic and Health Impacts**

WAG strongly objects to the M4-5 Link social and economic negative impacts. The evidence shows that these would be devastating for the Inner West. These impacts would occur during construction and operation, across the Inner West and in Western Sydney, which would bear the brunt of tolls to pay for the project for decades. Although many impacts are acknowledged in the EIS, they are always glossed over or deferred for later consideration for mitigation or postponed to the 'detailed design' phase.

AECOM, the engineering consulting company that is responsible for the EIS appointed Hill PDA to do the study. Hill PDA was involved with AECOM in studying and promoting the UrbanGrowth NSW WestConnex Revitalisation Strategy for Parramatta Rd as far back as 2015. At this time, Hills PDA promoted the WestCONnex 33 tollway for its capacity to promote property development along Parramatta Rd. HillsPDA also has interests in property valuation and development. For these reasons, we don't consider this company to be a suitable choice of a consultant to do a social and economic impact study. We believe that its commercial interests and support for WestCONnex are demonstrated in the apparent bias in its study. We ask that NSW Planning seek advice from consultants more qualified to do an independent qualitative and quantitative study of social and economic impacts.

A large number of risks and benefits are described in the EIS. The reliability of the analysis depends entirely on the accuracy of traffic and air quality studies. If either of these, turn out to be wrong (we will also be submitting reasons why these are neither adequate or accurate), the social and economic risks and benefits referred to in the EIS will be way off the mark. This adds to our concerns about the choice of AECOM as a company to prepare the EIS Stage 3, especially given its inadequate EIS for Stages One and Two that failed to reveal the depth of impacts on communities or predict the difficulties residents would confront in seeking redress for complaints against contractors.

Another concern with the Social and Economic Impact study is that the findings about which of thousands of homes and social institutions will be most affected depends on the current route and design. WestConnex has made it clear that this the current plans are indicative only because the selected contractor will make the final decision at which point the public will have no formal opportunity for input at all.

##### **4.1 Negative impact of WestCONnex M4/M5 across Inner West during 5 years of construction**

The EIS does acknowledge many risks for the Inner West but in every case the study concludes that mitigation measures would be put in place post approval or that problems will be solved in the post approval "detailed design" phase. We are extremely concerned about this. The public will have no right of access to information or right of feedback post approval. Indeed because of the NSW government's plan to privatise the construction and operation of Westconnex, there will be no effective way of holding the consortium that wins the tender accountable for negative impacts. The potential consequences of this situation for residents' future health, environment and safety is disturbing.





The EIS concludes overall that the impact on the Inner West LGA during construction would be negative. Given that there'll be five years of construction, this is a serious matter. The study refers to this impact as 'moderate' but makes no attempt to quantify this negative impact either in terms of the costs to households or lost productivity. Nor is any attempt made to consider the cumulative impact of all the separate negative risks and how they would impact on the overall resilience and health of Inner West communities.

#### **4.2 Construction fatigue**

One of the worst aspects of the Social and Economic Impact study is almost no reference is made to the actual experience with impacts of the construction during the initial work on the M4 East and the New M5. There is a reference to the concept of 'construction fatigue' which will apply to communities who have already endured years of construction impacts and would be expected to endure a further five years. There is barely any explanation of the experiences of those experiencing 'construction fatigue', other than to state that it makes people more sensitive to impacts. I find the term glib and frankly offensive as Haberfield resident Sharon Laura, who spends a lot of time assisting residents who are suffering as a result of construction, explained to City Hub in August, 2017.

Its offensive and inhumane to describe the impact as 'construction fatigue'. Right now in Haberfield there are people who are suicidal, who've been hospitalised, who are taking sleeping pills to deal with noise, health problems are being exacerbated, relationships are being destroyed.

There is no reason why an impact study could not have been undertaken to review the impacts of existing construction. The failure to do so simply reinforces the impression that the findings are a foregone conclusion.

#### **4.3 Cumulative impacts**

The assessment of noise contained within the EIS does not discuss existing aircraft noise and potential future airport expansion in any detail, and how this relates to cumulative impacts in the proposal area. Aircraft and airport noise is already a significant aspect to the existing environment, particularly in St Peters, Sydenham and Tempe, and consideration of cumulative impacts between the proposal and the airport should be included as both are within the purview of the Government.

#### **4.4 Construction impacts glossed over**

Hundreds of impacts are identified but are never seriously evaluated against the claimed benefits of the project. These include:

- Traffic disruption and congestion
- Direct and indirect traffic disruption would be experienced on local and arterial roads in suburbs near construction sites. The impact of this would spread out across Ashfield, Haberfield, St Peters, Camperdown, Annandale, Lilyfield, Leichhardt, and Rozelle. This will lead to increased travel times over several years. This is treated as a temporary inconvenience. Those who experience daily traffic congestion know that five years is not experienced as 'temporary'.





- There would also be lane and street closures and traffic diversions that would cause shorter term inconvenience.

The EIS concludes that traffic delays would affect freight and commercial vehicle transport efficiency, travel time and connections to and between neighbourhoods and employment areas. People could shop less at local businesses, which could cause them to close. Individuals would lose time and money, general access and connectivity to surrounding areas or employment centres. The overall impact would influence productivity of the whole Inner West local economy. We suggest that NSW Planning should pay a visit to Haberfield to discuss with the business owners how serious this can be. Hundreds of jobs have been lost in both Haberfield and St Peters.

The EIS also acknowledges that delays in freight deliveries could add to costs that will be transferred to the community.

The EIS also finds that Increased traffic congestion during construction would increase emissions; that this is likely to impact on health and lead to lost work and education time and this disruption and disconnection would lead to a loss of sense and worth of community.

#### **4.5 Loss of safety, especially near schools, child care and aged care**

The EIS does accept that increases in traffic could reduce roadside safety, particularly in areas heavily used by pedestrian and cyclists, such as near schools, child care centres, aged care facilities and near public transport stops.

The EIS specifically mentions that a lot of extra traffic on Wolseley, Alt and Bland streets Haberfield could affect road safety for children at Haberfield Public School. There would also be risk to safety of those near Parramatta Rd in Camperdown, due to being near Bridge Road School and the Pyrmont Bridge Road tunnel site (C9).

The claim is made that the risks and costs of traffic congestion will be further considered during the detailed design phase. Once again how can residents be expected to trust this process, when an unknown contractor will be lodging a plan to which they will have no right of feedback. We note that no mention is made of instances in Haberfield where road closures did occur without proper notification, leaving visually impaired and other residents at risk. It would be more reassuring to at least recognise the failures and argue that lessons have been learned.

#### **3.6 Years of increased congestion on City West Link and Parramatta Rd**

We are already aware of the congestion on the City West Link and Parramatta Rd and it is hard to believe that NSW Planning would actually make a decision to make this worse by adding 700 heavy vehicles a day (one way), more than 200 of which would be during peak hour, for up to a five-year period. The EIS does acknowledge that this will further reduce the already very poor level of service on these roads and will have a 'moderate negative' impacts on the social and economic environment of the Inner West. We consider that to be serious.





The EIS states that it would be expected that on Parramatta Road, north of Wattle Street, the eastbound mid-block level of service (between traffic lights) is forecast to drop to LoS E (second most congested level) in the PM peak hour. On City West Link, west of The Crescent at Rozelle, the westbound mid-block level of service is forecast to decrease to LoS F (the worst level) in the AM peak hour.

It is expected that this extra traffic congestion on major roads could spin off onto local roads as drivers change routes to avoid congestion. This could impact on streets around Parramatta, Pyrmont Bridge, Victoria and City Links roads. Local streets in Rozelle are specifically mentioned. When you consider the relatively small area across which all this congestion is spread and the current state of congestion, the cumulative impact is a serious concern.

According to the EIS, the congestion could be so serious that it could cause people to shift to public transport. This could actually be a good thing except that public transport is already severely overcrowded. This merely highlights the stupidity of building more tollroads rather than investing billions more in public transport.

While recognising that the extra traffic would have a 'moderate negative' impact across the Inner West, the authors of the study sidestep this by pointing out that it would be not much worse than it currently is 'without the project' but they never consider what other means might be used to reduce traffic congestion. This is a major flaw in the study. The study advises that advanced warning through clear messages may ameliorate the impacts but acknowledges that even with these, the traffic environment would deteriorate across the Inner West region.

### **3.7 Noise Impacts**

WAG objects to the both the long and short-term impact that increases in noise and vibration will have on the lives of the hundreds of thousands of people who currently live, work or study in or near the route of the planned WestConnex, including the M4-M5 Link. We also object to the poor analysis of these impacts in the M4-M5 Link EIS.

Noise will have a long-term impact on those who would live beside the proposed M4-M5 Link, as well as in local streets and roads carrying extra traffic nearer tunnel exits and on 'rat runs'. Construction noise from demolition, thousands of truck movements a day and rock crushers would impact heavily on local communities and businesses. In some situations this could occur for several years. In others, the impact would be over shorter periods. Research has shown that noise does have negative effects on health. Vibration from construction including tunnelling could cause cracked walls. The proponent has already begun warning residents of this risk.

The EIS does recommend noise mitigation for some buildings, although only up to the first story. It recommends noise walls and other strategies that would reduce the noise.

The EIS provides no justification for not treating residential buildings exposed to road traffic noise greater than two (2) storeys in height. It provides no information regarding cumulative noise impacts from surface and underground tunnelling construction activities, or justification for not addressing construction noise at properties greater than single storey. Assessing such impacts







were outlined in the SEARS for this project. On this basis alone, these findings in the EIS should be rejected.

There are many gaps in the EIS when it comes to assessing these impacts, and much is also left to future decision making during the final design phase.

Even the way the EIS reports are presented make it difficult for residents to see whether their neighbourhoods would be affected by excessive noise levels or not. While it's expected that technical data can be hard to understand, the summary chapter should be presented in a more accessible way. It is not. Even so, it is clear that the EIS shows hundreds of homes and thousands of residents would be affected by noise either during both the three-year construction period and after the New M5 is opened if it is built.

There are many issues in this EIS that need to be reconsidered before any Planning approval should be granted. It is not acceptable that, given the uncertainty raised in a range of areas of the noise and vibration assessment, and the number of potentially impacted properties and people within the project area, the local community and other affected stakeholders have not been provided with the information they need to make a fully informed assessment. This must occur as part of the EIS consultation process where further comment can be sought from the community, and not simply resolved through the Submissions Report that does not allow any further community input.

Thousands of residents would be affected by construction noise. In some situations, for example, when pavements were to be torn up, this loud noise may only be for a few days or a week. Others will be forced to live next to demolition sites for more than three months or excavation sites and road works for up to five years.

Excessive noise impacts on the way people can use space, the ability to communicate and the way individuals undertake ordinary daily routines, such as gardening. It can cause stress and sleep disturbance, which in turn can cause health to deteriorate. For example, research shows that elderly people experiencing ongoing lack of sleep are more likely to develop dementia. Noise impacts are particularly felt by people that work from home, shift workers, the elderly or households with young children that need quieter environments to work, rest and relax.

Economic data shows that there is a higher proportion of health and social assistance workers who are often shift workers in the Inner West LGA than across the rest of Sydney. 1599 residences or thousands of residents would have noise levels in the evening sufficient to cause sleep disturbance. This is even allowing for acoustic sheds and noise walls.

We were very concerned to read that 162 homes and hundreds of individual residents including young children, students and people at home during the day would 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 are likely to severely impact on the health, capacity to work and quality of life of a proportion of the affected residents. NSW Planning should not give approval for this, especially given the difficulty residents near M4 East, M4 Widening and New M5 have experienced in achieving



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mitigation. A promise of some future plan to mitigate by a construction company yet to be nominated is not sufficient.

Some examples of areas that will be particularly affected include:

- Residents in 371 homes near the Darley Rd construction site would be affected by noise sufficient to cause sleep disturbance. The EIS promises negotiation over mitigation on a one by one basis. On other projects 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. 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.
- Residents in more than 100 homes across Rozelle would be severely affected by construction noise for months or even years at a time. These would include 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.
- 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. There is however a caveat – the properties would change if the design changes. My understanding is that the design could change without affected residents 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.
- A number of educational institutions would experience excessive noise including Childcare Explore and Develop, 372 Norton Street, Lilyfield, Billy Kids Learning at 64 Charles St, Lilyfield, Rosebud Cottage Child Care Centre at 5 Quirk Street, Rozelle and Rozelle Public School at 663 Darling St, Rozelle. This could interfere with learning and ability to play outdoors.

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.

We do not accept the finding 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 which has extended to sections of Sydney Park. Why would this stop, especially given the construction is just as close to houses in Campbell Rd. Is it because the noise is already so bad that relatively, it will not be that much worse. If this is the case, it casts doubt on the whole noise study.





### 3.8 Vibration

The EIS states that during tunnelling activities around receiver locations are predicted to experience temporary vibration above the preferred vibration dose value during night-time periods and that vibration would be discernible at each of these receivers for around five days, with exceedences likely for around two days. Longer durations of impact are predicted at receivers near the tunnel portals.

More direct consultation must be undertaken with each of these potentially impacted receivers before approval for night-time tunnelling works is given to determine whether or not this is an acceptable impact to impose on people during the night-time period. The justification for out of hours works should be the need to undertake the works out of hours due to safety considerations or in cases where there will be no or minimal impact to nearby receivers, as this is the industry standard for undertaking out of hours works. It is not acceptable to make a decision for 24 hours works purely on the basis of construction program. Additionally, the proposed noise and vibration management measures do not address this issue as they do not specify consultation with affected receivers prior to works commencing, nor do they contain any specific limitation on size of equipment to mitigate vibration impacts during works of close proximity.

The EIS acknowledges that if the current route were pursued, up to 229 buildings would be inside the minimum working distance of in the vicinity of works may be within the minimum working distance of vibration intensive equipment. These buildings house hundreds of residents. It is recognised that vibration could heighten "levels of stress and anxiety during construction activities" caused by "uncertainty of duration for impacts and concern for their properties." The authors observe that contractors would 'make good' damage but experience with cracking so far in Kingsgrove and Haberfield has shown that it is extremely difficult to get redress for cracking. Individual residents would be left to negotiate with powerful international construction companies and their sub-contractors. The difficulties that residents or other property owners could face is not even mentioned in Appendix P.

### 3.9 Visual impacts – loss of vegetation, community space and views

To quote from the EIS itself:

"Trees contribute to the identity of a neighbourhood, provide protection from the elements and provide intermittent or consistent screening and privacy. As such, the clearing of established vegetation is likely to be of concern to the community, particularly those where the visual amenity and landscape character of the area or property is altered due to a reduction in landscape screening."

8000 trees have already been destroyed for Westconnex. We are opposed to the destruction of even more trees in Foucart Street and Cecily Street, Rozelle and in Lilyfield. We don't consider that open space near pollution stacks is compensation for the removal of trees and parks. We are appalled to think that SMC is considering removing even more trees and access to sunlight for Haberfield homes that would have already endured years of construction.

While the vegetation in the Rozelle Railyards cannot be directly enjoyed by the community, it has grown undisturbed over many years to provide a green softening and visual break in a massively







congested stretch of road. If the project goes ahead, all these trees and bushes will be removed.

Other mature trees will also be removed from Rozelle's roads and streets.

Buruwan Park is well used by walkers and cyclists. It should not be removed from the community that has worked hard to develop cycle friendly pathways linking residents to Rozelle Bay.

By the time the M4/M5 would have happened, many residents will have their views replaced by ventilation stacks. This will include those using Easton Park and its well-used playground. This park is surrounded by closely built up urban streets. It is not appropriate to excavate a huge construction site so close to a community park. After operation, residents would look directly across to an unfiltered pollution stack. In this context, we find it extraordinary that Easton Park would ever have been considered as a possible construction site. To say that it has been saved is an overstatement.

Members of WAG have regularly visited the Haberfield and St Peters construction sites. Like many others they were shocked by the scale of the devastation but even more shocked when they spoke to those who had experienced the impacts, particular on their health. Before Stages 1 and 2 began, many Sydney residents were unaware of the likely destruction. Having now seen it, many readily agree that this same destruction should not have happened, let alone be visited upon Annandale, Lilyfield and Rozelle or be continued for more years in Haberfield, Ashfield and St Peters.

### **3.10 Overall impacts during construction on many social institutions**

We are concerned about the risks of construction impacts including noise, lack of access, sleep disturbance, poor air quality on 9 schools and childcare centres. We are very concerned about Haberfield School which would not only be near construction for a further five years but whose students would be exposed to safety risks from additional traffic.

We object to the choice of Darley Rd as a site for construction. This is a known danger point in Sydney. Why would Sydney Motorway Corporation insist on pushing for this site against the wishes of the Inner West Council and independent experts?

### **3.11 Negative impacts of the project after completion**

Social and Economic Impacts of the project after the opening of the M4M5 tunnel are only considered from the perspective of 2033. This means that there is no consideration of impacts from 2023-2033. Given the number of unknown factors, the conclusions can be regarded as little more than speculative.

Long term negative impacts on St Peters:

At 8-4 in Appendix P, the following passage occurs:

"St Peters interchange and surrounds are forecast to experience increased congestion and delays during the PM peak. The forecast in traffic growth for the St Peters interchange and surrounds is expected to cause delays and increase congestion for users. Negative socio-economic impacts associated with delays and congestion include reduced safety, health impacts, reduced amenity



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and community cohesion. The associated socio-economic impacts at St Peters would be medium-long term and would have the capacity to affect a large number of people and businesses across the Greater Sydney Region. Variances from the existing baseline environment would be large and socio-economic impacts would be possible. Therefore, the significance of effect is considered to be moderate negative.”

So in 2033 after the investment of a minimum of \$17 billion plus all the extra billions for other projects that are assumed to have been completed in this EIS, we learn that traffic congestion at St Peters, Haberfield and Rozelle will remain a costly problem in health, economic and social terms, not just locally but across the Sydney region.

The only answer offered is yet another traffic study or ‘Road Network Performance Review’ to be carried out by RMS in consultation with Councils and other measures to deal with congestion. So while drivers on the Westconnex would be paying tolls to pay to the tollways company for the M4M5, the tax payer would still be paying to construct more roads near the portals. NSW Planning officers must surely ask themselves whether it is not time to pull the plug on this disastrous regime of road planning in NSW.

### **3.12 Concerns of residents not accurately reported**

Table 6.1 in Appendix P (Social and Economic impact) summarises concerns identified through the community feedback process. This is not an accurate report of the concerns of residents provided at community feedback sessions. This table fails to convey the depth of concern and opposition of thousands of residents to the whole project. It fails to mention the strength of concern about the Darley Rd site or the concerns of residents in Haberfield and St Peters about more years of construction. It mentions concerns about heritage in Glebe but fails to mention concerns about heritage in Newtown. We can only assume that this is because there was almost no consultation in Newtown and a complete failure to notify residences on the Eastern Side of King Street and St Peters.

### **3.13 Human Health - Car dependency**

Tollways encourage car dependency which has proven poor health impacts. All citizens should have the option of affordable public transport options. Despite its massive cost, Westconnex including Stage 3 will push many citizens who cannot afford tolls onto congested local roads. The EIS fails to explain why more than \$7 billion has not been invested in public transport rather a tollway.

Professor Paul Torzillo, Head of Respiratory medicine at Royal Prince Alfred Hospital has stated that heart disease will increase due to air pollution caused by Westconnex bringing more cars into the Inner West. (Inner West Courier 23rd May 2017). NSW Planning and AECOM must specifically engage with critiques by medical professionals like Professor Torzillo rather than simply restating the same position over and over again.







### 3.14 Conclusion

When considered as a whole, the EIS Social and Economic study identifies hundreds of risks to the community. These impacts include dust, noise, the negative impacts of hundreds of trucks a day through neighbourhoods, loss of views, loss of heritage, loss of properties and businesses, loss of recreation space, stress, loss of sleep and health problems. Some residents will experience impacts for several weeks, some for four or more years and some permanently.

The EIS authors never attempt to seriously evaluate what the total cumulative impact of this devastation will be on the community. It also never considers whether in the light of the scale of the impact it would be better not to go ahead.

We understand that infrastructure development is likely to have some negative impacts. However given the congestion that will remain at the end of the project, the burden of tolls on communities in Western Sydney and elsewhere and foregone opportunities for other public infrastructure, we do not accept that these negative impacts on hundreds of thousands of people in my community are justified.

The EIS Social and Economic Impact study positive impacts of the project are measured from the standpoint of the 2033 traffic analysis – the intervening decade from completion in 2023 to 2033 is completely missing and the Strategic Business Case which is also out of date. There is no acknowledged that this Business case has been severely criticised by independent experts. It has now been revealed that the \$17b budget does not include any of the road works will be made necessary by the WestConnex, all of which will be borne by the taxpayer and which will continue from now until post 2033.

The overall finding that the benefits outweigh all the negatives is reliant on traffic and air quality studies and are based on completion of the the Western Harbour Tunnel, the Beaches Link, the so-called F6 (that would involve the destruction of hundreds of more homes and parkland). These projects are neither planned, let alone approved. We cannot imagine how Planning professionals would consider it appropriate to approve a project carrying such negative impacts on hundreds of thousands of residents on the basis of such speculative and uncertain evidence. We ask you to reject the project.



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#### 4. Traffic & Transport

We strongly object to this project because despite costing billions of dollars, the M4/M5 tunnel will not significantly solve the problem of traffic congestion in Sydney. In fact, it is likely to make it worse.

We agree with the City of Sydney that this 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 proposed link between the two motorways duplicates the A3, a national road which probably needs an upgrade but does not appear to need duplication many kilometers further east. The eastern link between the M4 and M5 doesn't offer any obvious benefits to drivers in or from western Sydney.

According to AECOM's EIS report for the benefits of this project to be fully realised, the F6, Western Harbour Tunnel, Beaches Link and the Sydney Gateway would need to be completed. In other words, this project depends on other tollways being built which are little more than concepts with no business case or planning approval.

These projects were not included in the WestConnex business case. They are not priority projects in any state or Federal roads plan. Indeed according to the EIS, even if all of these tollways were built, the whole Sydney network would only be 10% more productive than it is now. This makes no sense and is an outrageous drain on human, natural and financial resources.

The original purpose of the WestConnex project was to improve and extend the M4 motorway and to connect the M5 to Port Botany and to Sydney Airport. Improving the road system for trucking freight was supposed to be the principal purpose. None of the three stages goes to Port Botany or to the airport.

Neither the new M5 (needed for the large trucks which cannot use the existing M5) nor the stage 3 tunnels go to Port Botany. For that there is a separate project proposal, the Sydney Gateway, for an additional tollway to move freight from the port to distribution centres further inland or directly to final destination (see Section 4.1.4 EIS Project development and alternatives). So it is misleading to claim improvement in freight movement as a benefit of this project. Instead the link to the M5 interchange at St Peters and the new M5 – if they fulfill expectations of numbers of vehicles using them – will deliver 1000s of vehicles onto the roads to the airport which are already at capacity.

Further, the Federal Government's commitment to the construction of a second Sydney airport at Badgerys Creek was made after WestConnex was announced and its business case completed. Whatever we think about the Badgerys Creek site of the second airport, the announcement itself should have prompted a review of the project and the second airport should have been included in the planning of Westconnex.

By the time the Westconnex link between the M4 and new M5 is supposed to be completed in 2023, planes will be arriving at Sydney's new international airport at Badgerys Creek. When the Sydney gateway is added so WestConnex finally links to industrial areas in Mascot, most of the





area's freight industry and manufacturing jobs will have already relocated to the light industrial centres of Eastern Creek, the Broader Western Sydney Employment Area and south-west Sydney. In any case new freight infrastructure is already being delivered, - eg, the Port Botany Rail Freight upgrade and the Moore Bank Intermodal terminal. These projects will increase capacity to move freight to and from Port Botany by rail.

WestConnex will duplicate the existing M5 East motorway without clear benefits for freight transport because rail freight capacity will have been improved, the link to Port Botany depends on another (private) project and the Sydney airport links may well be redundant if the second airport is in operation. The rationale for both stages 2 and stage 3 of the WestConnex project falls apart, yet the second Sydney airport's impact on freight movement and other transport is not taken into account in the EIS. It is entirely possible that a second Sydney airport will reduce traffic to the airport at Mascot and the numbers anticipated as using the WestConnex tollways may not be realised. This is a significant risk to the NSW taxpayers as well the investors in any future private operators.

This Stage 3 project will build another tollway but the revenue will not go to cover the cost of construction of the new roads and tunnels but to provide revenue to private investors for 40+ years. While we are told repeatedly that WestConnex will benefit the people of Western Sydney, the reality is that drivers from western Sydney will generate ever increasing revenue to investors in the operators of roads that do not serve their needs.

#### **4.1 Traffic modelling is an inexact process**

Traffic modellers acknowledge that traffic modelling is a very inexact science. There is insufficient acknowledgement of this in the EIS.

Given the highly uncertain nature of traffic modelling, it is likely that even this claimed benefit would not eventuate. In any case any so-called 'benefits' needs to be considered in the light of all the other costs including the severe construction impacts over more than 8 years, lost opportunities including investment in other transport solutions, the future health, environmental and economic costs of encouraging car dependency and economic pressures created by toll roads.

The concept of congestion which even this EIS acknowledges will be a legacy of WestConnex are considered too narrowly in this EIS as 'traffic congestion' only rather than delays to reliable and efficient access to human capital, goods and services, which reduce economic activity and productivity. This results in an incorrect and misleading assessment.

However even within the narrow AECOM definition of 'traffic congestion', the EIS acknowledges that traffic congestion will be a legacy of WestConnex and reports that NSW Roads and Maritime Services is already working on more road building works in the future that will solve some of problems created by this tollroad building spree.

It is disturbing to see that the same method and logic used to develop and assess all the stages of WestConnex 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.





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. Why is there no evidence of the use of independent academic research in the preparation of this report by AECOM?

#### **4.2 Unwarranted assumptions underpin traffic analysis**

Unwarranted assumptions are made in the traffic analysis. In the case of the Western Harbour Tunnel, the NSW Labor party has said if elected, it would not build it. Forecasting with such uncertainty over a long time must at least mean that the claimed benefits may not eventuate and at the very least should be subject to careful independent review and testing by experts who have full access to all the assumptions on which they are based.

If this project goes ahead, there will be massive motorway interchanges with pollution stacks in St Peters, Haberfield/Ashfield and Rozelle. The EIS acknowledges that there will be traffic congestion problems around these interchanges in both 2023 and 2033. This will be a huge cost in economic and health terms. This traffic congestion will impose further costs and damaging impacts on communities that have endured up to eight years of construction. Surely in any rational and independent planning process, this finding alone would be enough to encourage an assessment authority such as NSW Planning to seriously ask whether an agenda that pushes building more and more tollways is not more of a problem than a solution. Instead all that we find is a lame proposal that NSW Roads and Maritime Services are already working on solving future congestion problems that this project would have contributed to by 2033.

#### **4.3 Use of WRTM is deeply flawed**

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. However the increased traffic on Parramatta Rd in response to the re-imposition of tolls on the widened section of the M4 suggests that these benefits are illusory and tolls are already high enough to be a disincentive, particularly if the time savings are smaller than 10 minutes.

The EIS refers 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 depends on this forecasting, the lack of transparency makes it difficult for the EIS to be subject to independent critique.





#### 4.4 Tokenistic analysis of public transport alternatives

The EIS pays lip service to WestConnex being part of a “broader solution” but in fact the analysis of public transport alternatives is tokenistic. Academic and independent research which provides alternative approaches to transport planning is ignored. We are particularly disturbed that there is no serious engagement with the City of Sydney alternative to the WestConnex solution.

The discussion of alternatives to building the M4-M5 link is limited and not given the detailed scrutiny which enables the public to assess them on the same basis as the tunnel project. For example upgrading the A3 as an alternative to the link is not discussed, modelled or costed although the section admits that the intersection of King Georges Road rebuilt as part of the new M5 project is expected to improve capacity. The alternatives are all discussed separately as single alternatives to the WestConnex project and no consideration given to how a mixture of traffic reduction measures could operate, eg, time-based pricing plus increased train services at peak hours.

Upgrading and extending the passenger train service alternative for Western Sydney – which is the preferred alternative of commuters travelling to the CBD from Western Sydney – is dismissed with: “A scoping study to better understand the need, timing and service options for rail investment to support western Sydney and the Western Sydney Airport” [is underway] p.4.18.

The improvement of the public heavy rail train services by upgrading of tracks and modernising the signalling system is not canvassed at all. Only the (private) Sydney metro and light rail extensions are identified with high capital costs or none cited. Since these are all private developments it is not clear why their capital costs are relevant. The impact of these new services on passenger/commuter needs is not included in assessing the need for the WestConnex project in this discussion. Yet it should be expected that the new Metro and light rails services will provide mass transit alternatives to single occupancy car transport which will reduce the traffic.

The bus service discussion is focused on moving commuters west to east as mass transit and dismisses local and suburban services in three sentences which are centred on Parramatta Rd. Bus service needs further west are not mentioned. The discussion of active transport alternatives gets no further west than Parramatta and is entirely focused on cycling.

The summary discussion of public transport “constraints” is very general, focused the need to relieve congestion on arterial roads, not the cross suburban needs of people living and working in Western Sydney. The benefit of the WestConnex stage 3 project is dependent on reducing the surface road traffic on Parramatta Rd and Victoria Rd but it is not at all clear that this project will have that impact and in any case depends on other separate projects, principally the Sydney Gateway. Rather than ease congestion the project is likely to reduce the availability of funds for projects that genuinely reduce congestion (road pricing) or give priority for high productivity road users such as delivery and service vehicles.

Since this EIS was lodged, there have been media reports that the NSW public transport budget has been cut. This is concerning given that data from the Opal card statistics show that use of public transport across Sydney has increased substantially in the past year. Public transport





projects would genuinely contribute to avoiding traffic congestion. There should be a transparent investigation into whether the WestConnex project is actively contributing to the government turning away from alternatives to WestConnex and further tollways.

Demand management is dismissed as either taking too long to have an effect, is dependent on psychology or the demographics are against it. This is not a serious discussion of using pricing or other measures to encourage people to time their road use differently or change transport modes. On the other hand the experience already of the impact of the new tolls on the widened M4 demonstrates the real effect of pricing signals.

#### **4.5 Anzac Bridge and CBD will be even more congested**

Those who read the full EIS (which is extremely difficult for most people to do) will find that Anzac Bridge (projected 60% increase in daily traffic) and Sydney City Centre (CBD) will be inundated with more traffic. Bus transport along these routes will be slower and less reliable. It is outrageous that a 21st century infrastructure project would actually worsen public transport options.

#### **4.6 Tolls**

The section on tolls in this document is remarkably brief given their impact on the drivers of Sydney who will be affected by them for 43 years. The discussion admits that the tolls are inequitable. People on lower average incomes driving to work will find the burden of daily tolls are a significant impost. The impact of avoiding the tolls could possibly have of sending traffic into local, untolled, roads is not taken into account in the overall assessment of the benefits of WestConnex project.

#### **4.7 Freight**

The EIS projects increases in freight volumes without offering evidence as to how the project enables this. Assertions relating to improvements for freight services rely on the Sydney Gateway Project, which is not part of WestConnex, and which poses significant threats to the crucial freight rail connection to Port Botany. Port Botany itself has questioned whether the current project provides any benefit to it. At the moment, Sydney Gateway is subject to a highly questionable unsolicited bid which involves a number of past government insiders. No assertions about the benefits of this project should be accepted at face value.

#### **4.8 Benefits depend on unplanned, unapproved tollroads**

Arguments in support of the project depend on the approval of further toll roads. These other proposals, such as the F6, are being planned secretly. There are reports that the F6 will take hundreds of houses and parks. We are opposed to Stage 3 being approved on the basis that such a project would be completed.

#### **4.9 Slowing down public transport**

Just as with the other stages of WestConnex, this project would 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 the Anzac Bridge.





In assessing the project it is crucial to 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. What is the point of speeding through a tunnel if you end up sitting in a traffic jam?

#### **4.10 Johnston Street, The Crescent/Minogue Crescent and Ross Street; Edgeware Road; Erskineville Road**

The modelling area shown in Figure 8-5 should be extended to include Johnston Street and The Crescent/Minogue Crescent/Ross Street corridor to Parramatta Road to provide clarity on how these feeder routes are envisaged to operate in 2023 and 2033. It should include the modelling assumptions applied. There is also insufficient traffic modelling to reveal the impact on Erskineville Road and Edgeware Rd, both of which are already highly congested and will be negatively impacted by traffic emerging from or avoiding the New M5.

#### **4.11 Traffic exceeding operating limits**

If it is assumed that the modelling is correct, it shows the Stage 3 motorway would exceed reasonable operating limits in peak hours in less than ten years. On the other hand, there are already reports that the levels predicted will not be profitable enough and will in fact be less than predicted (SMH 'Pressure builds on government to sweeten WestConnex sale' 5/10/2017). This contradiction merely highlights how unreliable the traffic analysis is and why there should be a transparent review assisted by independent experts and a public report before any more approvals are given.

Infrastructure Australia compared predicted and actual traffic levels and found that the assumed steady growth in traffic did not occur. In Sydney, urban congestion levels are growing at around one third of the forecast rate. (See Figure 1, below)

#### **4.12 More specific problems**

What the modelling does show is traffic beyond capacity at The St Peters / Sydney Park Interchange, resulting in an overloading of the Mascot road network. Evidently traffic levels were notionally reduced to fit the modelling. 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. In Leichhardt, this includes severe traffic levels and increased congestion on Johnston St, and The Crescent (+80% ADT). The modelling shows significant increases in traffic on Victoria Rd (+20% ADT) which is already at capacity.

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

WAG considers these impacts as unacceptable. There must be a form of public policy that does not deliberately set out to downgrade the environment of thousands of people. This will also worsen conditions for freight and business.

As stated above the proponent excludes the impact of the Western Sydney Airport from analysis of the project. This could have a significant impact on traffic volumes and in turn, affect the financial viability of the project.

The project would have significant impacts on the streets near on- and off-ramps. Traffic congestion can be expected where traffic has to merge, for example in Euston Rd which will go from 6-4 lanes in fewer than 4 blocks from the St Peters Interchange exits. Modelling shows that the Anzac Bridge will have 60% more traffic in 2033 because of the project. This is absurd and it is difficult to see how any serious transport planner could see this as a solution. It is simply a recipe for more road building contracts in the future.

As noted above, the EIS finds that the project would cause additional traffic congestion on a number of key roads including: Gardeners Road and Bourke Road in the south, Frederick Street (Ashfield), Johnston Street (Annandale) and numerous streets in Mascot (p.8-103). While the need for future upgrade work is acknowledged, the costs of this traffic congestion and the costs of more road building have not been factored into the conclusions of the Social and Economic Impact report.

#### **4.13 Insufficient consideration of toll avoidance**

Reports prepared for investors have already acknowledged that toll avoidance may be greater than acknowledged in the EIS. Already the traffic on the M4 widening shows that it may not meet earlier EIS predictions. Cost of living pressures have increased and people may be more likely to avoid the tolls than predicted by previous research. The NSW government may have underestimated that anger at the inequity of motorists using the widened M4 being expected to pay for roads mostly used by others.

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. This does not meet the requirement. It simply shows that AECOM, the authors of the issue, did not consider it part of their job to assess the issue of toll avoidance. The economic and social impact of toll avoidance should also have been more thoroughly considered in the Social and Impact report.





## **5. Air Quality**

WAG objects to the M4-M5 Link as outlined in the Environmental Impact Statement. Our objection is partly based on my concern about the impacts of the project on air quality in the areas surrounding the tunnel portals and the use of unfiltered stacks.

This proposal involves unacceptable risks to public health. We call on the Minister for Planning to reject the M4-M5 Link as proposed.

The findings of the EIS on air quality cannot be relied upon. They are totally dependent on the traffic figures which have been questioned by independent experts. Traffic modellers have a long record of poor predictions in Australia and elsewhere.

### **5.1 Costs of Air pollution**

The health costs of outdoor air pollution in Australia are up to \$8.4 billion a year. The health costs of particulate pollution in the Sydney Greater Metropolitan Area is around \$4.7 billion a year.

The project will not solve traffic congestion, it will in fact encourage the use of cars and trucks in Sydney and dot inner Sydney with unfiltered pollution stacks. This will all add to health costs. NSW should be seeking to lower pollution levels as much as possible but pursuing sustainable transport alternatives.

### **5.2 No Safe levels of PM 2.5**

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.

### **5.3 Unfiltered pollution stacks pose unacceptable risk to Sydney's residents**

We completely reject the notion that unfiltered pollution stacks should be built anywhere in Sydney, let alone three or four in a single area as is proposed for the Rozelle Interchange.

We are particularly concerned that schools would be near such unfiltered stacks. The EIS states, there are at least 5 schools that will be in the orbit of these poisonous fumes. Children and the elderly are most at risk of lung ailments. The Education Minister (and former Planning Minister) Rob Stokes declared in 2017, that "No ventilation shafts will be built near any school." in his electorate. The same should be applied in all areas of Sydney and the government needs to urgently review its policy of support for unfiltered stacks.

The government needs to urgently review its policy of support for unfiltered stacks.

Annandale, Haberfield, Rozelle, Lilyfield and St Peters will be exposed to unacceptable health risks. With four unfiltered emissions stacks in Rozelle, two in Haberfield (one each for the M4 East







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.

The Rozelle interchange is only a concept at this stage and should not be approved. But even as a concept, its dangers are revealed. Rozelle would be lumbered by an unprecedented concentration of stacks, in a valley, adjacent to densely populated suburbs. The interchange has long climbs which will increase emissions concentrations, which will then be pumped into the surrounding area.

The EIS shows significant traffic volumes will head 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, but the model does not account for these conditions.

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 as the Rozelle Rail Yards are in a valley and 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. The area near the junction of Annandale and Weynton streets in Annandale has an elevation of 29 meters.

All these areas are in close proximity to these stacks and as a result, all the pollution from these stacks will almost be on the same level and so will be blowing almost directly into these properties, especially in summer when many windows are open. This is completely unacceptable.

In addition, when there is no wind, the pollution will accumulate in this valley area and make the surrounding area highly polluted. This is also not acceptable. Young children, the elderly and those suffering from lung and heart disease will be placed at serious risk. There are also at least 4 schools of primary age children well within one kilometre of these stacks. Young children are the most vulnerable to pollution related disease.

The additional unfiltered exhaust stack on the north-west corner of the St Peters 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.

St Peter's Primary School (and Community Pre-School for 3-6 year olds) 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 and near congested roads. This is utterly unacceptable.

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 will be complicated by emissions stacks located in the Interchange – meaning that pollution from the interchange will be supercharged by the emissions from the stacks.



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The EIS 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.”

Details of the impacts on air quality need to be provided in an accessible way so that the residents and experts can meaningfully comment on the impacts. Even small increases in PM 2.5 are not acceptable.

We are completely opposed to approving a project in which the EIS consultants recommend rather than filtrating stacks now, extra stacks could be added later if there is a problem? How long would that take? Twenty years until a cancer cluster developed? One of two RMS experts at an EIS session did not even know that this statement was in the EIS. Where would these stacks be built? This indicates a level of uncertainty about the safety of unfiltered stacks.

RMS has stated at EIS sessions that there will be a review of the government’s policy on unfiltered stacks but was unable to provide any information about the review or the identity of the person doing the review.

#### **5.4 Air quality danger in tunnels**

The EIS shows a diagrammatic explanation of the way the polluted air will be expelled from the Westconnex tunnels. This method will work on straight tunnels of short distance providing there is no traffic congestion.

Existing tunnels in Sydney have already have signs advising motorists to roll up their windows and put on their ‘in vehicle circulating’ air conditioning. However, this type of straight line pollution expulsion doesn’t work if the tunnels go around corners, which is the case with the tunnels from the Rozelle Rail Yards site.

We demand that NSW Planning respond to this specific concern, rather ignoring it as has occurred with responses to the EIS for the M4 East and New M5 projects.

The tunnels under Rozelle/Lilyfield are going to be in three levels. The EIS of the Rozelle Interchange are nothing more than a concept design and must not be approved. The EIS does not explain what safety procedures would be built into the project to deal with situations like serious congestion, accidents or fire.

In the event of 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. However, there is no substantive detail about how these issues are going to be addressed and it is simply not acceptable for the EIS to continually state that issues will be postponed to the design phase.

There needs to be independent scrutiny and public feedback and consultation into a project carrying such potential risks to the public.

Government should seek sustainable strategies to reduce air pollution not worsen it in chosen spots





Rather than adding to pollution, the NSW government should be seeking ways to reduce emissions. It is not acceptable to argue that worsening pollution is not a problem in particular spots, simply because it is already poor.

The M4-M5 tunnel will increase PM10 levels on the following Streets in the St Peters area and near Sydney Fish Market (data from WestConnex EIS) when it is opened in 2023. PM10 is a carcinogen and a paper published in 2013 (Raaschou-Nielsen et. al. 2013), which involved 312 944 cohort members, linked increases in PM10 levels with increases in lung cancer rates. The increases in PM 10 concentration is completely unacceptable, some of these areas are residential or are people's workplaces.

<u>Location</u>	<u>Increase in PM10 (µg/m3)</u>
Active Kids Mascot	0.4
Burrows Road	0.5-1, around 2 in some areas
Gardner Street	2-3
Kent Road	0.5-1
Bourke Street	0.5-1
Oridon Street	0.5-1
Botany Road	0.5-1
Albert Street	0.5-1
Victoria Street	0.5-1
Euston Road	0.5-1
Princess Highway SW of Sydney Park	NA
Ada Place	0.5-1
Harris Street	0.5-1
Western Distributor (Sydney Fish Market)	2-3
Saunders Street (Near Western Distributor, Sydney Fish Market)	0.5-1
Bank Street (Near Western Distributor, Sydney Fish Market)	0.5-2
Harris Street (between Milers Street and Allen Street, near Sydney Fish Market)	0.5
Bulwara Road (Sydney Fish Market)	0.5-3
Pymont Bridge Road (between Harris Street and Western Distributor)	0.5-3
Sydney Fish Market	0.5-1

Source: M4-M5 EIS\_Vol 2C \_Part B\_\_App I Air quality \_Annexures\_\_part 4.pdf pg K70

Air pollution on surface roads near portals will be worse

The EIS acknowledges that air pollution will be worse on surface roads near the tollway portals in 2023 when the project is finished and a decade later in 2033. It also acknowledges that construction traffic can pose a pollution risk.

The EIS describes the additional pollution in these terms: a 'small increase in pollutant concentrations' on surface roads near portals compared to existing conditions." In other words, the EIS acknowledges that some residents will be left worse off after the project.

The EIS also 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 strongly disagree that the potential impacts on human health are 'acceptable' and object to the project in its entirety because of these impacts. Those who have time to access the full EIS will discover that concentrations of some pollutants PM5 and PM10 are already near the current standard and in excess of proposed standards (9-81, 9-93). 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. WAG is opposed to a project that will have an anticipated result of leaving some residents exposed to exceedances of safe standards of air pollution.

It is not an answer to say that some people will be exposed to less air pollution. If people are currently exposed to unsafe levels of pollution, it is the job of government to take active steps to lower pollution where these residents live rather than exposing others to harm.

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. Since this information is not provided, this EIS should be rejected.

### **5.5 EIS ignores impact of ozone emitted in Eastern Sydney on the West of Sydney**

The EIS states that the impact on regional air quality is minimal. It 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).

The Office of Environment and Heritage (OEH) needs to provide information about the value of this standard and on the impact of new motorways on that level. This should be required to be included in the EIS.

### **5.6 Unreliability of data and lack of clarity**

The air quality data provided in the EIS 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.

We do not believe that the air quality studies are reliable as they are dependent on the traffic studies which are fundamentally flawed and have not included sufficient modelling of impacts on local roads.





We believe the EIS underestimates the traffic and therefore the pollution on local roads. It also fails to take sufficient account of impacts on residents at Haberfield and St Peters who after living with years of construction emissions and dust will then be exposed to traffic near the portals.

Both the traffic studies and the air quality studies should be independently assessed and verified before any approval of this project. The review should be public and itself open to public submissions.

The EIS predicts that overall air quality will be improved by 2033 by the with the motorway in place in comparison to a scenario with no motorway, though it does acknowledge that some localities will suffer worse air quality. It also states that even in the areas that will see increases (including within the tunnels and around exhaust stacks), the air quality will still be below national criteria. The predictions are based on four seriously flawed assumptions:

- It overlooks alternative public transport solutions to Sydney's transport problems that involve far less air pollution.
- It relies on traffic modelling that is highly dubious (finding that overall traffic movement will be reduced compared to the do nothing scenario).
- It assumes that pollution emissions per vehicle will fall in the future as a result of tightening regulations and technological improvements.
- It assumes that the current national criteria are actually safe for human health. In fact, there is no safe level of particulates.

## **5.7 Alternative transport solutions**

Mass transport systems such as rail and bus produce far fewer pollutants both because less energy is required per passenger and because they make use of less polluting power supplies (electric in the case of trains and electric/gas/hybrid in the case of buses). It is a whitewash to present air quality scenarios without a public transport based solution.

## **5.8 Vehicle use modelling**

Vehicle use modelling is known to be fraught, and modelling for most recent motorway projects in Australia has been seriously inaccurate. One of the main problems is inadequate consideration of 'induced demand', whereby, to quote the EIS: "Even with no growth in regional population and/or economic activity, a new or substantially upgraded road has the potential to induce changes in travel patterns, which appear as induced traffic demand". This is the main reason that new roads eventually become clogged. When congestion is eased by a new road, people will take more trips, and this will increase until the congestion becomes the same as it was before the road was built. However, the modelling used for the M4-M5 link assumes this effect will increase traffic loads by only 0.3%. This is counter to the experience of major road building in every country around the world. This oversight means that the vehicle use may be far higher than projected. Presumably by 2033 the roads will be at full capacity, which by back of the envelope calculation could be >200,000 vehicles per day in the M4-M5 tunnel, or double the prediction in the EIS. This level of vehicle use has not been modelled for air-quality and without doing so, it would be very difficult to assess the impact within the tunnels or in the surrounding suburbs. However, given that the EIS







predictions are close to the air quality criteria in some locations, frequent exceedance of the criteria must be quite likely.

### **5.9 Per vehicle emissions will fall**

The EIS cites recent data to argue that air quality in Sydney has improved in recent decades, in part due to reduced emissions from vehicles. They also cite studies that predict this trend will continue. While this may be a reasonable assumption, there is a reasonable possibility that the improvements will not occur. The EIS should have modelled the air quality under these circumstances.

### **5.10 National air quality criteria are safe**

We note that the EIS predicts pollution levels to be lower than current air quality criteria for NSW, and also that several studies into the impacts of Sydney's existing road tunnel network conclude that they are lower than the criteria. However, state, national and international guidelines and criteria for safe levels of pollutants have changed over the decades as knowledge about the impacts of the pollutants has improved. The changes have always been to lower the criteria. Take the example of particulate matter (particularly prevalent in diesel emissions). Health authorities recognise that there is no safe level of particulates, partly because they can cause cancer and as such just one particle may be enough to kill somebody. It is likely that criteria will be tightened further in the future and then the EIS predictions that appear under current criteria to be a modest and safe deterioration in air quality may one day be judged to be a public health disaster.

The trend in tightening air-quality regulations also invalidates the logic in modelling reducing vehicle emissions (issue 3 above). Vehicle emissions will only fall if health authorities keep reducing the air quality criteria. If they are going to reduce the air quality criteria, it is misleading to base future predictions on current criteria. In other words, the scenarios should either test current per vehicle emissions against current criteria or test forecast reductions in emissions against forecast criteria (or do both).

The EIS predicts a minimal impact on air quality but this may be very far from the truth. In particular, the lack of accuracy in predicting the actual number of vehicles, the general lack of knowledge of the health impacts of the pollutants and the lack of consideration of alternative transport solutions with far better air quality outcomes are serious flaws in the EIS process.



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## 6. Other Environmental Impacts

### 6.1 Greenhouse Gases

The Green House Gas (GHG) assessment for Stage 3 is based on the WestConnex Road Traffic Model version 2.3 (WRTM v2.3). This model which was developed by NSW Roads and Maritime Services has major flaws. The unreliable outputs of the model put into question the GHG assessment.

The assessment states that there will be a net increase in GHG emissions in 2023 under the 'with project' scenario, but under the 2023 'cumulative' scenario when construction is completed, there will be a net decrease in emissions (page 22-15). However, as the 'cumulative' scenario includes the Sydney Gateway and Western Harbour Tunnel projects, which are neither planned let alone approved, the 'with project' scenario should be considered as a likely outcome – which would see an increase in emissions.

Both scenarios for 2033 show a reduction in emissions vs the 'do minimum' scenario. This is likely to rely on 'free-flow' conditions for the Project for most of the day. Should this not occur, the modelled outcomes could be significantly different.

Emissions were not modelled beyond 2033. This is a mistake, as the contractual life of the project is significantly longer, until 2060. The EIS states, on page 22-15 that 'it is expected that savings in emissions from improved road performance would reduce over time as traffic volumes increase'. Therefore, the longer-term outcome of the project is likely to be an increase in GHG emissions

Targets for renewable energy and carbon offsets are not aligned with NSW government policy. (Table 22-8). Targets for renewable energy and offsets are unclear.

No project should be allowed to proceed that so inadequately failed to respond to the global threat of climate change. All projects should be required to demonstrate how they will contribute to climate change

### 6.2 Flooding and Drainage

At the western end of Bignell Lane near Pyrmont Bridge Road in Camperdown 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. For this reason We do not consider this to be an appropriate site for a dive site and urge NSW Planning to reject this option.

Darley Road and adjacent streets such as Hubert St are exposed to flood. The flood impact could be exacerbated by the disruption or blockage of existing drainage networks, which are risks identified in the EIS. The EIS has not assessed whether the identified risk to the existing drainage network will cause increased risk of flood damage to flood lots and it fails to take account of the Inner West Council's Leichhardt Floodplain Risk Management Plan which contains recommended





flood modification options. The EIS has not assessed whether its drainage infrastructure will impede the Inner West Council's Leichhardt Floodplain Risk Management Plan option HC\_FM3 to lay additional pipes/culverts from Elswick Street to Hawthorne Canal (via Regent Street and Darley Road). RMS has not assessed whether its drainage infrastructure will impede Inner West Council's Leichhardt Floodplain Risk Management Plan option HC\_FM4 to lay additional pipes/ culverts from William Street to Hawthorne Canal via Hubert Street and Darley Road. The EIS should not be approved as it has not properly explained or assessed these impacts.

### **6.3 Soil and Water Quality**

We object to the impacts of this project on water quality in an enclosed body of water within Sydney Harbour in a highly densely populated area. The proposal involves unacceptable risks to water quality and public health, and call on the Minister for Planning to reject the M4-M5 Link as proposed.

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.

Plan option HC\_FM4 to lay additional pipes/ culverts from William Street to Hawthorne Canal via Hubert Street and Darley Road. The EIS should not be approved as it has not properly explained or assessed these impacts.

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.

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.





## 7. Heritage

The project directly affects 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)

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 congestion. 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.

We 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 may have value but this value should not be used to justify or permit the removal of buildings. The experience to date is that items removed from buildings may be salvaged but their original context is lost and seldom documented in a way that is readily accessible to the public or the new private owners (in the case of items made available to claim). The documentation of heritage buildings or other features, small and large, required by the previous stages' EIS's has been more or less adequate but there is no information about where or how long this documentation will be maintained so the public has any access to it. No plans for the display or incorporation into local structures of certain items saved, which were hinted at in the EIS for Stage 2 conditions of approval, have been made known to the public. Control and management of the removal of items identified by the heritage cataloguing of houses in Campbell Street, St Peters for example was lacking so items were damaged or utterly destroyed in the absence of expert supervision. The sketchy coverage given in this EIS does not encourage any hope the practices will be better in this stage of the project.

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 M4/M5 tunnel would further add to this loss. We 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.

We 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. We do not agree with trashing industrial history when





it could be put to good community use. The anger about the loss of the Rudders building in Campbell Rd on the northern edge of the Alexandria landfill has not dispelled.

Easton Park has a long history and is part of an urban environment which is unusual in Sydney. The park needs to be assessed from a visual design point of view. It will be quite a different park when its view is changed to one of a large ventilation stack. The suggestion that it has been 'saved' needs to be considered in the light of the severe 5 years construction impacts and the reshaped urban environment.

We oppose the removal of more Homes of Significance in either Haberfield or Ashfield. The level of destruction has already been appalling. Residents were led to expect that there would be no further construction impacts after the completion of the M4 East. The loss of further homes will cause further distress within this community.

We also 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. 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.

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.

The EIS admits that it is not even known what excavation would be undertaken at the White Bay Power station. We are particularly concerned about the old water channels and the southern penstock which are part of Sydney's industrial heritage. How could an EIS for such a major project be put forward on this basis? It is fatuous to state that "physical and indirect impacts on this heritage element should be avoided" and suggest that a future plan should be done. Why isn't the need for excavation known? This raises great concerns about the 'indicative only' nature of the work that has been done before this EIS. Why is there such a rush? This EIS is not complete and should be rejected for that reason alone.

WestCONnex Action Group  
16 October 2017



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**From:** [REDACTED]  
**Sent:** Mon, 16 Oct 2017 12:50:18 +0000  
**To:** [REDACTED]  
**Subject:** FW: Submission Details for Ed Germain (object)  
**Attachments:** 228389\_WestConnex M4-M5 Link EIS Submission\_Rozelle Resident\_2017Oct16\_2349.pdf

**From:** system@accelo.com On Behalf Of Ed Germain  
**Sent:** Monday, 16 October 2017 11:50:07 PM (UTC+10:00) Canberra, Melbourne, Sydney  
**To:** [REDACTED]  
**Subject:** Submission Details for Ed Germain (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Ed Germain  
[REDACTED]

Address:  
[REDACTED]

Rozelle, NSW  
2039

Content:  
Attached.

[REDACTED]  
Submission: Online Submission from Ed Germain (object)  
[https://majorprojects.accelo.com/?action=view\\_activity&id=228389](https://majorprojects.accelo.com/?action=view_activity&id=228389)

Submission for Job: #7485 WestConnex M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)

# **WestConnex: M4-M5 Link Environmental Impact Statement**

## **Submission – Rozelle resident**

### Introduction

Thank you for allowing the opportunity to comment on the EIS.

I believe Westconnex is an appalling value proposition for the people of NSW. I would be far more accepting of the public and personal impacts of a \$20 billion public transport portfolio.

I acknowledge that the EIS has made some effort to address community concerns. Thank you.

Below are some comments that are important to me and the community I live in.

### About me and my family

- I live with my family in Quirk St, Rozelle.
- My children attend Rozelle Public School. They walk to school.
- Our preference is to walk/cycle for local excursions.
- I cycle to and from work (in the city centre) approximately 220 days per year.
- We make extensive use of public green space (and especially Easton Park).

### Concerns

#### **1. Increased pollution [Page (xii)]**

I am extremely concerned by the predicted level of pollutants. Rozelle will be subject to the “perfect storm” of pollution sources i.e.

- a) the combination of accumulated pollution from kilometres of tunnel via 3 new unfiltered stacks;
- b) additional surface traffic;
- c) increased idling time due to worsened congestion;
- d) add the above to an area with some of Sydney’s worst air quality.

My family as members of the Rozelle community will be exposed to the heightened risks of premature death and years of life lost as detailed in the NSW EPA recent Clean Air Consultation Paper (p10).

Ventilation stacks should be filtered and ongoing air quality monitoring should be carried out in peak exposure locations and made available to the public.

#### **2. Increased congestion [Page (xi), 3-19, 8-126]**

Your forecasts show increased congestion at the Anzac Bridge, City Westlink, and Victoria Rd Drummoyne. Traffic modeling also shows slower travel times into the city!

So, the residents of Rozelle will live in the perfect pollution storm, and experience worse travel times into the city! This project is doing nothing to alleviate Sydney's traffic issues. How about some fixed capacity high speed public transport instead of a toll way? Build it and they will reassign!

### **3. No commitment for contractors [Page (iv), 6-3]**

What governance is in place to ensure contractors deliver on the intentions/design in the EIS?

What charter will guarantee the delivery of green space and adherence to a below-ground interchange design?

I am very concerned that some of the concessions won by public pressure that will help minimise the impacts of this ugly project, are diluted or not delivered.

### **4. Dust and disturbance of contaminated soils [Pages xii, xx]**

I am very concerned that in addition to the increased pollutants we will potentially be subject to increased dust and potentially airborne hazardous materials resulting from excavation and demolition (such as asbestos).

### **5. Visual Amenity of cut-and-cover infrastructure [Page 6-27]**

Could you please have some consideration for the visual amenity of portals and tunnels. Just a little design effort could make the world of difference in a historic and beautiful area of Sydney.

### **6. Active transport options from Rozelle to the city centre [Page 6-79]**

I am happy to see that an alternative pedestrian/cyclist route will be implemented prior to demolishing the Victoria Rd overpass.



**From:** [REDACTED]  
**Sent:** Mon, 16 Oct 2017 11:44:27 +0000  
**To:** [REDACTED]  
**Subject:** FW: Submission Details for Dirk Notelaers (object)  
**Attachments:** 228363\_Westconnex EIS response DN Oct 17\_2017Oct16\_2243.pdf

**From:** system@accelo.com On Behalf Of Dirk Notelaers  
**Sent:** Monday, 16 October 2017 10:44:10 PM (UTC+10:00) Canberra, Melbourne, Sydney  
**To:** [REDACTED]  
**Subject:** Submission Details for Dirk Notelaers (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Dirk Notelaers  
[REDACTED]

Address:  
[REDACTED]

Haberfield, NSW  
2045

Content:  
 Only a person with no conscience would consider doing this 200m from a school.

To use Duncan Gay's words "there is no way in hell that we will be putting infrastructure next to schools that increase pollution to those schools".

If that is what he wants for his backyard, why should mine be treated differently?

[REDACTED]  
 Submission: Online Submission from Dirk Notelaers (object)  
[https://majorprojects.accelo.com/?action=view\\_activity&id=228363](https://majorprojects.accelo.com/?action=view_activity&id=228363)

Submission for Job: #7485 WestConnex M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)

**Kingston St,**

**Haberfield,**

**NSW, 2045**

**October 15, 2017**

**Submission to the M4-M5 Link EIS (SSI 16\_7485)**

I am writing to object to the M4-M5 Link development plans as outlined in the EIS. Haberfield has had enough disruption to the community during the Westconnex/M4 East extension project. The NSW Government and SMC committed that stages subsequent to the M4 East extension would not be above ground, and yet the EIS shows that we are going to be subjected to disruption, noise, dust, contamination, excessive parking in our residential streets and additional rat runs through our normally quiet suburb for at least another 4 years. This is unacceptable.

I particularly oppose the proposed plan to have a drilling site and car parking as outlined in the Option B. I have two children who attend Haberfield Public School. It is unconscionable that the government believes it is acceptable to have such work going on within 200m of our school. Our children are growing and are meant to be able to go out and run around during break times. I do not understand how they will be able to continue to enjoy this part of their school routine when there will be excessive dust, likely contaminated with asbestos, lead, benzoates drifting through the air as a result of the drilling within 200m from the school. I wonder whether the planning minister would find it acceptable to have their own child subjected to such environmental conditions. I know from the dust generated during the M4 east project that the watering down and dust mitigation measures are completely inadequate, and with the risk of drilling at the Muirs site, and the risk of contamination, this risk is even higher.

As listed in Appendix Q, a large number of potentially dangerous contaminants are likely to be found at these sites, including asbestos, lead, metals, benzene and pesticides. It is deplorable to establish a construction site on a former caryard that will contain decades of dangerous waste and contaminants, just metres from a primary school, when other less-contaminated and already-utilised sites exist.

Project Director Peter Jones acknowledged at the school information night on 11 October 2017 that it is highly likely that a car yard and car service yard would have dumped contaminating material on site in the past and that the construction crews are likely to find asbestos. The class action law suit in 20 years' time if our children are dying from cancer and respiratory disease will be no consolation if the decision makers recklessly disregard community safety now.

Table 9-16 in the EIS (Chapter 9) shows that Option B carries a much greater potential to release dust and other pollutants into the air than Option A, especially in relation to the demolition and earthworks stages. Table 9-18 shows that the number of receptors affected by Option B is also considerably higher than Option A.

The plans will cause significant detrimental effects for our children's health, safety and learning environment and for our community. This plan will significantly increase the risk of respiratory illness in our children.

Option B is unacceptable due to the adverse impact on the safety, health and well being of our children. The additional noise, dust, vibration, truck movements are unacceptable levels of risk which our children should not be subjected to.

Option B introduces unacceptable level of risk from the additional traffic which will be around the school, large trucks, and additional workers parking on the streets, taking up space around the school. We have already had to put up with inconsiderate parking, and excessive levels of traffic in and around Bland St, which make it very unsafe to walk to school. In addition to the safety concerns generated by the traffic changes roads around the school, Option B will significantly increase traffic congestion around the school. This will be particularly on Bland St but we would expect this to impact surrounding roads as well. This will significantly disrupt parents and teachers who need to drive to school.

It is unacceptable, unsafe and lacking in common sense to locate construction sites that produce 170 daily heavy vehicle movements (140 at Parramatta Road West/30 at Parramatta Road East) and 160 daily light vehicle movements (10/150) only 200m from a primary school, on one of the primary routes families use to get to school on foot or in cars.

Under Option B, there is a proposal for 24 hours a day, 7 days a week operation. This means there will be additional noise which will significantly disrupt teaching, and impact the usability of the playground for teaching and play.

I urge SMC and the Planning Minister and Department to reject the option that will have the greatest adverse impact on air quality and is the closest to a school, where young children with still-maturing respiratory systems spend at least six hours of each day.

I am also concerned that the SMC and Planning Minister are still not taking any action in implementing filtration in the ventilation stacks. This is completely unbelievable. There are billions of dollars of public money being spent on the building of this road, yet the government can't afford to implement world's best practice filtration to limit the level of toxic vehicle emissions being released into the atmosphere and into the local community, and in particular to be breathed in by young growing children who will be less than 500m from these emission stacks.

I urge the Secretary of NSW Planning to advise the Minister to reject this EIS, and provide a written response to each of the objections I have raised.

Regards

Dirk Notelaers



**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: Daniel Goodacre

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: 64 Reiby st

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

- Rozelle is an old and historic suburb 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.
- There is no evidence of scenario modelling being used to allow testing the ability of different packages of integrated transport measures to achieve outcomes. The Long Term Transport Masterplan states that integrated approaches are required to manage congestion. The NSW Minister for Transport claims that we "have to get more people on public transport."
- Night works – Leichhardt. The EIS states that to minimize disruptions to traffic on the existing road network (including in peak hours) there will be night works where appropriate. Given the congested nature of Darley Road, it is likely there will be frequent night work (EIS, 6.4). This will create an unacceptable impact in residents. It is unacceptable that a highly unsuitable site has been selected. And, instead of a proper plan to manage traffic, the EIS contemplate work simply occurring at night. This is objected to in the strongest terms.
- The EIS at 7-41 acknowledges that there is great concern in the community that King Street, Newtown, will be made a 24 hour clearway, stating "Roads and Maritime has no plan to change the existing clearways on King Street". This statement is deliberately misleading - it infers that SMC has authority in controlling impacts on regional roads. Roads and Maritime have the unfettered right to declare Clearways wherever and whenever they wish, and RMS has **NEVER** stated publicly that King Street will not be subject to extended clearway.
- 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.
- 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.

**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 \_\_\_\_\_

**From:** Lisa Grenfell <campaigns@good.do>  
**Sent:** Saturday, 14 October 2017 5:36 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.

## SUBMISSION OF OBJECTION TO WESTCONNEX M4/M5 LINK EIS.

I strongly object to this proposal in its entirety 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. NSW Planning must reject this EIS and instead recommend to the NSW government that there should be an independent review of WestConnex before more billions are spent and more residents' lives are damaged.

The EIS is based on an indicative design and has insufficient detail for the impacts to be properly assessed and addressed, and the public consultation has been woefully inadequate.

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. This means the community will have limited say in the management of the impacts identified in the EIS. The EIS needs to provide an opportunity for the community to meaningfully input into this report and approval conditions.

As a parent of a child starting kindy at Rozelle Public School, I strongly object to the indicative design for the Rozelle Interchange and have deep concerns regarding its health and other impacts on my child. 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.

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 and also be greatly increased if Stage 3 were ever completed. It states that Stage 3 would 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. 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 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.

The EIS states, there are at least 5 schools that will be in the orbit of these poisonous fumes. Children and the elderly are most at risk of lung ailments. The Education Minister Rob Stokes declared in 2017, that "No ventilation shafts will be built near any school." in his electorate. The same should be applied in all areas of Sydney and the government needs to urgently review its policy of support for unfiltered stacks.

I object to the use of Darley Rd, Leichhardt as a drive 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 and anyone who have driven there knows, 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 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. 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. An EIS based on inaccurate traffic analysis cannot be approved.

The economic basis for this project is the approval of further toll roads. Throughout the EIS there are references to the f6 and Northern beaches Link; it is assumed that these toll roads will, in fact, be built. The issue with this is that the impacts set out in the EIS rely upon them being built – that is, traffic will lessen once they are built. However, there is no certainty this will occur.. Any references to these toll roads, in the context of impacts from this project, need therefore to be disregarded.

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.

We are 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.

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.

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.

The Environmental Impact Statement for Stage 3 admits that the traffic around St Peters will be worse when both stages are completed. So the community would have to put up with the exhaust from tunnels and 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.

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.



During the Stage one consultation phase, residents were repeatedly told that after construction of the M4 East, there would be no more above ground construction in Haberfield. It now appears that they were misled. SMC is already preparing its Preferred Infrastructure Report which will include its final choice of option. I demand that this report be made public as soon as it is filed with NSW Planning and that residents be given a right to consultation on the actual plan before a determination on this EIS application is made by NSW Planning.

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 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 even notified of feedback sessions. 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'.

SMC was required to consider alternatives. This section in the EIS is tokenistic at best. The City of Sydney came up with a well thought out alternative plan and this has been ignored in the EIS.

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 objections I have raised.

Yours sincerely, Lisa Grenfell 21 Roseberry St, Balmain NSW 2041, Australia

\_\_\_\_\_ This email was sent by Lisa Grenfell 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 Lisa provided an email address (lpoisel@hotmail.com) which we included in the REPLY-TO field.

Please reply to Lisa Grenfell at lpoisel@hotmail.com.

To learn more about Do Gooder visit [www.dogooder.co](http://www.dogooder.co) To learn more about web protocol FC 3834 visit: [www.rfc-base.org/rfc-3834.html](http://www.rfc-base.org/rfc-3834.html)

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

**application number SSI 7485 – WestConnex M4-M5 Link**

I am writing in response to the EIS for the M4-M5 WestConnex Link. I strongly oppose the project. Specifically, I oppose:

**Lack of filtration and visual impact of the ventilation stacks:** It is unacceptable to propose unfiltered stacks for the Rozelle Rail Yards and Victoria Road near Terry Street (and indeed for the entire WestConnex project) given the lack of data on the cumulative impacts on air quality and proximity of these stacks to homes, schools, preschools and aged care facilities. All ventilation facilities must be fully filtered and have real-time monitoring. This is critical given Rozelle is already one of Sydney's most polluted areas. The cumulative impact of increased air pollution from general traffic and the White Bay Cruise Ship terminal including carcinogenic particulates would create significant and life threatening health conditions for our community.

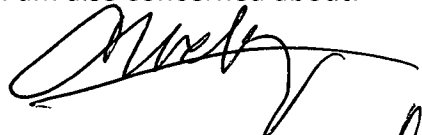

**Devastating impact of construction:** we have significant concerns including with regard to noise, dust, traffic and parking around all construction sites and the lack of respite for residents. Appropriate respite periods must be provided and construction should be limited to 7am-7pm to enable residents to sleep.


**Construction and operational traffic around the Rozelle interchange:** this will seriously impact residential amenity, pedestrian and cycle safety and the ability of residents to park.

**The significant increase of traffic on Anzac Bridge and The Crescent:** Anzac Bridge and The Crescent are already at capacity.

**Need to ensure on-going access to King George Park at all times during any construction and operation of the M4-M5 Iron Cove link**

I am also concerned about:

<b>Attention Director</b> <b>Infrastructure Projects, Planning Services,</b> <b>Department of Planning and Environment</b> <b>GPO Box 39, Sydney, NSW, 2001</b>	<b>Name:</b> <u>JASON MATTHEW</u>
<b>Application Number: SSI 7485</b>	<b>Address:</b> <u>21 DARTMOUTH CEN EMU PLAINS</u>
<b>Application Name: WestConnex M4-M5 Link</b>	<b>Suburb: Postcode</b> <u>2750</u>
<b>Signature:</b> 	
Please <b>include</b> my personal information when publishing this submission to your website <b>Declaration: I HAVE NOT</b> 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:

1. I object to this stage of WestConnex because it does not take the huge new tollways to Port Botany or Sydney Airport which were the main justification for the whole project. This is a fraud on the public.
2. All the benefits of Stage 3 outlined in the EIS are focused on the north-south connections to the northern beaches or the proposed new harbour tunnel, both additional projects. Why does the state government continue to say WestConnex is for the benefit of Western Sydney and why are western Sydney drivers sluggish with high tolls to pay for these other projects when it does not benefit them?
3. The money for this stage should be spent on upgrading the train service. This would really benefit the communities west of Parramatta. What commuters out west need most is an extension of the heavy rail train system. I object to the fact that we were never given a choice about it.
4. People travelling to work in Sydney city want a better and more frequent train service. Most people in Emu Plains, Penrith, Mt Druitt, or Blacktown who work in Sydney CBD use the trains. The alternatives – such as heavy rail extension – are not properly considered on the same basis as the government's preferred option, the WestConnex tollway project. This is a breach of the EIS process.
5. The state government has announced the sale of the project. There has been no public debate about this. I object to the privatization of the road system. How can the public interest in an efficient transport system be protected when the privatised system must operate for the benefit of shareholders?
6. 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 you pay the high tolls (capped at \$7.95 in 2015 dollars) or you drive for longer to avoid the tolls.
7. 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 ask that Planning not 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: Isabella Young

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: 98-100 Gowrie St

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

I. 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.

II. 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.

III. 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

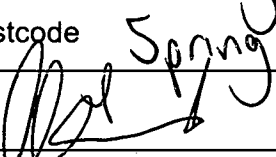
north-western corners of the interchange. This is utterly unacceptable.

IV. 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.

V. 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.

**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: <u>Andrew Wieczorek</u>
	Address: <u>2 Fairway Ave</u>
Application Number: SSI 7485	Suburb: Postcode <u>Springwood NSW 2777</u>
Application Name: WestConnex M4-M5 Link	Signature: 
Please <b>include</b> my personal information when publishing this submission to your website <b>Declaration:</b> I <b>HAVE NOT</b> 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?

I object to the whole WestConnex project because 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. Most world cities are building more public transport including fast trains but our government is building tollways.

I object to the length of time the tolls will be levied, 43 years, when the widened M4 will be paid for in 2 years. The only reason is to guarantee income to a private motorway owner-operator. The fact that the toll is based on distance travelled disadvantages people who live on the western side of the Sydney region.

The KPMG and Ernst & Young studies cited by the EIS say NSW's toll roads contributed \$14 billion in benefits over ten years. These studies were paid for by Transurban which owns more tollways than any other corporation. Their findings are not independent, and no details of how they arrived at that conclusion are provided.

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

I object to the way this project is supposed to be for the benefit of western Sydney when the original reason for this stage of WestConnex, the "Sydney Gateway", to the airport and Port Botany is not even part of this project. In fact it will be a separately tolled route, another cost to the western Sydney road users.

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.

I object to this new tollway project because it will not reduce traffic, simply 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 the tolls don't seem to have anything to do with traffic management. This project should NOT be approved.

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**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 \_\_\_\_\_

<b>Attention Director</b> <b>Infrastructure Projects, Planning Services,</b> <b>Department of Planning and Environment</b> <b>GPO Box 39, Sydney, NSW, 2001</b>	<b>Name:</b> <i>KEEN RYAN</i>
	<b>Address:</b> <i>81 BROWN CT</i>
<b>Application Number:</b> SSI 7485	<b>Suburb:</b> <i>PENRITH</i> <b>Postcode</b>
<b>Application Name:</b> WestConnex M4-M5 Link	<b>Signature:</b> <i>[Signature]</i>
Please <b>include</b> my personal information when publishing this submission to your website <b>Declaration:</b> I <b>HAVE NOT</b> 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:

1. I object to this stage of WestConnex because it does not take the huge new tollways to Port Botany or Sydney Airport which were the main justification for the whole project. This is a fraud on the public.
2. All the benefits of Stage 3 outlined in the EIS are focused on the north-south connections to the northern beaches or the proposed new harbour tunnel, both additional projects. Why does the state government continue to say WestConnex is for the benefit of Western Sydney and why are western Sydney drivers sluggish with high tolls to pay for these other projects when it does not benefit them?
3. The money for this stage should be spent on upgrading the train service. This would really benefit the communities west of Parramatta. What commuters out west need most is an extension of the heavy rail train system. I object to the fact that we were never given a choice about it.
4. People travelling to work in Sydney city want a better and more frequent train service. Most people in Emu Plains, Penrith, Mt Druitt, or Blacktown who work in Sydney CBD use the trains. The alternatives – such as heavy rail extension – are not properly considered on the same basis as the government's preferred option, the WestConnex tollway project. This is a breach of the EIS process.
5. The state government has announced the sale of the project. There has been no public debate about this. I object to the privatization of the road system. How can the public interest in an efficient transport system be protected when the privatised system must operate for the benefit of shareholders?
6. 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 you pay the high tolls (capped at \$7.95 in 2015 dollars) or you drive for longer to avoid the tolls.
7. 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 ask that Planning not approve this project.

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Name \_\_\_\_\_ Email \_\_\_\_\_ Mobile \_\_\_\_\_



<b>Attention Director</b> <b>Infrastructure Projects, Planning Services,</b> <b>Department of Planning and Environment</b> <b>GPO Box 39, Sydney, NSW, 2001</b>	<b>Name:</b> B. Burton
<b>Application Number:</b> SSI 7485	<b>Address:</b> 147-151 Parkriver Close
<b>Application Name:</b> WestConnex M4-M5 Link	<b>Suburb:</b> Postcode Mulgoa
Please <b>include</b> my personal information when publishing this submission to your website <b>Declaration:</b> I <b>HAVE NOT</b> 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.

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Name \_\_\_\_\_ Email \_\_\_\_\_ Mobile \_\_\_\_\_

<b>Attention Director</b> <b>Infrastructure Projects, Planning Services,</b> <b>Department of Planning and Environment</b> <b>GPO Box 39, Sydney, NSW, 2001</b>	<b>Name:</b> Keith Paton
<b>Application Number:</b> SSI 7485	<b>Address:</b> 25 Shellbourne Place
<b>Application Name:</b> WestConnex M4-M5 Link	<b>Suburb:</b> Postcode
Please <b>include</b> my personal information when publishing this submission to your website. <b>Declaration:</b> I <b>HAVE NOT</b> 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?

I object to the whole WestConnex project because 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. Most world cities are building more public transport including fast trains but our government is building tollways.

I object to the length of time the tolls will be levied, 43 years, when the widened M4 will be paid for in 2 years. The only reason is to guarantee income to a private motorway owner-operator. The fact that the toll is based on distance travelled disadvantages people who live on the western side of the Sydney region.

The KPMG and Ernst & Young studies cited by the EIS say NSW's toll roads contributed \$14 billion in benefits over ten years. These studies were paid for by Transurban which owns more tollways than any other corporation. Their findings are not independent, and no details of how they arrived at that conclusion are provided.

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

I object to the way this project is supposed to be for the benefit of western Sydney when the original reason for this stage of WestConnex, the "Sydney Gateway", to the airport and Port Botany is not even part of this project. In fact it will be a separately tolled route, another cost to the western Sydney road users.

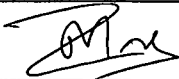
Because of the high tolls drivers who have to travel east daily will look for alternative routes and build up the traffic on local roads, both here in western Sydney, on Parramatta Rd and all the way to the city. There is no way the WestConnex roads will reduce traffic on un-tolled roads with tolls on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

I object to this new tollway project because it will not reduce traffic, simply 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 the tolls don't seem to have anything to do with traffic management. This project should NOT be approved.

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Name \_\_\_\_\_ Email \_\_\_\_\_ Mobile \_\_\_\_\_

<b>Attention Director</b> <b>Infrastructure Projects, Planning Services,</b> <b>Department of Planning and Environment</b> <b>GPO Box 39, Sydney, NSW, 2001</b>	<b>Name:</b> <u>Mario Ross</u>
	<b>Address:</b> <u>5, Burton St, Werrington</u> <u>County</u>
<b>Application Number:</b> <u>SSI 7485</u>	<b>Suburb: Postcode</b> <u>2747</u>
<b>Application Name:</b> <u>WestConnex M4-M5 Link</u>	<b>Signature:</b> 
Please <b>include</b> my personal information when publishing this submission to your website <b>Declaration:</b> I <b>HAVE NOT</b> 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 Stage 3 of WestConnex, the M4-M5 Link project because it will not reduce traffic, simply move it around. If the government was 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 the tolls don't seem to have anything to do with traffic management.

I object to the proposal that the already 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. 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.

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. How is the public interest in an efficient transport system to be protected when so much of road system operates to make a profit for shareholders?

The EIS admits that the people who live in western Sydney on average have lower incomes than in the inner suburbs and that the tolls will therefore be a heavier burden in Emu Plains, Penrith, Mt Druitt, Blacktown or Wetherill Park than in Strathfield or Padstow, let alone north Sydney. 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.

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

The money spent on this stage could have been spent on modernizing the railway signal system so the train service could be improved which would benefit the communities west of Parramatta. What Western Sydney commuters really need is an extension of the heavy rail train system. I object because the public was never consulted or asked about their preferences.

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.

The KPMG and Ernst & Young studies cited by the EIS say NSW's toll roads contributed \$14 billion in benefits over ten years. No evidence is given. Tollways benefitted Transurban which owns most of them but that is not the same as the public interest in efficient transport, reduced vehicle emissions and reduced traffic. Now we are building more tollways to "reduce" traffic congestion, emissions etc. WestConnex is not a solution and I object to using public funds to enrich a private corporation. The project should not be approved.

**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: <u>MARIE GENZOS</u>
	Address: <u>169 Nelson St</u>
Application Number: SSI 7485	Suburb: <u>Seamandsdale</u> Postcode <u>2038</u>
Application Name: WestConnex M4-M5 Link	Signature: <u>[Signature]</u>
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 admits that the increased traffic congestion around the St Peters Interchange will impact on bus running times especially in the evening peak hour and increase the time taken (2.5 minutes, which seems optimistic). The 422 bus and associated cross city services which use the Princes Highway are notorious for irregular running times because of the congestion on the Princes highway and cross roads, so an admitted worsening of the running time will adversely impact the people who are dependent on the buses. This will be compounded by the loss of train services at St Peters station while it is closed for the Sydney Metro build and then subsequently when it re-opens. In all the impact of the new M5 and the M4-M5 link is to worsen access to public transport significantly for the residents of the St Peters neighbourhood.
- 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.
- There has been no 'meaningful' consultation with the community. Some areas affected by M3/M5 have not even been letterboxed by SMC. These include St Peters and sections of Erskineville. The SMC received hundreds of submissions on its concept design and failed to respond to any of these before lodging this 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.
- It is outrageous to suggest that four unfiltered stacks would be built in one area, Rozelle

**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. Simington

Signature:

H. Simington

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:

16 Glen St.

Suburb:

Parramatta

Postcode

2021

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.

- 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 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.
- The modelling area shown in Figure 8-5 should be extended to include Johnston Street and The Crescent/Minogue Crescent/Ross Street corridor to Parramatta Road to provide clarity on how these feeder routes are envisaged to operate in 2023 and 2033. It should include the modelling assumptions applied
- 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
- 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.

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Name \_\_\_\_\_ Email \_\_\_\_\_ Mobile \_\_\_\_\_

Submission to : Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <u>JAMIE DEMPSEY</u> Signature: <u>[Signature]</u>
Attention: Director – Transport Assessments	Please <u>include / delete (cross out or circle)</u> my personal information when publishing this submission to your website <b>Declaration : I HAVE NOT</b> made any reportable political donations in the last 2 years.
Application Number: SSI 7485 Application Name: WestConnex M4-M5 Link	Address: <u>17 QUEEN STREET</u> Suburb: <u>FINCH HILL NSW</u> Postcode: <u>2487</u>

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

- ❖ SMC have made it all but impossible 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. Monday and Wednesday: 10am to 7pm. Tuesday: 10am to 6pm. Thursday and Friday: 10am to 5pm. Saturday and Sunday: 11am to 4pm. This restricted access does NOT constitute open and fair community engagement.
- ❖ Given the high cost of the tolls and their anticipated annual increase it is also expected that there will be an increase on traffic generally on local roads as motorists avoid the tollways. This can already be seen on Parramatta Rd immediately the new M4 tolls were activated. We expect exactly the same effect in the roads around the interchange, including the Princes Highway, King St, Edgeware and Enmore Roads and through the streets of Erskineville and Alexandria.
- ❖ The EIS at 12-57 describes potentially serious problems where mainline tunnels alignment crosses key Sydney Water utility services that service Sydney's eastern and southern suburbs. Why is SMC proposing tunnelling within metres of these critical services when no accurate surveying has been done? And when there is only limited information available about the strength of these water tunnels? 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.
- ❖ Why the so called 'King Street Gateway' been excluded in the analysis of cumulative impacts of other projects?
- ❖ There has been no independent consideration of alternatives, in particular of a major expansion of commuter rail transport. The Department should reject this inadequate EIS and have a review of the flawed processes that have already led to massive expenditure on the inadequate option of privatised toll roads. This proposal is out of step with contemporary urban planning.
- ❖ I object to the fact that the WestConnex Traffic Model has not been released to Councils and the community.
- ❖ EIS 6.1 (Synthesis, Page 45) describes the Process for addressing project uncertainties. "The EIS is based on the concept design developed for the project. As such, it is to be expected that some uncertainties exist that will need to be resolved during detailed design and construction and operational planning. As described in Chapter 1, construction contractors (for each stage of the project) would be engaged during detailed design to provide greater certainty on the exact locations of temporary and permanent facilities and infrastructure as well as the construction methodology to be adopted. 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". The EIS should not be approved till the bulk of these 'uncertainties' have been fully researched and surveyed and the results (and any changes) published for public comment.
- ❖ 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.
- ❖ 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.
- ❖ 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.

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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:

Colinne Sellen

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:

Suburb:

Rozelle

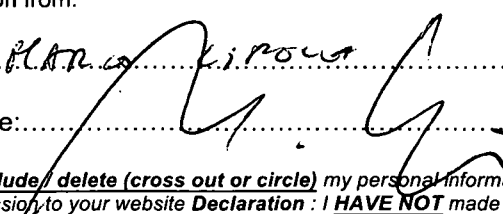
Postcode

**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.

Submission from:	Submission to:
Name: <u>Alan Kipour</u>	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature: 	Attn: Director – Transport Assessments
<small>Please <u>include</u> / <u>delete</u> (cross out or circle) my personal information when publishing this submission to your website Declaration: I <u>HAVE NOT</u> made any reportable political donations in the last 2 years.</small>	Application Number: SSI 7485 Application
Address: <u>67 BELORE ST</u>	Application Name: WestConnex M4-M5 Link
Suburb: <u>ROZELLE</u> Postcode: <u>2039</u>	

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.

- Stage 3 is the most complex and expensive stage of WestConnex and the government is seeking approval, yet there are no detailed construction plans so we are not speaking to a real situation.
- The process that has led to this EIS has been undemocratic and obscure, driven by decisions made behind closed doors.
- 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.
- 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 7-41 acknowledges that there is great concern in the community that King Street, Newtown, will be made a 24 hour clearway, stating "Roads and Maritime has no plan to change the existing clearways on King Street". This statement is deliberately misleading - it infers that SMC has authority in controlling impacts on regional roads. Roads and Maritime have the unfettered right to declare Clearways wherever and whenever they wish, and RMS has **NEVER** stated publicly that King Street will not be subject to extended clearways.
- The EIS at 12-57 describes possible disruptions of water supply to a vast area of Sydney as a result of tunnelling in the proximity of two major Sydney Water Tunnels in the Newtown area, stating "*Detailed surveys should be undertaken to verify the levels and condition of these Sydney Water Assets*". Why has an EIS been published that infers that the tunnel alignments have been thoroughly surveyed and researched, when further survey work could dramatically alter the alignments in the future ?
- There are estimated 100 heavy and 70 light vehicle movements a day and the plan is to allow a right-hand turn into Darley Road from the CW Link. The trucks will drive onto Darley Road, turn right into the site and then left back out onto the CW Link, which is unrealistic given the amount of traffic on these roads now.
- 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 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?
- 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)

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

Name: Susan Meyers

Signature: [Handwritten 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: Birdgrove 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 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 29 meters. 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.
- ◇ I object to the selection of the Darley Road site on the basis that the works required (demolition and surface works) will create unacceptable and unbearable noise and vibration impacts for extended periods. The EIS indicates that at least 36 homes will basically be unliveable during this period. In addition, the planned 170 heavy and light vehicles will considerably worsen the impact of construction noise.
- ◇ There has been no independent consideration of alternatives, in particular of a major expansion of commuter rail transport. The Department should reject this inadequate EIS and have a review of the flawed processes that have already led to massive expenditure on the inadequate option of privatised toll roads. This proposal is out of step with contemporary urban planning.
- ◇ 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.
- ◇ 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.



Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <u>LYNN CAMPBELL</u>	
Application Number: SSI 7485	Address: <u>42 LENNOX ST</u>	
Application Name: WestConnex M4-M5 Link	Suburb: <u>NEWTOWN</u>	Postcode <u>2042</u>
Please <u>include / delete (cross out or circle)</u> my personal information when publishing this submission to your website <b>Declaration : I HAVE NOT</b> made any reportable political donations in the last 2 years.		
Signature: 		

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 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.
- The original objectives of the project specified improving road and freight access to Sydney Airport and to Port Botany. We now have proposals for Stages 1,2 and 3 and none achieve this goal. The community is asked to support this proposal on the basis of other major unfunded projects, which are little more than ideas on a map. This is NOT the way to plan a liveable city.
- There will be 100 workers a day on the site, with provision for only 10-20 car spaces and there is a concession that local streets will be used, who will be 'encouraged' to use public transport. Our experience with the major construction sites in Haberfield, and St Peters that public transport is not used by the workers and that despite the fact they are not supposed to do so, they park in our local streets and cause strife with our residents.
- The EIS at 7-21 states that Community update Newsletters were distributed to residents 'near the project footprint' in many suburbs. This statement is simply not correct. No such newsletters were received by residents in central and northern Newtown. SMC was made aware of this fact, but has not responded to verbal and written requests for audited confirmation of the addresses 'letterboxed'. This statement of community engagement should be rejected by the Department.
- 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.
- 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.
- 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 ?
- I completely reject this EIS due to its failure to consider the alternative plan put forward by the City of Sydney.
- 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.

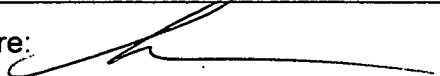
**Campaign Mailing Lists** : I would like to volunteer and/or be informed about the anti-WestConnex campaigns - My details must be removed before this submission is lodged, and must be used only for campaign purposes and must not be divulged to other parties

Name \_\_\_\_\_ Email \_\_\_\_\_ Mobile \_\_\_\_\_

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: <i>Lloyd Hamrahay</i> Signature: <i>[Signature]</i> Please <b><u>include / delete (cross out or circle)</u></b> my personal information when publishing this submission to your website. <b>Declaration:</b> I <b><u>HAVE NOT</u></b> made any reportable political donations in the late 2 years. Address: <i>72 Styles St.</i> Suburb: <i>Leichhardt</i> Postcode: <i>2040</i>
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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 23<sup>rd</sup> 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: <i>Thomas Cafe</i>	
	Address: <i>20 The Ridge</i>	
Application Number: SSI 7485	Suburb: <i>Melensburgh</i>	Postcode <i>2508</i>
Application Name: WestConnex M4-M5 Link	Signature: 	
Please <u>include / delete (cross out or circle)</u> my personal information when publishing this submission to your website Declaration: I <u>HAVE NOT</u> 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 M4/M5 Application, for the following reasons:

1. The process that has led to this EIS has been undemocratic and obscure, driven by decisions made behind closed doors.
2. Hundreds of risks associated with this project have not been assessed but have instead been deferred to a detailed design stage into which the public will have no input. I call on the Department of Planning to reject this inadequate EIS that has been prepared by AECOM, which has multiple commercial interests in WestConnex.
3. 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.
4. There has been no independent consideration of alternatives, in particular of a major expansion of commuter rail transport. The Department should reject this inadequate EIS and have a review of the flawed processes that have already led to massive expenditure on the inadequate option of privatised toll roads. This proposal is out of step with contemporary urban planning.
5. The original objectives of the project specified improving road and freight access to Sydney Airport and to Port Botany. We now have proposals for Stages 1,2 and 3 and none achieve this goal. The community is asked to support this proposal on the basis of other major unfunded projects, which are little more than ideas on a map. This is NOT the way to plan a liveable city.
6. 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.
7. 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).
8. 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.
9. It is quite clear that the escalating cost of tolls will encourage drivers to avoid tollways. This will further pollute and congest local roads. Such impact is already evident on Parramatta Rd usage after the new M4 tolls were introduced. The community expects similar impacts on roads around the St Peters interchange, including the Princes Highway, King St, Enmore and Edgeware Roads and though streets of Alexandria and Erskineville. The EIS Traffic analysis fails to deal with this issue of traffic beyond the boundaries of the project and should be rejected.
10. I object to the fact that the WestConnex Traffic Model has not been released to Councils and the community.
11. 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.
12. Unfiltered stacks anywhere in Sydney are not unacceptable. An extra exhaust stack on the NW corner of the St Peters interchange will increase pollution in an area where the prevailing winds will spread emissions over residences, schools and sports fields. St Peters Primary School will be at the apex of a triangle between the two exhaust stacks on the SW and NW corners of the interchange.
13. 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 Tempe, Sydenham, St Peters and Newtown -is an unknown hazard to buildings. Residents have found it hard enough to get compensation for damage done to buildings by Stage One and Two. Two different tunnelling operations taking place at such proximity will further increase difficulty because private contractors will blame the other project.

In this submission I have only been able to include some of my objections to this EIS. We have already witnessed the destruction of tracts of Haberfield and St Peters. It is time to consider this entire project before more damage is done.



Submission from: Name: <u>Chloe Harrison</u> Signature:  Please <del>include</del> <b>delete (cross out or circle)</b> my personal information when publishing this submission to your website <b>Declaration : I HAVE NOT</b> made any reportable political donations in the last 2 years. Address: <u>2/22 Ness Ave</u> Suburb: <u>Dulwich Hill</u> Postcode: <u>2203</u>	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
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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.

- o Stage 3 is the most complex and expensive stage of WestConnex and the government is seeking approval, yet there are no detailed construction plans so we are not speaking to a real situation.
- o The process that has led to this EIS has been undemocratic and obscure, driven by decisions made behind closed doors.
- o 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.
- o 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.
- o The EIS at 7-41 acknowledges that there is great concern in the community that King Street, Newtown, will be made a 24 hour clearway, stating "Roads and Maritime has no plan to change the existing clearways on King Street". This statement is deliberately misleading - it infers that SMC has authority in controlling impacts on regional roads. Roads and Maritime have the unfettered right to declare Clearways wherever and whenever they wish, and RMS has **NEVER** stated publicly that King Street will not be subject to extended clearways.
- o The EIS at 12-57 describes possible disruptions of water supply to a vast area of Sydney as a result of tunnelling in the proximity of two major Sydney Water Tunnels in the Newtown area, stating "*Detailed surveys should be undertaken to verify the levels and condition of these Sydney Water Assets*". Why has an EIS been published that infers that the tunnel alignments have been thoroughly surveyed and researched, when further survey work could dramatically alter the alignments in the future ?
- o There are estimated 100 heavy and 70 light vehicle movements a day and the plan is to allow a right-hand turn into Darley Road from the CW Link. The trucks will drive onto Darley Road, turn right into the site and then left back out onto the CW Link, which is unrealistic given the amount of traffic on these roads now.
- o 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.
- o 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?
- o 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)

**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 to : Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <i>Chloe Harrison</i> Signature: <i>[Signature]</i>	
Attention: Director – Transport Assessments	Please <b>include / delete (cross out or circle)</b> my personal information when publishing this submission to your website <b>Declaration</b> : I <b>HAVE NOT</b> made any reportable political donations in the last 2 years.	
Application Number: SSI 7485 Application Name: WestConnex M4-M5 Link	Address: <i>2/22 Ness Ave</i> Suburb: <i>Dulwich Hill</i> Postcode <i>2103</i>	

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) 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. The government needs to urgently review its policy of support for unfiltered stacks.
- b) 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.
- c) I am deeply disappointed that the 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. This is a dangerous and reckless attempt to get approval for a project that is yet to be properly designed.
- d) 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.
- e) There have been widespread reports in the media about extensive unresolved disputes regarding damages to houses in the Stage 1 M4 and Stage 2 M5 construction process. Why should the community believe that there will not be extensive damages to houses in Stage 3?
- f) 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.
- g) It is quite clear that the escalating cost of tolls will encourage drivers to avoid tollways. This will further pollute and congest local roads. Such impact already evident on Parramatta Rd usage after the new M4 tolls were introduced. The community expects similar impacts on roads around the St Peters interchange, including the Princes Highway, King St, Enmore and Edgeware Roads and though streets of Alexandria and Erskineville. The EIS Traffic analysis fails to deal with this issue of traffic beyond the boundaries of the project and should be rejected.
- h) 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.
- i) 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.
- j) 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.

**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 \_\_\_\_\_

<p><b>Attention Director</b>          Application Number: SSI 7485 Application</p> <p>Infrastructure Projects, Planning Services,          Department of Planning and Environment          GPO Box 39, Sydney, NSW, 2001</p> <p>Application Name: WestConnex M4-M5 Link</p>	<p>Name: <u>MICHAEL DONNELL</u></p> <p>Signature: <u>[Signature]</u></p> <p>Please <u>include</u> / <u>delete</u> (cross out or circle) my personal information when publishing this submission to your website. I <u>HAVE NOT</u> made reportable political donations in the last 2 years.</p> <p>Address: _____</p> <p>Suburb: <u>ANNANDALE</u> Postcode <u>2038</u></p>
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I object to the WestConnex M4-M5 Link proposals for the following reasons:

- 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.
- 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.
- 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 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 justification for this project relies on the completion of other projects such as the Western Harbour Tunnel which has not yet been planned, let alone approved.
- Are there other potentially serious problems with Sydney Water utility services (described at EIS 12-57) or with other utilities in other suburbs or along the proposed M4-M5 tunnel alignment? If so, the EIS proposals and application should not be approved till these are all disclosed, researched, surveyed and the resolution publicly published.
- 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).
- 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.
- I strongly object to the privatisation of the WestConnex project that turns public monies into private profit.
- 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.

**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: Louise Funnell

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: 8/1 Wany Lane

Suburb: Leichhardt 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 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.

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

Name: MAGDA PETALAS

Signature: [Signature]

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

Address: 79 MORE ST

Suburb: LEICHHARDT 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 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. 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 of 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.
- ☐ 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.
- 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. (Executive Summary xvi)
- ☐ 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)
- ☐ No noise barriers have been proposed. This is unacceptable and appropriate noise barriers should be included in the EIS for consideration. (Executive Summary xvii)

**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: MICHAEL McLAUGHLIN

Signature: [Signature]

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

Address: 40216 VARA 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

- ☐ We 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.
- ☐ Tunnel depths the tunnel depths for the Leichhardt area as low as 35 metres. This creates an unacceptable risk of damage to homes due to settlement (ground movement). The EIS acknowledges that at tunnelling at 35 metres and less this is a real risk. There is no mitigation provided for this risk. Instead, it states that properties will be repaired at the Government's expense. However no details or assurance as to how this will occur are provided. The project should not be approved with such tunnelling depths permitted and with no detail as to the extent of damage and how and when it will be repaired. It will lead to the situation where residents and businesses are forced to engage structural engineers and lawyers to prove that the damage was linked to Westconnex works, with no assurance that this property damage will be promptly and satisfactorily fixed.
- ☐ 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.
- ☐ 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.
- ☐ The presence of 170 heavy and light vehicle movements a day at this site will create an unacceptable risk to students. The EIS should not permit any truck movements near the Darley Road site. The alternative proposal which provides that all spoil trucks enter and leave from the City West link is the only proposal that should be considered.
- ☐ 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.

**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

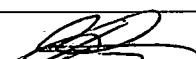
Name \_\_\_\_\_ Email \_\_\_\_\_ Mobile \_\_\_\_\_



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

Submission in relation to: Application Number - SSI 7485

Application name - WestConnex M4-M5 Link

Name: GABRIELLE PAVICIC	
Address: 25 CABARITA RD Post Code 2137	Suburb CABARITA
Please include my personal information when publishing this submission to your website Yes <input checked="" type="radio"/> (No)	
Declaration: I have not made any reportable political donations in the last 2 years. -	
Signed: 	Date 26/9/17

• **Traffic and transport - use of local roads by heavy vehicles**

I object to the Civil and Tunnel Construction site at Darley Road Leichhardt because the proponent has failed to comply with the SEARS which require that the Proponent must assess construction transport and traffic (vehicle, pedestrian and cyclists) impacts in relation to access constraints and impacts on public transport, pedestrians and cyclists.

In Note 1 to Table 8-43 'Indicative access routes to and from construction ancillary facilities' the proponent states that 'Some use of local roads by heavy vehicles delivering materials and/or equipment may also be required, however this would be minimised as far as practicable.'

The experience of residents in local streets near other tunnel construction sites such as the streets near the M4 East site at Northcote St Haberfield is that heavy and light vehicles use these local streets and cause a high level of adverse impact. The complaints relate to construction vehicles parking out local residents, idling engines, using local roads after hours and carrying rattling loads that increase the noise impact to residents.

I object to the Civil and Tunnel Construction site at Darley Road Leichhardt because if it is allowed to proceed then it is inevitable that residents of Charles St, Hubert St and Francis St, which are quiet residential streets, will experience these same very adverse impacts. Once approval is given residents will not be able to enforce a minimal level of use of local roads by light or heavy vehicles associated with the Civil and Tunnel Construction site at Darley Road. It is inevitable that minimal use will become standard use. The contractor who is appointed to the project will be allowed to use local roads and will not be able to stop sub-contractors using local roads.

The proponent should be required to abandon the Darley Road civil and tunnel site Leichhardt. Alternatives have been identified which would avoid or minimise the use of local streets and the proponent has not given an adequate explanation as to why these alternatives have not been included in the EIS.

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

Name: Cullen Cohen

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: 155 Trafalgar St

Suburb: Stannmore

Postcode: 2048

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 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. 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 of 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.
2. 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.
3. 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. (Executive Summary xvi)
4. 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)
5. No noise barriers have been proposed. This is unacceptable and appropriate noise barriers should be included in the EIS for consideration. (Executive Summary xvii)

**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**

Submission in relation to: Application Number - SSI 7485

Application name - WestConnex M4-M5 Link

Name: <i>MAAITA OGBURN</i>	
Address: <i>20 BOYLE ST</i> Post Code <i>2037</i>	Suburb <i>GLEBE</i>
Please include my personal information when publishing this submission to your website <input checked="" type="radio"/> Yes / No	
Declaration: I have not made any reportable political donations in the last 2 years.	
Signed: <i>Maaita Ogburn</i>	Date <i>26/9/17</i>

I **object** to the WestConnex M4-M5 Link proposals as contained in the EIS application #SSI 7485 for the reason(s) set out below.

- **Contaminated site**

I **object** to the Darley Road Civil and Tunnel Construction site at Leichhardt because the proponent has failed to comply with the SEARS requirement in relation to Air quality, that the project is designed, constructed and operated in a manner that minimises air quality impacts (including nuisance dust and odour) to minimise risks to human health and the environment to the greatest extent practicable.

7 Darley Road is a site which has been reported to the NSW EPA under section 60 of the CLM Act. Although NSW EPA assessed the site as not requiring regulation under the CLM Act in 16.2.14 of the EIS the proponent sets out in Table 16-15 the contaminants of potential concern that are present at Darley Rd. These are metals, polycyclic aromatic hydrocarbons, total recoverable hydrocarbons, asbestos and Volatile Organic Hydrocarbons (SVOCs).

The proponent's plan for the Darley Road Civil and Tunnel Construction site at Leichhardt involves demolition, earthworks, construction and track-out (the transport of dust and dirt from the construction/demolition site onto the public road network on construction vehicles).

I **object** to the Darley Road Civil and Tunnel Construction site at Leichhardt because of the impact that disturbance of contaminants will have on health and on property. The community should not be put at risk when a dive site is not necessary.

- **Asbestos contaminated site**

I **object** to the Darley Road Civil and Tunnel Construction site at Leichhardt because the proponent has failed to comply with the SEARS requirement in relation to Air quality, that the project is designed, constructed and operated in a manner that minimises air quality impacts (including nuisance dust and odour) to minimise risks to human health and the environment to the greatest extent practicable.

Appendix R, 4.7.8 Areas and contaminants of concern the proponent states that 'There is also potential for asbestos to be present in the fill from potential uncontrolled filling and demolition of former buildings.'



The proponent's assessment is defective as it fails to identify the risk to local residents and anyone else in the neighbourhood of excavated soil containing contaminants and asbestos being blown into nearby streets and into homes and gardens of adjoining properties. The proponent's assessment is defective because having identified the presence of asbestos on the site it fails to specifically identify the potential for inhalation of asbestos either by workers or residents.

**I object** to the Darley Road Civil and Tunnel Construction site at Leichhardt because of the impact that disturbance of asbestos will have on health and on property. The community should not be put at risk when a dive site is not necessary.

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

Name: Andrew Clark

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: Birchgrove

Suburb: Birchgrove 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 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.

✦ 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.

✦ 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."

✦ 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: <u>SUZANNE McMASTER</u> Address: <u>196 Catherine St</u>
Application Number: SSI 7485	Suburb: <u>Leichhardt</u> Postcode: <u>2040</u>
Application Name: WestConnex M4-M5 Link	Signature: <u>[Signature]</u>
Please <u>include</u> my personal information when publishing this submission to your website Declaration : I <u>HAVE NOT</u> 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:

1. I further object to the proposal to the Darley Road civil and tunnel site for the reasons set out in this submission.
2. 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. 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 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 of 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.
3. The impacts in the EIS are misleading because they do not include any detail of the cumulative impact caused by the overlaps in the construction periods of the New M5 and M4 (of up to one year). 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 multiple WestConnex projects. The EIS makes no attempt to measure or mitigate the cumulative impact of these prolonged periods of construction noise exposure. Nor does the EIS provide for any traffic management to prevent rat running during the period of construction, when Stages 1 and 2 have opened. The EIS should not be approved without this detail and adequate plans to manage this impact.
4. 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)
5. The EIS states that all vegetation on the Darley Road site will be removed. This includes a mature large tree which provides a visual and noise barrier from the City West Link. The tree should not be permitted to be removed.
6. Despite the fact the EIS identifies over 30 homes with severe noise impacts, no mitigation is mandated. While the possibility of noise walls is flagged, along with in-home treatments, none of this is a requirement. Nor is any detail provided on which residents or business owners can comment. No noise barriers have been proposed. This is unacceptable and appropriate noise barriers should be included in the EIS for consideration. (Executive Summary xvii)

**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 \_\_\_\_\_



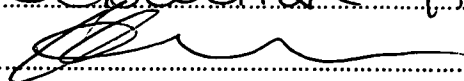
24.9.17

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

Name:

Sebastian Hardy

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:

11 Dan St

Suburb:

Newtown

Postcode:

2062

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. 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.
- B. The EIS states that construction noise levels would exceed the relevant goals without additional mitigation. The additional mitigation is mentioned but not proposed. All possible mitigation should be included as a condition of approval. The EIS acknowledges that substantial above ground invasive works will be required to demolish the Dan Murphys building and establish the road. The EIS noise projections indicate that for 10 weeks residents will suffer unacceptable noise impacts. The EIS does not contain a plan to manage or mitigate this terrible impact. There is no detail as to which homes will be offered (if at all) temporary relocation; there are no details of any noise walls or what treatments will be provided to individual homes that are badly affected. The approval needs to contain detail as to how this unacceptable impact will be managed and minimised during the construction period and, in particular, during site establishment.
- C. I object to the selection of the Darley Road site on the basis that the works required (demolition and surface works) will create unacceptable and unbearable noise and vibration impacts for extended periods. The EIS indicates that at least 36 homes will basically be unliveable during this period. In addition, the planned 170 heavy and light vehicles will considerably worsen the impact of construction noise.
- D. I am concerned that the EIS provides no reasons why the City of Sydney's alternative plan might not be preferable to the proposed WestCONnex.
- E. 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.
- F. 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.

**From:** [REDACTED]  
**Sent:** Mon, 16 Oct 2017 03:42:17 +0000  
**To:** [REDACTED]  
**Subject:** FW: Submission Details for company St Thomas Childcare Center (org\_object)

**From:** system@acelo.com On Behalf Of St Thomas Childcare Center Company  
**Sent:** Monday, 16 October 2017 2:42:06 PM (UTC+10:00) Canberra, Melbourne, Sydney  
**To:** [REDACTED]  
**Subject:** Submission Details for company St Thomas Childcare Center (org\_object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: St Thomas Childcare Center Company  
 Organisation: St Thomas Childcare Center (DIRECTOR)  
 Govt. Agency: No  
 [REDACTED]

Address:  
 [REDACTED]

Rozelle, NSW  
 2039

Content:

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 St Thomas Child Care Centre (the Centre) which has been identified sensitive receptor CR22.

Air pollution caused by the ventilation shafts

WestConnex aims to build unfiltered tunnel ventilation shafts of undetermined heights: one approximately 300m northwest and three others roughly 500m south of the Centre. There is not enough detail or evidence of analysis at the moment to enable the impact to the children at the Centre to be determined.

Please provide the following:

- \* An analysis of current traffic volumes at 9am, noon and 3pm on Victoria Road adjacent to the Centre, and projected traffic analysis for Centre days both on Victoria Road adjacent to the Centre, and for both a tolled and toll-free Iron Cove Link tunnel adjacent to the Centre, at 9am, noon and 3pm, by diesel and non-diesel engine type,
- \* Independent evidence of current air pollution levels at the Centre from 9am, noon and 3pm for all Centre days in the past year, and the projected levels of air pollution at the Centre 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 Centre for each day in the past year,
- \* The final design of the four 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, constructing the Iron Cove Link tunnel portals on Victoria Road about 350m from the Centre, and the Rail yard tunnel portals about 500m from the Centre,

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 the children attending the Centre (as well as local residents) will be negatively impacted in some way by worsened air quality, excessively loud and continuous noise, dangerous dust levels and untenable vibration non-stop for a significant part of their childhood.

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

Submission: Online Submission from company St Thomas Childcare Center (org\_object)  
[https://majorprojects.accelo.com/?action=view\\_activity&id=228108](https://majorprojects.accelo.com/?action=view_activity&id=228108)

Submission for Job: #7485 WestConnex M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)



**From:** [REDACTED]  
**Sent:** Mon, 16 Oct 2017 03:52:37 +0000  
**To:** [REDACTED]  
**Subject:** FW: Submission Details for Jenny McPherson (support)  
**Attachments:** 228110\_EIS submission\_ Jenny McPherson 14 October 2017\_2017Oct16\_1441.pdf

**From:** system@accelo.com On Behalf Of Jenny McPherson  
**Sent:** Monday, 16 October 2017 2:42:25 PM (UTC+10:00) Canberra, Melbourne, Sydney  
**To:** [REDACTED]  
**Subject:** Submission Details for Jenny McPherson (support)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Jenny McPherson  
[REDACTED]

Address:  
[REDACTED]

Jamison town, NSW  
2750

Content:  
I do not want personal information published thank you

I [REDACTED]  
Submission: Online Submission from Jenny McPherson (support)  
[https://majorprojects.accelo.com/?action=view\\_activity&id=228110](https://majorprojects.accelo.com/?action=view_activity&id=228110)

Submission for Job: #7485 WestConnex M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)

## **Submission to WestConnex New M4/M5 (Stage 3) EIS,**

### **project number SSI 16 7485**

I am a home owner/resident of Penrith. Currently I am living in the inner west with family to be near my work (5 days per week and on-call nights and weekends). I have had to relocate for the time being because I cannot afford the tolls that have just been re-introduced on the M4. I am well aware the M4 road was paid off ages ago, so why have the tolls been brought back in? I no longer know how I will manage the extra yearly costs of tolls if I move back to my Penrith home. Travelling on non-tolled roads takes much longer at present and I need to be at my work punctually due to my responsibilities.

### **I OBJECT TO THE WESTCONNEX PROJECT INCLUDING THIS LATEST PART, THE STAGE 3 (M4-M5).**

#### **My main reasons are:**

1. I object to paying high tolls to fund a road that does not benefit people like me who usually live in Western Sydney. A great number of people like me just cannot afford the high tolls and we should not have to be penalised for living in our suburbs.
2. 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 and preferences.
3. WestConnex doesn't even include the link to Port Botany or Sydney Airport which is what people were originally promised to make it easier (especially to the Airport).
4. The EIS for M4-M5 admits that the people who live in Western Sydney mostly 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 or closer in to the city. This is unfair when the benefits of Stage 3 are all for north-south connections to the northern beaches or the proposed new Sydney Harbour tunnel.
- 5.. Most people in Emu Plains, Penrith, Mt Druitt or Blacktown who work in Sydney CBD use the trains. What workers like me need who usually travel to Sydney city are better and more frequent trains. This is just dismissed by the EIS.
6. I now know the State Government plans to sell WestConnex, both the constructing and the operation parts. I really object to the privatisation of the road system. If it's privatised, there is no guarantee of protecting the public in an efficient transport system when so much of it would operate to make a profit for shareholders. I have paid my taxes for many years and want a public transport system that works for people like me (especially trains). I want it to be publicly owned. If we had better public transport which connected our suburbs, then many of us would not have to drive and this would reduce the number of people driving their cars and congestion generally.
7. I have recently found out that the high tolls are supposed to increase by the CPI or 4% a year, whichever is higher. My wages have not gone up in three years and I am not keeping up with my rising costs – like gas, water, electricity and now tolls. It is very unfair. This is just gouging us Western Sydney road users to make the road attractive for a private company to buy it. I really object to this.
8. I object to the way the Minister supposed to represent Penrith, Stuart Ayres, is saying Western Sydney will benefit from WestConnex when hardly any parts of Sydney west of Parramatta are even mentioned in the EIS for Stage 3. This is deliberately misleading. I now

know 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.

9. I am about to become a grandmother. I want my children, and their children, to have a bright future in Sydney, with as clean air as is possible. I believe this whole WestConnex road will increase pollution everywhere and will contribute hugely to climate change. Car emissions are bad for people's health and for the environment.

**I object to the entire EIS for Stage 3 of WestConnex.**

*Jenny McPherson*

14 October 2017

19 Glenbrook Street, Jamisontown 2750

**I do not want my street address published.**

(I have not made any donation to any political party ever).



**From:** [REDACTED]  
**Sent:** Mon, 16 Oct 2017 04:16:33 +0000  
**To:** [REDACTED]  
**Subject:** FW: Submission Details for Marie Flood (object)

**From:** system@accelo.com On Behalf Of Marie Flood  
**Sent:** Monday, 16 October 2017 3:14:01 PM (UTC+10:00) Canberra, Melbourne, Sydney  
**To:** [REDACTED]  
**Subject:** Submission Details for Marie Flood (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Marie Flood  
 [REDACTED]

Address:  
 [REDACTED]

Alexandria, NSW  
 2015

Content:  
 Submission on Stage 3 EIS Westconnex, 16 October 2017  
 Re Application SSI 16\_7485: M4-M5-Link

I object to the M4-M5 link.

Sydney has a major problem with traffic congestion but this project's EIS has not demonstrated that it will help relieve this problem and therefore it should not be approved.

I urge the Department to seriously consider alternatives to all the stages of Westconnex, including the M4-M5 link, before proceeding.

There is no single solution to solving traffic congestion in Sydney, and there is mounting evidence that Westconnex could make the current situation in many areas.

In fact the EIS for this project acknowledges that it will make traffic worse near my home in Alexandria. There's got to be more effective, cheaper and less destructive alternatives. I appeal to the Department to accept this and look at the available alternatives to find a cost-effective and more environmentally acceptable way forward.

Some of the alternatives were considered in the EIS, such as improving arterial roads and upgrading public transport, but they were dismissed as not solving the problem. There can be no one solution - only a properly planned road system integrated with heavy and light rail can work.

It is critical that the Department go back to the goals originally stated for Westconnex, the reason it received support from Infrastructure Australia. It was meant to relieve congestion from the port and the airport, to enable the movement of freight and to relieve traffic congestion around the airport. These goals were put aside in favour of expensive, polluting commuter tollways which will continue to destroy residential suburbs for years to come if it is allowed to continue.

While a vague plan for the Sydney Gateway has been floated it has not been funded nor planned as part

of an integrated system that's likely to work for Sydney. The M4-M5 can't work without access to the port and airport being improved, and there's no evidence in the EIS that it will.

I would like to comment more specifically on how the M4-M5 will impact on my community. My big fear is about the dangers of increased air pollution on the health of my community. The presence of particulate matter in air around the huge roads proposed in this area is already at dangerous levels (there are no safe levels) so to inflict even more vehicles, often gridlocked, on our community presents a major risk to the health of residents. I strongly object to this attack on our wellbeing and life expectancy.

The EIS needs to include the streets that will be impacted by the project. Important streets in our area are already bumper to bumper during peak hours (Mitchell Road, McEvoy, Wyndham, Fountain for example) and it appears from the EIS that they will be made even worse by this project. The many new housing developments around Alexandria (e.g. Ashmore Estate) and the overdevelopment of the Australian Technology Park by Mirvac should be included in the traffic modelling because of their significant traffic implications when they are completed.

The EIS tells us there will be thousands of 'unreleased vehicles' in this area because of the project, which I understand means that the network will be so congested it won't be possible for vehicles to get onto it during peak periods. The modelling suggests drivers will travel at different times if they can't get onto the roads when they used to. It would be disastrous to approve this plan and make commuters disrupt their home and working lives because their travel options have been reduced by the failures of Westconnex and NSW transport planning.

I am offended to see Westconnex claiming that residents will be better off when the St Peters Interchange is built because there will be new open space under the interchange. Westconnex has already cost us many hundreds of trees and bounded Sydney Park by massive roads, isolating it from its potential users. Open space under massive highways overhead does nothing to make amends for all the losses we've experienced due to Westconnex.

The people of this state deserve better than implementing Westconnex. It represents a massive waste of money, it's no solution to moving freight from the port, it's no solution to traffic congestion around the airport, and not even relief from commuter traffic congestion.

The people of inner south-west Sydney do not deserve the detrimental impacts of the M4-M5 as outlined above.

Please stop and look for alternative solutions to traffic congestion that are safe and effective for residents, workers and the environment.

Submission: Online Submission from Marie Flood (object)

[https://majorprojects.accelo.com/?action=view\\_activity&id=228129](https://majorprojects.accelo.com/?action=view_activity&id=228129)

Submission for Job: #7485 WestConnex M4-M5 Link

[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link

[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)

**From:** [REDACTED]  
**Sent:** Mon, 16 Oct 2017 04:27:45 +0000  
**To:** [REDACTED]  
**Subject:** FW: Submission Details for Roslyn Dunlop (object)  
**Attachments:** 228133\_EIS submission objecting to Westconnex\_2017Oct16\_1519.pdf

**From:** system@acelo.com On Behalf Of Roslyn Dunlop  
**Sent:** Monday, 16 October 2017 3:20:11 PM (UTC+10:00) Canberra, Melbourne, Sydney  
**To:** [REDACTED]  
**Subject:** Submission Details for Roslyn Dunlop (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Roslyn Dunlop  
[REDACTED]

Address:  
[REDACTED]

Rozelle, NSW  
2039

Content:  
 Ros Dunlop  
 17 Callan St  
 Rozelle NSW 2039

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 30 years in Callan St. The community I live in, is a close knit and caring community where people care and support each other, a rare thing in the modern world we live in. The members of our community are passionate about protecting the values and qualities of our community. To that extent we find the proposal identified in the EIS threatens the essence of our community and puts the health and safety of our community and thousands of others at risk. 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.

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.

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. Callan St is a particularly busy road on Saturdays with a huge volume of cars using the road due to heavy use of the sporting facilities in Callan Park, particularly King George oval.
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 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.
4. Should this project proceed and prior to any construction, thorough dilapidation reports must be carried out on all houses and buildings in the Rozelle area by independent dilapidation engineers and paid for by the State Government. Ongoing vibration monitoring must be carried out during construction project period and beyond. The proposal will cause significant vibrations during the construction period and likely will cause damage to my house and other dwellings and buildings in Rozelle. Compensation for damage caused and rectification and repairs to my property is to be guaranteed. I would like guarantees that future traffic usage of the tunnels will not cause vibration and noise; and if so I should be adequately compensated.
5. 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 fails to deliver on its objectives. 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 behaviour is called 'peak spreading'..." This is a categorical admission of failure of this complete project.
6. 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.
7. 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.

8. 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.

9. 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.

10. 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.

11. Many homes around the Iron Cove Link, 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.

12. There are two areas in the Rozelle Rail Yards site where construction will be by cut and cover. These are the Portals for the Western Harbour Tunnel and the Portals for the M4/M5 link. This is of particular concern in the light of residents experiences in areas of Haberfield and St Peters where highly contaminated land areas were being disturbed. There was totally inadequate control of dust in these areas, where the dust would have been loaded with toxic chemical particulates. The old Rail Yards are highly contaminated land from their past use. The EIS gives no specific details of how this highly toxic threat is going to be securely managed. It is not acceptable for this to be decided only when the Construction Contracts have been issued, when the community will have no say or control over the methodology to be employed for removing vast amounts of contaminated spoil.

13. The Rozelle Rail Yards site is the location of 3 Unfiltered Pollution Stacks. There is a fourth unfiltered stack between Callan and Springside Streets on Victoria Rd. 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. 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. Paul Torzillo, Head of Respiratory medicine at Royal Prince Albert Hospital has stated that heart

disease will skyrocket due to air pollution caused by Westconnex bringing more cars into the Inner West.  
14. The Health costs of outdoor Air Pollution in Australia are up to \$8.4 Billion a year. The Health costs of Particulate Pollution in the Sydney Greater Metropolitan area is around \$4.7 Billion a year. With no filtration on the Westconnex tunnels these Health costs will rise substantially.

15. The EIS shows a diagrammatic explanation of the way the polluted air will be expelled from the Westconnex tunnels. This method will work on straight tunnels of short distance providing there is no traffic congestion. There are already signs in tunnel locations in Sydney advising motorists to roll up their windows and put on their 'in vehicle circulating' air conditioning. This type of straight line pollution expulsion doesn't work if the tunnels go around corners, which is the case with the tunnels from the Rozelle Rail Yards site.

16. 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.

17. 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.

18. 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 totally inappropriate and demonstrates that those who have put these plans together are not in touch with reality! At a time when major World cities are doing all they can to address the dire problems of pollution this is an appalling suggestion.

19. 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.

20. Generally the risk of settlement is lessened where tunnelling is more than 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 tunnelling 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.

21. 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.

In summary my key Issues are:

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

I completely oppose the Iron Cove Tunnel Link below Rozelle.

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

I completely oppose the Rozelle interchange and the tunnels below my houses.

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

I demand an independently prepared detailed professional dilapidation report be carried out on my houses prior to any construction progressing.

I demand compensation should my house be damaged by this proposal.

I demand the State government compensate me for the loss of value of my properties, stress and anxiety caused by this proposal, inconvenience and disruption to me and my family's lives, noise, vibration, 24 hour construction activity and loss of wellbeing and quality of our lives.

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

Sincerely,

Dr. Roslyn Dunlop

27. Land Subsidence in the areas of all tunnel routes is of great concern to all residents. This is of especial concern in the Rozelle /Lilyfield area where there are layers of tunnels. There is likely to be ongoing and considerable subsidence even when the tunnels are built due to the ongoing necessity to remove ground water from the tunnels. This will lead to a slow drying out of the sandstone and hence settlement.

Submission: Online Submission from Roslyn Dunlop (object)

[https://majorprojects.accelo.com/?action=view\\_activity&id=228133](https://majorprojects.accelo.com/?action=view_activity&id=228133)

Submission for Job: #7485 WestConnex M4-M5 Link

[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link

[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)

Ros Dunlop  
17 Callan St  
Rozelle NSW 2039

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 30 years in Callan St. The community I live in, is a close knit and caring community where people care and support each other, a rare thing in the modern world we live in. The members of our community are passionate about protecting the values and qualities of our community. To that extent we find the proposal identified in the EIS threatens the essence of our community and puts the health and safety of our community and thousands of others at risk.

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.

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.

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. Callan St is a particularly busy road on Saturdays with a huge volume of cars using the road due to heavy use of the sporting facilities in Callan Park, particularly King George oval.

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.

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4. Should this project proceed and prior to any construction, thorough dilapidation reports must be carried out on all houses and buildings in the Rozelle area by independent dilapidation engineers and paid for by the State Government. Ongoing vibration monitoring must be carried out during construction project period and beyond. The proposal will cause significant vibrations during the construction period and likely will cause damage to my house and other dwellings and buildings in Rozelle. Compensation for damage caused and rectification and repairs to my property is to be guaranteed. I would like guarantees that future traffic usage of the tunnels will not cause vibration and noise; and if so I should be adequately compensated.

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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.

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

Sincerely,

Dr. Roslyn Dunlop

27. Land Subsidence in the areas of all tunnel routes is of great concern to all residents. This is of especial concern in the Rozelle /Lilyfield area where there are layers of tunnels. There is likely to be ongoing and considerable subsidence even when the tunnels are built due to the ongoing necessity to remove ground water from the tunnels. This will lead to a slow drying out of the sandstone and hence settlement.

**From:** [REDACTED]  
**Sent:** Mon, 16 Oct 2017 05:24:42 +0000  
**To:** [REDACTED]  
**Subject:** FW: Submission Details for Roslyn Dunlop (object)

**From:** system@acelo.com On Behalf Of Roslyn Dunlop  
**Sent:** Monday, 16 October 2017 3:21:01 PM (UTC+10:00) Canberra, Melbourne, Sydney  
**To:** [REDACTED]  
**Subject:** Submission Details for Roslyn Dunlop (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Roslyn Dunlop  
 [REDACTED]

Address:  
 [REDACTED]

Rozelle, NSW  
 2039

Content:  
 [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

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Sincerely,

Dr. Roslyn Dunlop

27. Land Subsidence in the areas of all tunnel routes is of great concern to all residents. This is of especial concern in the Rozelle /Lilyfield area where there are layers of tunnels. There is likely to be ongoing and considerable subsidence even when the tunnels are built due to the ongoing necessity to remove ground water from the tunnels. This will lead to a slow drying out of the sandstone and hence settlement.

Submission: Online Submission from Roslyn Dunlop (object)

[https://majorprojects.accelo.com/?action=view\\_activity&id=228137](https://majorprojects.accelo.com/?action=view_activity&id=228137)

Submission for Job: #7485 WestConnex M4-M5 Link

[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link

[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)

**From:** [REDACTED]  
**Sent:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** FW: Submission Details

**From:** system@accelo.com On Behalf Of [REDACTED]  
**Sent:** Monday, 16 October 2017 3:36:03 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: [REDACTED]

Address:  
[REDACTED]  
[REDACTED]

Content:

Design of this project is clearly being made "on the run". Not surprisingly no serious offers have been made to construct the Rozelle/Annandale interchange because of its complexity. Placing 3 smokestacks so closely together is to concentrate pollution unreasonably. To refuse to filter them is to admit that the NSW Govt doesn't care about the health of the citizens living in this area. The Crescent is already in gridlock at certain times of the day and will be unusable if this project goes ahead.

IP Address: [REDACTED]

Submission: Online Submission from [REDACTED] (object)

[https://majorprojects.accelo.com/?action=view\\_activity&id=228145](https://majorprojects.accelo.com/?action=view_activity&id=228145)

Submission for Job: #7485 WestConnex M4-M5 Link

[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link

[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)

**From:** [REDACTED]  
**Sent:** Mon, 16 Oct 2017 04:43:43 +0000  
**To:** [REDACTED]  
**Subject:** FW: Submission Details for company Lion (org\_comments)  
**Attachments:** 228147\_Preliminary submission\_ Westconnex\_ Lion 16\_10\_17  
FINAL\_2017Oct16\_1539.pdf

**From:** system@acelo.com On Behalf Of Kristen Dumitrescu  
**Sent:** Monday, 16 October 2017 3:41:14 PM (UTC+10:00) Canberra, Melbourne, Sydney  
**To:** [REDACTED]  
**Subject:** Submission Details for company Lion (org\_comments)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Kristen Dumitrescu  
Organisation: Lion (Legal Counsel - Corporate)  
Govt. Agency: No  
[REDACTED]

Address:  
[REDACTED]

Sydney, NSW  
2000

Content:  
Please see submission attached.

[REDACTED]  
Submission: Online Submission from company Lion (org\_comments)  
[https://majorprojects.acelo.com/?action=view\\_activity&id=228147](https://majorprojects.acelo.com/?action=view_activity&id=228147)

Submission for Job: #7485 WestConnex M4-M5 Link  
[https://majorprojects.acelo.com/?action=view\\_job&id=7485](https://majorprojects.acelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link  
[https://majorprojects.acelo.com/?action=view\\_site&id=3247](https://majorprojects.acelo.com/?action=view_site&id=3247)





Minister for Planning and Environment  
Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2000  
**Attention:** Director, Transport & Strategic Infrastructure Planning

16 October 2017

Dear Sir

**WestConnex M4-M5 Link (SSI 16/7485) – preliminary submission on EIS public exhibition**

Lion-Beer, Spirits & Wine Pty Ltd (**Lion**) has operated the Malt Shovel Brewery, a craft brewery for James Squire craft beers, on the site of 99 Pyrmont Bridge Road at Camperdown since 1988 and from expanded premises incorporating 188 Parramatta Road and 95-101 Pyrmont Bridge Road since 2009.

The Malt Shovel Brewery is a significant operational and development brewery for Lion, including for the following reasons:

- The Malt Shovel Brewery is where the James Squire brands are born, grown and then further developed for expansion into our larger brewery network. A number of James Squire beers are only produced at this site; we are not able to produce James Squire beers at significant volumes elsewhere in Lion's brewery network.
- We use the Malt Shovel Brewery for training of our sales force in beer education and also for hosting beer education sessions for our customers (on premise and off premise outlet owners / operators).
- The Malt Shovel Brewery is used to hold the historical documents and artefacts cataloguing the history and development of Lion's Hahn and James Squires beer brands.
- Over the last year, Lion has invested substantially in renovating the exterior and interior of the Malt Shovel Brewery and in securing a liquor license from the NSW Government with a view to opening the Malt Shovel Brewery to the public to experience our facilities through tastings, tours and food matching.

**Preliminary submission on the Environmental Impact Statement (EIS)**

This is Lion's preliminary submission on the EIS. Lion is currently having further information prepared to specify the impacts on the Malt Shovel Brewery site and business and seeks confirmation from the Department of Planning and Environment that a supplementary submission containing this supporting information to be lodged after the end of the public exhibition period on 16 October 2017 will be accepted and considered. Assuming the electronic submission function of the Major Projects Assessment website will

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Lion Beer Australia  
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be disabled from 17 October 2017, please advise where and to whom Lion's supplementary submission may be lodged.

### **Impacts from the proposed Pyrmont Bridge Road Tunnel Site (C9)**

The EIS identifies that the Malt Shovel Brewery premises will be located directly adjoining the proposed Pyrmont Bridge Road Tunnel Site (C9) and significant construction activities are proposed on the C9 site for a period of over four years from Q2 2018 to Q4 2022.

Lion has real and significant concerns that the construction and use of the proposed Pyrmont Bridge Road Tunnel Site (C9) will significantly affect the continued commercial viability of its business, and prevent the Malt Shovel Brewery business from pursuing its operational and development objectives for a financially significant period of time.

Those concerns include:

- Potential for the demolition of the building directly to the north of the Malt Shovel Brewery and tunnelling for the temporary access tunnel beneath Parramatta Road to cause damage to the fabric of the Malt Shovel Brewery buildings and assets. Lion is concerned that there could be shifting in the foundations of the Malt Shovel Brewery buildings, vibration impacts causing shifting of machinery and tanks used in the brewing process, cracking of the floor and structural impacts to the walls of the buildings. Expert pre- construction, mid- construction and post-construction dilapidation assessment prepared by structural/mechanical engineers should be prepared by the WestConnex contractor and provided to affected business and compensation made available for demonstrable damage to affected businesses.
- Restriction on vehicle access for customer and loading and service vehicles. Lion is concerned by proposed traffic restrictions on Pyrmont Bridge Road impacting on its essential regular truck access during delivery hours of 6am to 10pm and about proposed removal of clearway times on Parramatta Road and Pyrmont Bridge Road for customer, supplier and service trucks. In addition it is concerned about restricted access and egress from Gordon Lane to its loading docks on Gordon Lane. Any traffic management plan should be prepared in consultation with affected businesses.
- Construction of an extra lane and driveway along the Parramatta Road frontage to enable access into the site for heavy vehicles and ongoing heavy vehicle access to the site 24/7 from the northern (eastbound) carriageway of Parramatta Road indicates that access to the frontage of the Malt Shovel Brewery at 188 Parramatta Road will be removed for the entirety of the construction period from Q2 2018 to Q4 2022 or severely impacted. Early clarification should be given to Lion of any proposed acquisition of the road reserve and/or of the construction of a further lane on the road reserve obstructing access to 188 Parramatta Road or any other obstructions to entrances to the Malt Shovel premises on either Parramatta Road,





Pymont Bridge Road or Gordon Lane should be provided and all accommodations made to avoid unreasonable impacts particularly to pedestrian and loading truck access which may affect the commercial viability of the business.

- Significant and ongoing dust impacts on the Malt Shovel Brewery during demolitions, excavations and spoil transport requiring continual wash down of premises and potential dust damage to machinery. At the least any construction traffic management plan should include truck and street and footpath washing and erection of a wind sock to enable businesses to predict high level dust impacts from the construction site.
- Noise impacts on the commercial and hospitality functions of the Malt Shovel Brewery to customer numbers and financial returns. While an acoustic management shed has been proposed on the adjoining construction site, 24/7 heavy and light truck movements and construction activities appear for the C9 site to include rock blasting, generators, chain saws, rockbolting; excavators and front end loaders at the least and it is unclear if all this work will be undertaken within the acoustic management shed. Further detail of noise impacts and conditions for the publication of regular noise monitoring results (taken at a range of times when local residents, patrons and workers are likely to be affected) should be imposed.
- Potential for major safety breaches, e.g. explosions, gas leaks and the presence of asbestos and or other hazardous materials or substances at or emanating from the construction site affecting workers and patrons at local businesses including Malt Shovel Brewery. Contact details and protocols to local residents and businesses including Malt Shovel Brewery advise on all potential safety incidents should be required.

#### **Our contacts**

If there are any queries arising from this submission please contact:

- myself at 02 8120 2338, [gary.faulkner@lionco.com](mailto:gary.faulkner@lionco.com); and
- Kristen Dumitrescu (Legal Counsel – Corporate), 02 8284 3183, [Kristen.dumitrescu@lionco.com](mailto:Kristen.dumitrescu@lionco.com).

Yours faithfully

Gary Faulkner  
Brewery Director – Craft, Supply Chain





Minister for Planning and Environment  
 Department of Planning and Environment  
 GPO Box 39  
 Sydney NSW 2000

**Attention:** Ms Naomi Moss  
 Senior Planner — Transport Assessments  
 By email: [naomi.moss@planning.nsw.gov.au](mailto:naomi.moss@planning.nsw.gov.au)

25 January 2018

Dear Sir

**WestConnex M4-M5 Link (SSI 16/7485) – supplementary submission on EIS public exhibition**

On 18 October 2017, Lion-Beer, Spirits & Wine Pty Ltd (**Lion**) lodged its preliminary submission on the impact on the Malt Shovel Brewery site and business of the proposed WestConnex M4-M5 Link project. A copy of Lion's preliminary submission is **Annexure A** to this submission. As indicated in that preliminary submission, Lion now makes the following supplementary submission.

The preliminary submission identified a number of reasons why the Malt Shovel Brewery is a significant operational and development brewery for Lion. In addition to those, the Malt Shovel Brewery:

- is the spiritual home of the famous brewer Dr Charles "Chuck" Hahn. Chuck established the brewery in 1988 at this location, an old factory site in the suburb of Camperdown in Sydney, New South Wales installing two original copper vessels which he brought to Australia from New Zealand. The Camperdown brewery was renamed to the Malt Shovel Brewery in honour of the 1st fleet convict turned Australia's first brewer, James Squire. Chuck Hahn continues to play a key role in brewing the craft beers at the Malt Shovel Brewery;
- is critical for successful marketing of the James Squires' brand. The Malt Shovel Brewery is the source of all James Squire craft beer innovation and pipeline for marketing and production of successful new beers. The Malt Shovel Brewery is primarily a genuine craft and development brewery and must retain experienced and expert craft brewers to delivery that innovation pipeline. But by increasing use of social media, craft industry communication and trade tours to be supplemented by future hospitality ventures delivered by the brewers of the James Squire beers, the Malt Shovel Brewery is a critical marketing centre for craft brewed beer and the James Squire brand;

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**LION**

- is a significant production centre for the James Squires product. The Malt Shovel Brewery is a 10,000 litre per day brewery with a proven capacity of around 3 mill litres per annum. This capacity is achievable notwithstanding production hours are limited by planning conditions to the hours of 0600 – 2200 Mon-Fri. The brewery is currently manned for a 2 shifts per day operation (5 brewers + support staff) due to boiler attendance requirements. Any reduction to one shift per day because of supply or distribution restrictions resulting from the traffic impacts of the WestConnex M4-M5 project would have significant impacts on production. The Malt Shovel Brewery currently produces and distributes all James Squire Pils and Porter, James Squire Mid River and Panhead kegs and a range of innovative lines such as Hop father, Malt Shovel's Brewer's limited release and many others.

#### **Impacts from the proposed Pyrmont Bridge Road Tunnel Site (C9)**

The Environmental Impact Statement (EIS) identifies that the Malt Shovel Brewery premises will be located directly adjoining the proposed Pyrmont Bridge Road Tunnel Site (C9) and significant construction activities are proposed on the C9 site for a period of over four years from Q2 2018 to Q4 2022.

Lion has real and significant concerns that the construction and use of the proposed Pyrmont Bridge Road Tunnel Site (C9) will significantly affect the continued commercial viability of its business, and prevent the Malt Shovel Brewery business from pursuing its operational and development objectives for a financially significant period of time. As identified in our preliminary submission, those concerns and proposed measures to address those impacts are set out in the table below:

Impact	Measures
The construction and use of the proposed Pyrmont Bridge Road Tunnel Site (C9) will significantly affect the continued commercial viability of its business, and prevent the Malt Shovel Brewery business from pursuing its operational and development objectives for a financially significant period of time.  Any reduction to one shift per day because of supply or distribution restrictions resulting from the impacts of the WestConnex M4-M5 project would have significant impacts on production at the Malt Shovel Brewery.	As recommended in the Social and Economic Impact Technical Working Paper – Appendix P to the EIS, a Business Management Plan to manage, minimise and avoid potential construction effects on surrounding businesses should be prepared in consultation with affected businesses.
Potential for the demolition of the building directly to the north of the Malt Shovel Brewery and tunnelling for the temporary access tunnel beneath Parramatta Road to cause damage to	Expert pre- construction, mid- construction and post-construction dilapidation assessment prepared by structural/mechanical engineers should be prepared by the





**LION**

the fabric and structure of the Malt Shovel Brewery's early 19thC building and assets.	WestConnex contractor and provided to affected business and compensation made available for demonstrable damage to affected businesses.
Restriction on vehicle access for customer and loading and service vehicles arising from proposed traffic restrictions during the Malt Shovel Brewery's approved operating hours.	A construction traffic management plan specific to the C9 site should be prepared in consultation with affected businesses as part of the Business Management Plan.
Significant and ongoing dust impacts on the Malt Shovel Brewery during demolitions, excavations and spoil transport requiring continual wash down of premises and potential dust damage to machinery.	Any construction traffic management plan should include truck and street and footpath washing and erection of a wind sock to enable businesses to predict high level dust impacts from the construction site.
Noise impacts on the commercial and the proposed hospitality functions of the Malt Shovel Brewery to customer numbers and financial returns.	Further detail of noise impacts and conditions for the publication of regular noise monitoring results (taken at a range of times when local residents, patrons and workers are likely to be affected) should be imposed.
Potential for ongoing health impacts for workers from noise and dust impacts and for major safety breaches, eg. Explosions, gas leaks and the presence of asbestos and or other hazardous materials or substances emanating from the construction site affecting workers and patrons at local businesses, including the Malt Shovel Brewery.	Conditions should be imposed on the contractor to advise its contact details and to have protocols requiring it to advise local residents and businesses including Malt Shovel Brewery of all potential safety incidents.
Construction of an extra lane and driveway along the Parramatta Road frontage to enable access into the site for heavy vehicles and ongoing heavy vehicle access to the site 24/7 from the northern (eastbound) carriageway of Parramatta Road indicates that access to the frontage of the Malt Shovel Brewery at 188 Parramatta Road will be removed for the entirety of the construction period from Q2 2018 to Q4 2022 or severely impacted.	Early clarification should be given of any proposed acquisition of the road reserve and/or of the construction of a further lane on the road reserve obstructing access to 188 Parramatta Road or any other obstructions to entrances to the Malt Shovel premises on either Parramatta Road, Pyrmont Bridge Road or Gordon Lane should be provided and all accommodations made to avoid unreasonable impacts particularly to pedestrian and loading truck access which may affect the commercial viability of the business.





### **Traffic and parking impacts**

Lion is particularly concerned about the impact of the proposed road, traffic and parking modifications and restrictions and heavy truck movements on the continued commercial viability of the business and the role of the Malt Shovel Brewery in its education and marketing programs.

Lion, through its lawyers, has engaged Mr Ken Hollyoak of TTPP transport planning to prepare a report on the potential traffic and parking impacts of the WestConnex M4-M5 project on the operation of the Malt Shovel Brewery. A copy of Mr Hollyoaks report is **Annexure B** to this submission.

However, the lack of detailed information about the works actually proposed and dearth of actual environmental assessment of the impacts of those works has made this task very difficult. In particular, it is impossible to determine the extent of the impacts on the Parramatta Road frontage of the Malt Shovel Brewery due to the lack of detailed information about the nature of those works.

At present, it appears that construction of an extra lane and driveway along the Parramatta Road frontage to enable access into the site for heavy vehicles and ongoing heavy vehicle access 24/7 from the northern (eastbound) carriageway of Parramatta Road will remove access to the frontage of the Malt Shovel Brewery at 188 Parramatta Road for the entirety of the construction period from Q2 2018 to Q4 2022 or will severely impacted that access.

Early clarification should be given to Lion of any proposed acquisition of the road reserve and/or of the construction of a further lane on the road reserve obstructing access to 188 Parramatta Road or any other obstructions to entrances to the Malt Shovel premises on either Parramatta Road, Pyrmont Bridge Road or Gordon Lane should be provided and all accommodations made to avoid unreasonable impacts particularly to pedestrian and loading truck access which may affect the commercial viability of the business.

### **Our contacts**

If there are any queries arising from this submission please contact:

- myself at 02 8120 2338 or at [gary.faulkner@lionco.com](mailto:gary.faulkner@lionco.com); or
- Kristen Dumitrescu (Legal Counsel – Corporate) at 02 8284 3813 or at [Kristen.dumitrescu@lionco.com](mailto:Kristen.dumitrescu@lionco.com).

Yours faithfully

Gary Faulkner  
Brewery Director – Craft, Supply Chain

  
pp Hayden Morgan  
Head Brewer  
Malt Shovel Brewery



**LION**

**Annexure A - Lion preliminary submission on the impact on  
the Malt Shovel Brewery site and business of the proposed  
WestConnex M4-M5 Link project**



Minister for Planning and Environment  
Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2000  
**Attention:** Director, Transport & Strategic Infrastructure Planning

16 October 2017

Dear Sir

**WestConnex M4-M5 Link (SSI 16/7485) – preliminary submission on EIS public exhibition**

Lion-Beer, Spirits & Wine Pty Ltd (**Lion**) has operated the Malt Shovel Brewery, a craft brewery for James Squire craft beers, on the site of 99 Pyrmont Bridge Road at Camperdown since 1988 and from expanded premises incorporating 188 Parramatta Road and 95-101 Pyrmont Bridge Road since 2009.

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- The Malt Shovel Brewery is used to hold the historical documents and artefacts cataloguing the history and development of Lion's Hahn and James Squires beer brands.
- Over the last year, Lion has invested substantially in renovating the exterior and interior of the Malt Shovel Brewery and in securing a liquor license from the NSW Government with a view to opening the Malt Shovel Brewery to the public to experience our facilities through tastings, tours and food matching.

**Preliminary submission on the Environmental Impact Statement (EIS)**

This is Lion's preliminary submission on the EIS. Lion is currently having further information prepared to specify the impacts on the Malt Shovel Brewery site and business and seeks confirmation from the Department of Planning and Environment that a supplementary submission containing this supporting information to be lodged after the end of the public exhibition period on 16 October 2017 will be accepted and considered. Assuming the electronic submission function of the Major Projects Assessment website will

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be disabled from 17 October 2017, please advise where and to whom Lion's supplementary submission may be lodged.

### **Impacts from the proposed Pyrmont Bridge Road Tunnel Site (C9)**

The EIS identifies that the Malt Shovel Brewery premises will be located directly adjoining the proposed Pyrmont Bridge Road Tunnel Site (C9) and significant construction activities are proposed on the C9 site for a period of over four years from Q2 2018 to Q4 2022.

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Those concerns include:

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- Potential for major safety breaches, e.g. explosions, gas leaks and the presence of asbestos and or other hazardous materials or substances at or emanating from the construction site affecting workers and patrons at local businesses including Malt Shovel Brewery. Contact details and protocols to local residents and businesses including Malt Shovel Brewery advise on all potential safety incidents should be required.

#### **Our contacts**

If there are any queries arising from this submission please contact:

- myself at 02 8120 2338, [gary.faulkner@lionco.com](mailto:gary.faulkner@lionco.com); and
- Kristen Dumitrescu (Legal Counsel – Corporate), 02 8284 3183, [Kristen.dumitrescu@lionco.com](mailto:Kristen.dumitrescu@lionco.com).

Yours faithfully

Gary Faulkner  
Brewery Director – Craft, Supply Chain



**Annexure B - Report on the potential traffic and parking impacts of the WestConnex M4-M5 project on the operation of the Malt Shovel Brewery prepared by Mr Ken Hollyoak of TTPP transport planning**

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Lion Beer Australia  
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Our Ref: 17333

14 December 2017

King & Wood Mallesons  
Level 61, Governor Phillip Tower,  
1 Farrer Place,  
Sydney NSW 2000

**Attention: Trudy Sheehan**

Dear Trudy

**RE: MALT SHOVEL BREWERY  
WESTCONNEX CONSTRUCTION IMPACTS**

This submission has been prepared by the Transport Planning Partnership (TPPP) on behalf of Lion-Beer, Spirits & Wine Pty Ltd (Lion) in relation to the transport impacts of the WestConnex M4-M5 Link (SSI16/7485) and in particular the proposed construction compound (Pymont Bridge Road Tunnel Site (C9) on the operation of the Malt Shovel Brewery at 188 Parramatta Road and 95-101 Pymont Bridge Road.

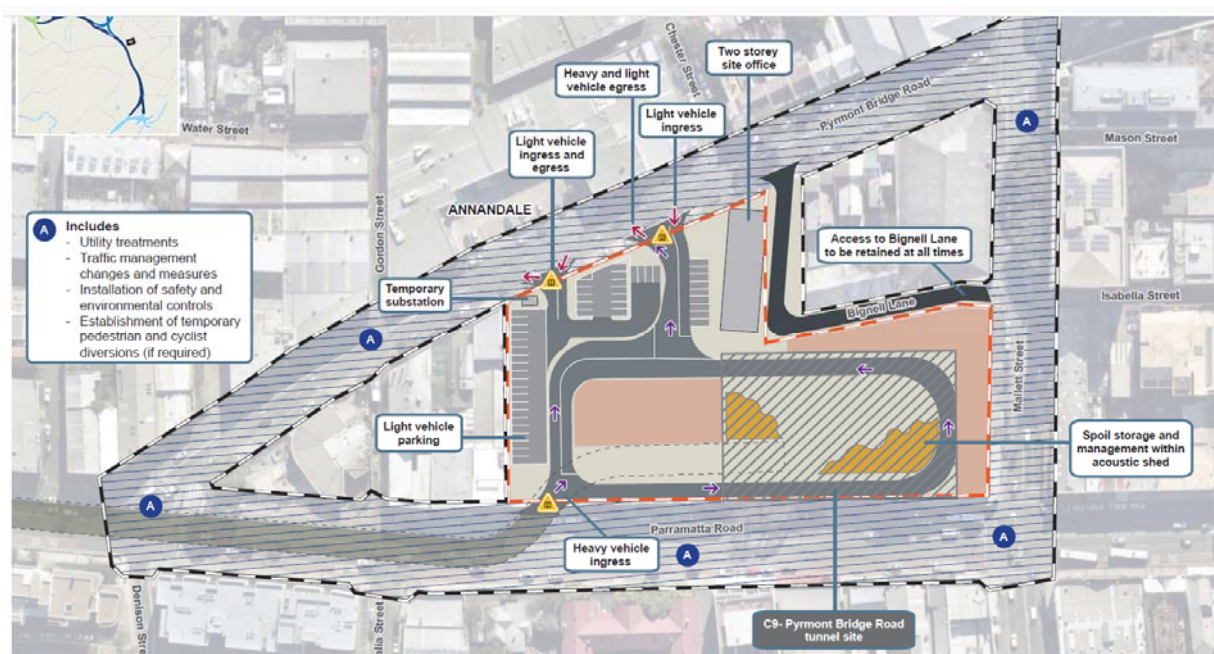
My view of the main transport issues raised in the Environmental Impact Statement (EIS) for the Malt Shovel Brewery are: -

- Traffic
  - The Traffic and Technical Working paper suggests there would be an average of 5.5 trucks per hour.
  - Whilst this average is based upon a 24-hour operation, the report notes that spoil removal will be removed through the day outside peak periods
  - In reality, therefore, the average number of trucks might be the best metric as the peak hour number of truck movements is likely to be higher than this (maybe 10-15 per hour)
- Parking
  - Likely additional demand from 100 construction workers
  - Potential alterations to parking availability which would affect the availability of parking for local residents and businesses

I have considered these main issues in more detail below.

## Additional Traffic

It is noted that the proposed access/egress arrangement for the WestConnex compound C9 has an entrance from Parramatta Road and an exit onto Pyrmont Bridge Road. A long gyratory road is provided within the C9 site to store the trucks so that they don't queue back onto Parramatta Road. There are 2 egresses from C9 onto Pyrmont Bridge Road with one serving a small staff car park and the other allowing trucks back onto the road network. The second egress onto Pyrmont Bridge Road is located around 35m from the approved Malt Shovel Brewery loading dock exit on the same side of Pyrmont Bridge Road.



It is noted that temporary traffic signals are proposed for the truck exit, but this does seem excessive for the anticipated number of trucks – my view is that they could be managed easily by a traffic controller. It is anticipated that all vehicles from the construction site will turn left out of the site directly past the Malt Shovel Brewery loading dock entry.

This does raise a potential issue with the current operation of the Brewery in which vehicles generally reverse into the loading dock. The current truck operation is conditioned in the development consent for the Brewery such that the reversing manoeuvre should be supervised/managed by an RTA accredited traffic controller, who is also to manage pedestrian traffic on the footpath.

The additional traffic from the directly adjacent construction site will be released from the site by means of traffic signals or a traffic controller. If a reversing manoeuvre into the Brewery loading dock is going on at that particular time, the traffic emerging from the construction site, which will be accelerating away from the site to join the main traffic flow, might be immediately confronted by a Brewery vehicle sitting in the road prior to reversing into the loading dock. This would result in a road safety issue.

I recommend that any traffic management strategies for C9 be prepared in consultation with the Malt Shovel Brewery to ensure a co-ordinated strategy to manage this potential issue.

### Loss of / Availability of Parking

The EIS notes the importation of around 100 contractors to the site. The EIS masterplan for C9 suggests that above 40 on-site parking spaces are being provided. This gives rise to potential for contractors parking off site which would put additional pressure on "on-street" car parking. There is no indication in the EIS of putting any significant measures in place to try and persuade workers to come to site in modes of transport other than the private car. TTPP has provided input into construction traffic management strategies for other projects to minimise construction vehicles on site which has resulted in text similar to below being inserted in planning documentation.

*All workers will be encouraged and expected to use public transport to travel to/from the site. This will be incorporated in the worker's induction program to ensure minimal parking impact on the surrounding streets.*

*Taking into consideration the above, it is proposed to implement the following measures to encourage workers to use public transport:*

- provide an on-site tool drop-off and storage facility to allow tradespeople to drop off and store their specific machinery for the project*
- inform staff during the induction and regular management meetings that no on-site car parking will be available and there is limited on-street car parking surrounding the site*
- instruct staff to use public transport to access the site during the induction and regular management meetings, and*
- display public transport timetable information at key locations within the work site and ensure that it is easily accessible by staff.*

It would be reasonable for the contract with the successful contractor to require similar measures to the above to reduce contractors on-street parking demand.



The availability of parking on Pymont Bridge Road and Parramatta Road outside of clearway times is very important for both customers and deliveries of the Malt Shovel Brewery. The Brewery currently has around 10 delivery movements during weekdays outside of clearway times. Customers and trade clients also access parking on Pymont Bridge Road outside of clearway times. It is important that the traffic management proposals retain such parking and ensure that the parking is not used by construction workers as the retention of this parking is crucial to the operation of the Brewery business.

Furthermore, it is not clear how access to the worksite from Parramatta Road will be achieved in so far as whether trucks will turn from the central traffic lane (thereby retaining kerbside parking) or whether any physical changes to the road (e.g. deceleration lane, wide entry radius) will be implemented resulting in loss of parking etc. The EIS makes a general statement " *Works would be carried out along Parramatta Road and Pymont Bridge Road to facilitate ingress and egress for construction traffic*". It would be necessary to involve Lion Brewery in these discussions in order that its continued operation can be maintained.

I trust the above is clear, but should you have any queries regarding the above or require further information, please do not hesitate to contact the undersigned on 8437 7800.

Yours sincerely,



**Ken Hollyoak**  
Director

**From:** [REDACTED]  
**Sent:** Mon, 16 Oct 2017 04:52:53 +0000  
**To:** [REDACTED]  
**Subject:** FW: Submission Details for Alexander Thomas (object)

**From:** system@acelo.com On Behalf Of Alexander Thomas  
**Sent:** Monday, 16 October 2017 3:43:08 PM (UTC+10:00) Canberra, Melbourne, Sydney  
**To:** [REDACTED]  
**Subject:** Submission Details for Alexander Thomas (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Alexander Thomas  
 [REDACTED]

Address:  
 [REDACTED]

Lilyfield, NSW  
 2040

Content:

When "the detail of the design and construction approach presented in this EIS is indicative only based on a concept design and would be subject to detailed design and construction planning to be undertaken by the successful contractors", there seems to be little if any point in commenting on the proposed alignments of the motorway, as these will be able to be changed at a whim in the future, without any further opportunities for the public to make submissions on these changes (the EIS makes it clear the only "consultation" at that time will be telling people what has been decided).

If the proposed alignments are in fact adopted, our home will be directly above a tunnel approximately 25 m wide, with four lanes of traffic plus extra widths arising from the merger of two 2-lane tunnels. Yet we have never been given the courtesy of any notification of this prior to this "concept design", which differs markedly from previous concept designs and which may well be changed significantly again. So much for "consultation"!

More importantly, this proposed southbound north-south tunnel, centred between Starling and Gladstone Streets in Lilyfield, would be directly under the upper (western) cliff-face of the old (19th century) Lilyfield quarry and less than 30-35 m horizontally from the much higher lower (eastern) cliff-face of this quarry, which drops vertically some 2-3 storeys immediately to the east of Gladstone Street and faces directly into numerous residences, subjecting them to a high likelihood of serious ground-vibration based noise. Yet no geotech tests have been carried out in this area, despite the high likelihood of facturing as a result of the quarrying techniques of the time (the nearest test sites were higher up the hill, not in the quarried area). This is a grossly unprofessional approach, potentially with serious consequences, as illustrated by the results of a similarly careless approach to geotech studies with the Lane Cove tunnel. Further, the EIS simply leaves this sort of testing in the future in the hands of the contractors.

This matter has been raised in earlier submissions, but has been ignored in the EIS, so no confidence can be placed in the EIS's "we are better at it now" spin on this matter.

The proponent should be required to (a) immediately release the details of the geotech studies carried out to date (there are no such details in the EIS); (b) publicly release all future geotech studies; and (c) publicly release all future proposed amendments to the project's alignments, with an adequate period for

public submissions in response, assessed by a truly independent agency, not RMS or SMC.

[REDACTED]  
Submission: Online Submission from Alexander Thomas (object)

[https://majorprojects.accelo.com/?action=view\\_activity&id=228149](https://majorprojects.accelo.com/?action=view_activity&id=228149)

Submission for Job: #7485 WestConnex M4-M5 Link

[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link

[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)



**From:** [REDACTED]  
**Sent:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** FW: Submission Details

**From:** system@accelo.com On Behalf Of [REDACTED]  
**Sent:** Monday, 16 October 2017 4:03:04 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: [REDACTED]

Address:

[REDACTED]

[REDACTED]

Content:

First request:

1st: Abolish the Iron Cove Bridge Link section.

This is already causing me personal hardship as I have been unable to sell my house based on the proposed plans even at a SUBSTANTIALLY lower price than neighbouring properties given I am in a high impact zone.

Assuming you don't listen to my feedback and it goes ahead, the requests, in order, are as below.

Double glazing on my property windows

Keep the cul-de-sac at the end of Clubb

No visually offensive concrete walls

Utilise sound preventing footpaths

IP Address: - [REDACTED]

Submission: Online Submission from [REDACTED] (object)

[https://majorprojects.accelo.com/?action=view\\_activity&id=228164](https://majorprojects.accelo.com/?action=view_activity&id=228164)

Submission for Job: #7485 WestConnex M4-M5 Link

[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link

[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)



**From:** [REDACTED]  
**Sent:** Mon, 16 Oct 2017 05:35:29 +0000  
**To:** [REDACTED]  
**Subject:** FW: Submission Details for Emma Wise of N/A (object)

**From:** system@acelo.com On Behalf Of Emma Wise  
**Sent:** Monday, 16 October 2017 4:32:01 PM (UTC+10:00) Canberra, Melbourne, Sydney  
**To:** [REDACTED]  
**Subject:** Submission Details for Emma Wise of N/A (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Emma Wise  
 Organisation: N/A (N/A)  
 [REDACTED]

Address:  
 [REDACTED]

Eastlakes, NSW  
 2018

Content:

I strongly object to this proposal in its entirety and agree with the National Trust of Australia (NSW) Policy on the Heritage Impacts of Urban Motorways, namely, "that massive expenditure on motorway development will divert much needed public and private investment away from public transport development which can move large numbers of people more effectively and with much less adverse heritage impact."

The planned garden suburb of Haberfield has been significantly impacted and will now be wedged against a massive swathe of asphalt cutting through the area, like the "eight lanes of shimmering cement" worshipped by Judge Doom in the film Who Framed Roger Rabbit. The EIS's heritage report also apparently 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.

We are choosing to build new motorways even as climate change is being acknowledged throughout the world as a legitimate concern and as other cities are struggling to deal with the adverse impacts of motorways they built at the height of the fossil fuel era.

For example, Seoul has decommissioned the motorway that cut through the centre of the city and replaced it with a green water park which follows the route of a river that once existed. Los Angeles is revitalising its public transport system and putting more than a billion dollars into revitalising the Los Angeles River, currently a dystopian gutter of concrete slashing through the city, see <https://www.theguardian.com/cities/2015/oct/23/frank-gehry-revitalise-los-angeles-la-river>

The money that is being spent on WestConnex would be enough to completely revitalise the Parramatta River so that it becomes the swimming hole and playground of Western Sydney, as proposed by councils in the Parramatta River Catchment Group.



Apparently the Sydney Motor Corporation was required to consider alternatives to these motorways and the City of Sydney came up with a well thought out alternative transport plan which has been ignored in the EIS. The Sydney Motorway Corporation should be required to engage with this plan and to respond to it.

We are fortunate that up until now Sydney's wind patterns and geography have helped dissipate the smog from our cars and other vehicles so that we don't generally suffer from the thick pollution that bedevils Los Angeles, but we can't rely on this situation to continue.

I object to pollution stacks being built to suck exhaust and particulates out of the tunnels into surrounding suburbs. Why should unfiltered pollution stacks be built anywhere in Sydney? Many of the current road tunnels warn drivers to close windows and turn on recycled air-conditioning. This is an indication to us all of the dangers in the exhaust our cars and trucks are emitting.

Sydney's population is increasing by more than 80,000 a year. Can we really expect roads to cope? More roads will simply encourage more cars and trucks to use the roads. Clearly what we need is a well-funded mass transit system. Sydneysiders embraced public transport during the Olympics, and we embrace public transport every New Year's Eve. We are ready for an affordable and efficient mass transit system. We are sick of driving.

It is clear that the future is public transport. Many young people I know can't drive and most can't afford a car in any case (given the cost of accommodation in Sydney). Young people want to sit on public transport and connect with other young people on their devices. They can't do this while driving.

NSW Planning must 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 damaged.

I object to the indicative design for the Rozelle Interchange. Apparently the 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.

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 and also be greatly increased if Stage 3 were ever completed. It states that Stage 3 would 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. 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 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 kill a vibrant Sydney area. In addition, the planned interchange at St Peters is very close to thousands of new apartments being built at Mascot, which have been well sited on a rail line to the city. These will be adversely impacted by the constant background roar of traffic and the traffic pollution.

I am concerned that the traffic figures relied upon in the EIS are simply not reliable. 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.

Congestion throughout Sydney is at road-rage levels. The social impact of a daily congested commute is huge and, with the population of Sydney rising at a rate of 80,000 a year, the social impact of choosing

motorways that will rapidly become congested in peak periods over a considered public transport solution will be huge.

The EIS also identifies a significant risk of leaks of contaminated water into Rozelle Bay and Alexandria Canal. Such risks to the health of Sydney's waterways are not acceptable to me.

I also object to the EIS on the grounds that it fails the Secretary's requirement for "meaningful" consultation. Meaningful consultation does not mean listen to what the community has to say and then carry on regardless. Hundreds of submissions on the concept design, including a major one from the Inner West Council, have been received, possibly even read, and then apparently ignored.

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.

Submission: Online Submission from Emma Wise of N/A (object)  
[https://majorprojects.accelo.com/?action=view\\_activity&id=228185](https://majorprojects.accelo.com/?action=view_activity&id=228185)

Submission for Job: #7485 WestConnex M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)

**From:** Emma Wise <campaigns@good.do>  
**Sent:** Monday, 16 October 2017 3:23 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.

SUBMISSION OF OBJECTION TO WESTCONNEX M4/M5 LINK EIS.

Most young people I know can't drive and can't afford a car in any case (given the cost of accommodation in Sydney).

Young people want to sit on public transport connecting with other young people on their devices. They can't do this while driving. The future is public transport.

Yours sincerely, Emma Wise 6 George St, Eastlakes NSW 2018, Australia

\_\_\_\_\_ This email was sent by Emma Wise 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 Emma provided an email address (emma.wise@bigpond.com) which we included in the REPLY-TO field.

Please reply to Emma Wise at emma.wise@bigpond.com.

To learn more about Do Gooder visit [www.dogooder.co](http://www.dogooder.co) To learn more about web protocol FC 3834 visit: [www.rfc-base.org/rfc-3834.html](http://www.rfc-base.org/rfc-3834.html)



**From:** [REDACTED]  
**Sent:** Mon, 16 Oct 2017 05:37:09 +0000  
**To:** [REDACTED]  
**Subject:** FW: Submission Details for Cushla Sewell (object)

**From:** system@accelo.com On Behalf Of Cushla Sewell  
**Sent:** Monday, 16 October 2017 4:04:02 PM (UTC+10:00) Canberra, Melbourne, Sydney  
**To:** [REDACTED]  
**Subject:** Submission Details for Cushla Sewell (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Cushla Sewell  
[REDACTED]

Address:  
[REDACTED]

Rozelle, NSW  
2039

Content:

I do not want to have the unfiltered WestConnex Iron stacks to be located on Terry Street. These stacks will be in close proximity to Rozelle Primary school and it is important for the health and welfare of these children to provide a safe and clean environment for them. Not only that there are also hundreds of residents in close proximity as well.

These stacks should be located to a more appropriate location.

[REDACTED]  
Submission: Online Submission from Cushla Sewell (object)  
[https://majorprojects.accelo.com/?action=view\\_activity&id=228166](https://majorprojects.accelo.com/?action=view_activity&id=228166)

Submission for Job: #7485 WestConnex M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)

**From:** [REDACTED]  
**Sent:** Mon, 16 Oct 2017 05:59:18 +0000  
**To:** [REDACTED]  
**Subject:** FW: Submission Details for Jude Stoddart of Citizen (object)

**From:** system@acelo.com On Behalf Of Jude Stoddart  
**Sent:** Monday, 16 October 2017 4:57:01 PM (UTC+10:00) Canberra, Melbourne, Sydney  
**To:** [REDACTED]  
**Subject:** Submission Details for Jude Stoddart of Citizen (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Jude Stoddart  
 Organisation: Citizen ()

Address:

Sydney, NSW  
 2039

Content:

Not sure if first submission went through in complete form-  
 Attn: Secretary, re: WestConnex M4/M5 EIS, Project Number SSI 16\_7485.

Objection to WestConnex M4/M5 LINK EIS.

The entire proposal for WestConnex is a misguided use of public funds and I completely object to this project overall and specifically to the Stage 3 proposal. I have raised a number of concerns below that I wish to have answered fully, along with your responses to all the issues raised by other objectors to this costly and inappropriate project.

I am an Inner West resident and am directly affected by the proposed complex plan for the Stage 3 of Westconnex and in particular the Iron-Cove to Rozelle link, the Rozelle Interchange and proposed links to the Western Harbour Tunnel.

The Secretary of Planning must advise the Minister to reject the EIS and refuse the application. Below are some of the key concerns. However my primary concern is that this project is going to consume somewhere between \$40 billion and \$50 billion of public money and is not going to address the current or future transport needs of people in either the inner or outer West. I understand from information available that no comparative costings were ever done on the provision of an improved and enhanced public & commercial rail transport system to cater for the needs of people and industry in the expanding West of the city. Similarly I understand there has been cost benefit analysis of the merits in using some of this \$50 million (achieved through the sale of public assets) to improve our health, education and community facilities in our more disadvantaged areas.

Some major objections about the project:

1. Consultation Failure: I object on the grounds that there has been a failure to consult properly and honestly with the Communities impacted by WestConnex, and there has been a denial of access to adequate channels for community representation, especially in the early part of the project. The State Government has a responsibility to ensure that either through its mechanisms/ agents for project development /management that people being impacted by significant changes are fully consulted on the future of their communities. The public 'Consultations' undertaken have failed to provide avenues for any real community contribution or discussion; there is no confidence in the community that its needs have been heard nor its interests represented.

a. Information circulated on the consultations was haphazard and many people failed to receive information in sufficient time for them to participate.

b. The public meetings were speedily replaced by a system of information boards in local community town halls, with 'experts' available for discussion (if you could wait for the queue). This approach only permitted local citizens to respond verbally or with comments on paper 'stickies', which meant that any picture of the collective response was lost, and people lost confidence that any views expressed would be translated into the 'write-ups' after.

c. The scale of the Stage 3 project and its huge implications developed increased massively between the two consultations in the Balmain/ Rozelle area, which resulted in significant local concern being expressed at the short 'consultation' organised around June 2017. This meeting was abruptly foreshortened by the organisers when unsurprisingly there was a 2 minute staged outburst by anti-Westconnex people. The consultation team closed the event 30 minutes early, thus denying working people any opportunity to view these dramatic changes.

d. The Leichardt Council and Councillors were disbanded unilaterally by the Premier/ NSW Govt as part of the Council reorganisations and we, as a community were left with no opportunities for getting our views expressed through direct local representation during the critical 18 mths in the development and significant expansion of the Westconnex in our area.

e. The Current EIS was produced in a ridiculously short time post the closure of Submissions regarding the Concept Design. The ten days or so left virtually no time for the significant number of the concerns raised in these submissions to be taken on board.

f. The current length and inaccessibility of the EIS makes it almost impossible for members of the public to read and understand it within the necessary timeframe. While some copies are made available and there have been limited community consultations - this stage has allowed insufficient opportunity for community consideration and feedback.

g. More importantly 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.

Question: What opportunities will there be for local communities affected to hear responses to their concerns raised in this submission process in an accessible manner (not a 7500 page document) and, for us to be consulted about ongoing changes to the detailed plans and construction methodologies for specific areas, so that it is not left to the desires of construction contractors (who will be driven by concerns that ignore the social and community impact).

2. Creating a no-go zone and destroying our communities: The extensive construction process and number of sites on and around the Rozelle - Iron Cove peninsula will put our community under considerable stress and cause significant deterioration in people's everyday lives. We will be badly affected by the siting of at least 3 construction areas at key entry and exit points for the peninsula; the huge number of truck movements required 24 hours a day to remove tunnel spoil and the associated unacceptable levels of noise and air pollution caused by such traffic; the extensive 24 hr drilling ( with possible subsidence); the entry and exist of significant numbers of cars and light vehicles for workers and associated parking problems in a small area in an already busy community; and with the prospect of this continuing for at least 5+ years.

Question: If this unviable project goes ahead what actions will be taken to ensure that noise and air pollution will be kept to the minimum, and that controls put in place to limit the negative impact of



construction work locally and to provide clear channels for community concerns to be raised and action taken by the responsible bodies.

3. The air pollution during and post construction are unacceptable.

The number and scale and lack of filtering on the planned air/exhaust stacks is unacceptable, Diesel particulates are a known carcinogen, and are cumulative. With three air/exhaust stacks being planned within the Rozelle area, we, as a community, are deeply concerned for the health and well-being of our children, the elderly and people with respiratory problems. As someone with allergic rhinitis, I am not sure that I will be able to remain in my own home during the construction work, leave alone when the air/exhaust stacks are in operation. As a retiree I resent that I may be forced out of my home, by the pollution and noise, or face having my health put in jeopardy at this time in my life. Why if it is unacceptable to have such air/exhaust stacks in the North Shore near schools and communities, it is deemed suitable for Rozelle.

4. Likelihood of significant subsidence: it appears that the extensive tunnel proposed for the Rozelle peninsula is likely to result in subsidence in our community around the interchanges and associated tunnels. Figure 12-18 (on page 12-44, in Chapter 12 Land Use & Property within Volume 1B) and the recent publicity around the questionable build-ability of the underground spaghetti junction of Rozelle interchange raises major concerns for our community.

Firstly, the given estimates of subsidence (10-50mm) are significant and enough to do real damage even at the lowest levels. However it is understood that the elaborate network of tunnels is technically extremely challenging and no one at present is in a position to say categorically that resulting subsidence will not be greater than the lowest estimate given. It is understood that residents in the Haberfield area are currently finding significant subsidence issues without any recourse to adequate avenues for restoration and /or compensation. This situation is untenable and must be fixed for all Stages. The State Government has a responsibility to ensure that compensation funds and accessible mechanisms exist to fully cover all subsidence damage to private dwellings.

I request again that the Minister reject this EIS outright, and call for an independent inquiry into WestConnex immediately.

Your sincerely  
Jude Stoddart  
Resident of Rozelle

  
Submission: Online Submission from Jude Stoddart of Citizen (object)  
[https://majorprojects.accelo.com/?action=view\\_activity&id=228213](https://majorprojects.accelo.com/?action=view_activity&id=228213)

Submission for Job: #7485 WestConnex M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)

**From:** [REDACTED]  
**Sent:** Mon, 16 Oct 2017 07:00:53 +0000  
**To:** [REDACTED]  
**Subject:** FW: Submission Details for Jude Stoddart of citizen (object)

**From:** system@acelo.com On Behalf Of Jude Stoddart  
**Sent:** Monday, 16 October 2017 4:53:04 PM (UTC+10:00) Canberra, Melbourne, Sydney  
**To:** [REDACTED]  
**Subject:** Submission Details for Jude Stoddart of citizen (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Jude Stoddart  
 Organisation: citizen ()  
 [REDACTED]

Address:  
 [REDACTED]

Sydney, NSW  
 2039

Content:  
 Attn: Secretary, re: WestConnex M4/M5 EIS, Project Number SSI 16\_7485.

Objection to WestConnex M4/M5 LINK EIS.

The entire proposal for WestConnex is a misguided use of public funds and I completely object to this project overall and specifically to the Stage 3 proposal. I have raised a number of concerns below that I wish to have answered fully, along with your responses to all the issues raised by other objectors to this costly and inappropriate project.

I am an Inner West resident and am directly affected by the proposed complex plan for the Stage 3 of Westconnex and in particular the Iron-Cove to Rozelle link, the Rozelle Interchange and proposed links to the Western Harbour Tunnel.

The Secretary of Planning must advise the Minister to reject the EIS and refuse the application. Below are some of the key concerns. However my primary concern is that this project is going to consume somewhere between \$40 billion and \$50 billion of public money and is not going to address the current or future transport needs of people in either the inner or outer West. I understand from information available that no comparative costings were ever done on the provision of an improved and enhanced public & commercial rail transport system to cater for the needs of people and industry in the expanding West of the city. Similarly I understand there has been cost benefit analysis of the merits in using some of this \$50 million (achieved through the sale of public assets) to improve our health, education and community facilities in our more disadvantaged areas.

Some major objections about the project:

1. Consultation Failure: I object on the grounds that there has been a failure to consult properly and

honestly with the Communities impacted by WestConnex, and there has been a denial of access to adequate channels for community representation, especially in the early part of the project. The State Government has a responsibility to ensure that either through its mechanisms/ agents for project development /management that people being impacted by significant changes are fully consulted on the future of their communities. The public 'Consultations' undertaken have failed to provide avenues for any real community contribution or discussion; there is no confidence in the community that its needs have been heard nor its interests represented.

a. Information circulated on the consultations was haphazard and many people failed to receive information in sufficient time for them to participate.

b. The public meetings were speedily replaced by a system of information boards in local community town halls, with 'experts' available for discussion (if you could wait for the queue). This approach only permitted local citizens to respond verbally or with comments on paper 'stickies', which meant that any picture of the collective response was lost, and people lost confidence that any views expressed would be translated into the 'write-ups' after.

c. The scale of the Stage 3 project and its huge implications developed increased massively between the two consultations in the Balmain/ Rozelle area, which resulted in significant local concern being expressed at the short 'consultation' organised around June 2017. This meeting was abruptly foreshortened by the organisers when unsurprisingly there was a 2 minute staged outburst by anti-Westconnex people. The consultation team closed the event 30 minutes early, thus denying working people any opportunity to view these dramatic changes.

d. The Leichardt Council and Councillors were disbanded unilaterally by the Premier/ NSW Govt as part of the Council reorganisations and we, as a community were left with no opportunities for getting our views expressed through direct local representation during the critical 18 mths in the development and significant expansion of the Westconnex in our area.

e. The Current EIS was produced in a ridiculously short time post the closure of Submissions regarding the Concept Design. The ten days or so left virtually no time for the significant number of the concerns raised in these submissions to be taken on board.

f. The current length and inaccessibility of the EIS makes it almost impossible for members of the public to read and understand it within the necessary timeframe. While some copies are made available and there have been limited community consultations - this stage has allowed insufficient opportunity for community consideration and feedback.

g. More importantly 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.

Question: What opportunities will there be for local communities affected to hear responses to their concerns raised in this submission process in an accessible manner (not a 7500 page document) and, for us to be consulted about ongoing changes to the detailed plans and construction methodologies for specific areas, so that it is not left to the desires of construction contractors (who will be driven by concerns that ignore the social and community impact).

2. Creating a no-go zone and destroying our communities: The extensive construction process and number of sites on and around the Rozelle - Iron Cove peninsula will put our community under considerable stress and cause significant deterioration in people's everyday lives. We will be badly affected by the siting of at least 3 construction areas at key entry and exit points for the peninsula; the huge number of truck movements required 24 hours a day to remove tunnel spoil and the associated unacceptable levels of noise and air pollution caused by such traffic; the extensive 24 hr drilling ( with possible subsidence); the entry and exist of significant numbers of cars and light vehicles for workers and associated parking problems in a small area in an already busy community; and with the prospect of this continuing for at least 5+ years.

Question: If this unviable project goes ahead what actions will be taken to ensure that noise and air pollution will be kept to the minimum, and that controls put in place to limit the negative impact of construction work locally and to provide clear channels for community concerns to be raised and action



taken by the responsible bodies.

3. The air pollution during and post construction are unacceptable.


The number and scale and lack of filtering on the planned air/exhaust stacks is unacceptable, Diesel particulates are a known carcinogen, and are cumulative. With three air/exhaust stacks being planned within the Rozelle area, we, as a community, are deeply concerned for the health and well-being of our children, the elderly and people with respiratory problems. As someone with allergic rhinitis, I am not sure that I will be able to remain in my own home during the construction work, leave alone when the air/exhaust stacks are in operation. As a retiree I resent that I may be forced out of my home, by the pollution and noise, or face having my health put in jeopardy at this time in my life. Why if it is unacceptable to have such air/exhaust stacks in the North Shore near schools and communities, it is deemed suitable for Rozelle.

4. Likelihood of significant subsidence: it appears that the extensive tunnel proposed for the Rozelle peninsula is likely to result in subsidence in our community around the interchanges and associated tunnels. Figure 12-18 (on page 12-44, in Chapter 12 Land Use & Property within Volume 1B) and the recent publicity around the questionable build-ability of the underground spaghetti junction of Rozelle interchange raises major concerns for our community.

Firstly, the given estimates of subsidence (10-50mm) are significant and enough to do real damage even at the lowest levels. However it is understood that the elaborate network of tunnels is technically extremely challenging and no one at present is in a position to say categorically that resulting subsidence will not be greater than the lowest estimate given. It is understood that residents in the Haberfield area are currently finding significant subsidence issues without any recourse to adequate avenues for restoration and /or compensation. This situation is untenable and must be fixed for all Stages. The State Government has a responsibility to ensure that compensation funds and accessible mechanisms exist to fully cover all subsidence damage to private dwellings.

I request again that the Minister reject this EIS outright, and call for an independent inquiry into WestConnex immediately.

Your sincerely  
Jude Stoddart  
Resident of Rozelle

  
Submission: Online Submission from Jude Stoddart of citizen (object)  
[https://majorprojects.accelo.com/?action=view\\_activity&id=228207](https://majorprojects.accelo.com/?action=view_activity&id=228207)

Submission for Job: #7485 WestConnex M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)

**From:** [REDACTED]  
**Sent:** Mon, 16 Oct 2017 05:59:30 +0000  
**To:** [REDACTED]  
**Subject:** FW: Submission Details for company Forest Lodge Public School Parents & Citizens Association (org\_support)  
**Attachments:** 228215\_Forest Lodge P & C Association \_2017Oct16\_1658.pdf

**From:** system@acelo.com On Behalf Of Antigone Foster  
**Sent:** Monday, 16 October 2017 4:59:08 PM (UTC+10:00) Canberra, Melbourne, Sydney  
**To:** [REDACTED]  
**Subject:** Submission Details for company Forest Lodge Public School Parents & Citizens Association (org\_support)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Antigone Foster  
 Organisation: Forest Lodge Public School Parents & Citizens Association (Vice President)  
 Govt. Agency: No  
 [REDACTED]

Address:  
 [REDACTED]

Forest Lodge, NSW  
 2037

Content:  
 Antigone Foster  
 Vice President  
 Forest Lodge P & C  
 Corner Ross St and Bridge Roads  
 Forest Lodge NSW 2037  
 antigonefoster@gmail.com

Monday 16 October 2017

Director, Transport Assessments Planning Services  
 Department of Planning and Environment

RE: Application No. SSI 7485 Submission

Dear Sir / Madam

I am writing on behalf of the Forest Lodge P&C Association to express our utmost concern about the proposed Environmental Impact Statement and Concept Design of WestConnex.

As a parent and community body of a primary school identified as being in a highly effected zone of this project, we assert our great concerns as below:

1. That the government is utilising an outrageous amount of funds from the public purse to invest in infrastructure for use by private not public modes of transportation
2. That it is proposing to incorporate the use of unfiltered pollution stacks directly into the lungs of young children as they play and learn at school, in their homes and in their community. The current map places stacks immediately adjacent to Rozelle Public and St Peter's Public Schools, and scores of other schools such as Forest Lodge are also significantly exposed. We assert that this proposition is nothing short of criminal; it is an act of malice that poisons the lives and livelihoods of the children of western Sydney.
3. We are extremely concerned about the airborne, noise and light pollution - during both day and night - of the Dive Site proposed at the corner of Parramatta Road & Bridge Road. This is less than 1 km from our school where 350 children are enrolled in a high-density urban playground plus a heavily attended before and after school program. There will be a massive increase of diesel-fuelled traffic on surrounding roads including Bridge Road and Ross St. The health hazards for young lungs of diesel airborne pollutants is well documented. Should we have to accept that just because we send our children to this school we are potentially exposing them to future risks of lung disease?
4. After the burdened years of construction and going live, there will then be the ongoing cost of rat running by drivers avoiding excessive tolls, further decreasing air and ambient quality of life for our children.

Forest Lodge P & C Association strongly condemns the proposal of WestConnex and urges the government to reconsider their position on the lives of children living in the inner west of Sydney. They deserve better.

Yours sincerely

Antigone Foster  
Vice President  
On behalf of Forest Lodge P & C Association

[REDACTED]  
Submission: Online Submission from company Forest Lodge Public School Parents & Citizens Association (org\_support)

[https://majorprojects.accelo.com/?action=view\\_activity&id=228215](https://majorprojects.accelo.com/?action=view_activity&id=228215)

Submission for Job: #7485 WestConnex M4-M5 Link

[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link

[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)



Antigone Foster  
Vice President  
Forest Lodge P & C  
Corner Ross St and Bridge Roads  
Forest Lodge NSW 2037  
antigonefoster@gmail.com

Monday 16 October 2017

Director, Transport Assessments Planning Services  
Department of Planning and Environment

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Dear Sir / Madam

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As a parent and community body of a primary school identified as being in a highly effected zone of this project, we assert our great concerns as below:

1. That the government is utilising an outrageous amount of funds from the public purse to invest in infrastructure for use by private not public modes of transportation
2. That it is proposing to incorporate the use of **unfiltered pollution stacks** directly into the lungs of young children as they play and learn at school, in their homes and in their community. The current map places stacks immediately adjacent to Rozelle Public and St Peter's Public Schools, and scores of other schools such as Forest Lodge are also significantly exposed. We assert that this proposition is nothing short of criminal; it is an act of malice that poisons the lives and livelihoods of the children of western Sydney.
3. We are extremely concerned about the airborne, noise and light pollution – during both day and night - of the Dive Site proposed at the corner of Parramatta Road & Bridge Road. **This is less than 1 km from our school** where 350 children are enrolled in a high-density urban playground plus a heavily attended before and after school program. There will be a massive increase of diesel-fuelled traffic on surrounding roads including Bridge Road and Ross St. **The health hazards for young lungs of diesel airborne pollutants is well documented.** Should we have to accept that just because we send our children to this school we are potentially exposing them to future risks of lung disease?
4. After the burdened years of construction and going live, there will then be the ongoing cost of rat running by drivers avoiding excessive tolls, further decreasing air and ambient quality of life for our children.

Forest Lodge P & C Association strongly condemns the proposal of WestConnex and urges the government to reconsider their position on the lives of children living in the inner west of Sydney. They deserve better.

Yours sincerely

Antigone Foster  
Vice President  
On behalf of Forest Lodge P & C Association

**From:** [REDACTED]  
**Sent:** Mon, 16 Oct 2017 06:07:57 +0000  
**To:** [REDACTED]  
**Subject:** FW: Submission Details for Kim Logan (object)  
**Attachments:** 228230\_Kim Logan Westconnex Stage 3 Objection\_2017Oct16\_1701.pdf

**From:** system@accelo.com On Behalf Of Kim Logan  
**Sent:** Monday, 16 October 2017 5:02:12 PM (UTC+10:00) Canberra, Melbourne, Sydney  
**To:** [REDACTED]  
**Subject:** Submission Details for Kim Logan (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Kim Logan  
[REDACTED]

Address:  
[REDACTED]

Liyfield, NSW  
2040

Content:  
See attached

[REDACTED]  
Submission: Online Submission from Kim Logan (object)  
[https://majorprojects.accelo.com/?action=view\\_activity&id=228230](https://majorprojects.accelo.com/?action=view_activity&id=228230)

Submission for Job: #7485 WestConnex M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)



Kim Logan  
101-103 Cecily Street  
Lilyfield NSW 2040

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 Lilyfield for over 20 years at our home at [101-103 Cecily Street](#). Lilyfield and 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.

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.

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.

1. 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 fails to deliver on its objectives. 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 behaviour is called 'peak spreading'. . ." This is a categorical admission of failure of this complete project.

2. 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.

3. 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.

4. 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.

5. 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.

6. 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.

7. Many homes around the Iron Cove Link, 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.

8. There are two areas in the Rozelle Rail Yards site where construction will be by cut and cover. These are the Portals for the Western Harbour Tunnel and the Portals for the M4/M5 link. This is of particular concern in the light of residents experiences in areas of Haberfield and St Peters where highly contaminated land areas were being disturbed. There was totally inadequate control of dust in these areas, where the dust would have been loaded with toxic chemical particulates. The old Rail Yards are highly contaminated land from their past use. The EIS gives no specific details of how this highly toxic threat is going to be securely managed. It is not acceptable for this to be decided only when the Construction Contracts have been issued, when the community will have no say or control over the methodology to be employed for removing vast amounts of contaminated spoil.

9. The Rozelle Rail Yards site is the location of 3 Unfiltered Pollution Stacks. There is a fourth unfiltered stack between Callan and Springside Streets on Victoria Rd. 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 jeopardise 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. 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. Paul Torzillo, Head of Respiratory medicine at Royal Prince Albert Hospital has stated that heart disease will skyrocket due to air pollution caused by Westconnex bringing more cars into the Inner West.

10. The Health costs of outdoor Air Pollution in Australia are up to \$8.4 Billion a year. The Health costs of Particulate Pollution in the Sydney Greater Metropolitan area is around \$4.7 Billion a year. With no filtration on the Westconnex tunnels these Health costs will rise substantially.

11. The EIS shows a diagrammatic explanation of the way the polluted air will be expelled from the Westconnex tunnels. This method will work on straight tunnels of short distance providing there is no traffic congestion. There are already signs in tunnel locations in Sydney advising motorists to roll up their windows and put on their 'in vehicle circulating' air conditioning. This type of straight line pollution expulsion doesn't work if the tunnels go around corners, which is the case with the tunnels from the Rozelle Rail Yards site.



12. 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.

13. 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.

14. 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 totally inappropriate and demonstrates that those who have put these plans together are not in touch with reality! At a time when major World cities are doing all they can to address the dire problems of pollution this is an appalling suggestion.

15. 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.

16. Generally the risk of settlement is lessened where tunnelling is more than 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 tunnelling 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.

17. 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.

In summary my key Issues are:

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



I completely oppose the Iron Cove Tunnel Link below Rozelle.

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

I completely oppose the Rozelle interchange and the tunnels below my houses.

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

I demand an independently prepared detailed professional dilapidation report be carried out on my houses prior to any construction progressing.

I demand compensation should my houses be damaged by this proposal.

I demand the State government compensate me for the loss of value of my properties, stress and anxiety caused by this proposal, inconvenience and disruption to me and my family's lives, noise, vibration, 24 hour construction activity and loss of wellbeing and quality of our lives.

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

Sincerely,

Kim Logan

**From:** [REDACTED]  
**Sent:** Mon, 16 Oct 2017 06:08:18 +0000  
**To:** [REDACTED]  
**Subject:** FW: Submission Details for company Urbis on behalf of Desane Group Holdings Ltd (org\_object)  
**Attachments:** 228193\_Desane Submission to SSI 16\_7485\_2017Oct16\_1644.pdf

**From:** system@accelo.com On Behalf Of Urbis on behalf of Desane Group Holdings Ltd Company  
**Sent:** Monday, 16 October 2017 4:45:32 PM (UTC+10:00) Canberra, Melbourne, Sydney  
**To:** [REDACTED]  
**Subject:** Submission Details for company Urbis on behalf of Desane Group Holdings Ltd (org\_object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Urbis on behalf of Desane Group Holdings Ltd Company  
 Organisation: Urbis on behalf of Desane Group Holdings Ltd (Consultant)  
 Govt. Agency: No  
 [REDACTED]

Address:

[REDACTED]

Sydney, NSW  
 2000

Content:  
 Refer to attached submission

[REDACTED]  
 Submission: Online Submission from company Urbis on behalf of Desane Group Holdings Ltd (org\_object)

[https://majorprojects.accelo.com/?action=view\\_activity&id=228193](https://majorprojects.accelo.com/?action=view_activity&id=228193)

Submission for Job: #7485 WestConnex M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)

# **SUBMISSION TO SSI 16\_7485 RELATING TO WESTCONNEX M4-M5 LINK**

16 OCTOBER 2017  
SA6946  
FINAL  
PREPARED FOR DESANE GROUP HOLDINGS LTD

**URBIS**



**URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:**

Director	Clare Brown
Consultant	Emma Fitzgerald
Project Code	SA6946
Report Number	Submission to SSI 16_7485

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# EXECUTIVE SUMMARY

This submission has been prepared by Urbis Pty Ltd (**Urbis**) on behalf of Desane Group Holdings Ltd (**Desane**) in response to the exhibition of critical State significant infrastructure application under Part 5.1 of the *Environmental Planning & Assessment Act 1979 (EP&A Act)* (SSI 16\_7485) for the construction and operation of the M4-M5 Link. This project would comprise a new, tolled multi-lane road link between the proposed M4 East at Haberfield and the proposed new M5 at St Peters including a new surface interchange at Rozelle (Rozelle Interchange). This submission is an objection to SSI 16\_7485 and identifies the following inadequacies in the material supporting SSI 16\_7485 and deficiencies in the Project itself:

- Documentary deficiencies:
  - Lack of sufficient detail in the EIS;
  - Inconsistency with the requirements of the Secretary's Environmental Assessment Requirements issued by the Department for the Project dated 3 May 2017;
  - Lack of consistency with Business Case;
  - Impacts on the Bays Precinct & Urban Renewal;
  - Inconsistency with Statutory and Strategic Documents;
  - Lack of sufficient assessment of strategic alternatives;
  - Poor traffic modelling;
  - Lack of Construction Traffic & Access Management Plan;
  - Uncertain Operational Road Network Review;
  - Lack of clarity on for Heavy Vehicle Usage;
  - Lack of comprehensive Climate Change Risk Assessment;
  - Insufficient assessment of impacts including on human health;
  - Lack of meaningful assessment of impacts to Sydney Metro West; and
  - Failure to integrate considerations of potential impacts on future trends in transport.
- Design and Project deficiencies:
  - Poor planning, construction delivery and funding mechanisms;
  - Failure to deliver Project objectives;
  - Poor Project design;
  - Traffic generation & increased congestion;
  - Lack of sufficient capacity to future proof Project;
  - Impact on air quality;
  - Ongoing operational noise; and
  - Unnecessary compulsory acquisition of property and unofficial value capture mechanisms.

Until such a time as all the issues raised in this submission have been comprehensively addressed and resolved, the application is not capable of approval by a reasonable consent authority.

The WestConnex program of works has been split into three stages:

1. **M4 Widening and M4 East:** Widening the existing M4 Motorway from Parramatta to Homebush from three to four lanes in each direction and extending the M4 Motorway in tunnels between Homebush and Haberfield via Concord. This includes provision for the future connection to M4–M5 Link. The project is about 6.5km long (with 5.5km of the motorway in tunnel). The M4 East is the first underground section of WestConnex.
2. **New M5:** New multi lane twin motorway tunnels between the M5 East Motorway (east of King Georges Road, Beverly Hills and Bexley Road, Bexley) and St Peters, and a new road interchange and upgrade

of local roads at St Peters to connect to Campbell Road and Euston Road, St Peters and Gardeners Road, Mascot.

3. **M4-M5 Link (SSI 16\_7485):** Tunnels connecting to the M4 East at Haberfield and New M5 at St Peters via Rozelle. Includes an interchange at Rozelle with provision for a future connection to the Western Harbour Tunnel and Beaches Link. The Project also includes an underground tunnel from the Rozelle Interchange to Iron Cove Bridge. This Project has then been split further into:

**Stage 1:** Construction of the mainline tunnels between the M4 East at Haberfield and the New M5 at St Peters, stub tunnels to the Rozelle interchange (at the Inner West subsurface interchange) and ancillary infrastructure at the Darley Road motorway operations complex (MOC1) and Campbell Road motorway operations complex (MOC5).

For clarity this is referred to as **Phase 1** in this submission.

**Stage 2:** Construction of the Rozelle interchange and the Iron Cove Link including: connections to the stub tunnels at the Inner West subsurface interchange (built during Stage 1); ancillary infrastructure at the Rozelle West motorway operations complex (MOC2), Rozelle East motorway operations complex (MOC3) and the Iron Cove Link motorway operations complex (MOC4); connections to the surface road network at Lilyfield and Rozelle and construction of tunnels, ramps and associated infrastructure as part of the Rozelle interchange to provide connection to the proposed future Western Harbour Tunnel and Beaches Link project.

For clarity this is referred to as **Phase 2** in this submission.

# 1. INTRODUCTION

Desane is a diversified property company listed on the Australian Securities Exchange (ASX Code: DGH) specialising in property development and property investment.

Desane has a keen interest in the regulatory and policy framework impacting its assets, including strategic and statutory planning. Desane has long favoured a proactive and cooperative approach to working with all levels of government to achieve the highest quality outcomes. This is evidenced in Desane's delivery of highly successful, city-shaping projects in locations across the Sydney Metropolitan area including Lane Cove, Annandale, Rozelle and Camperdown.

Desane has appointed Urbis to review exhibition material and prepare a submission in response to the critical State infrastructure project SSI 16\_7485 relating to Stage 3 of WestConnex, the M4-M5 Link (**the Project**). The Project is described on the Department of Planning and Environment's (**the Department**) Major Projects website as *"Roads and Maritime Services propose to construct and operate the M4-M5 Link which would comprise a new, tolled multi-lane road link between the proposed M4 East at Haberfield and the proposed New M5 at St Peters."*

Urbis brings an appreciation of the strategic and statutory planning process to the review while Desane brings extensive expertise in property development and property investment, and a deep knowledge of its assets which will be impacted by the Project, namely 68-72 Lilyfield Road, Rozelle (**property**). The property has been designated as a site within the Project footprint to be compulsorily acquired to facilitate construction of the Rozelle Interchange as part of Phase 2 of the Project.

The property sits on the south-eastern corner of the intersection of Lilyfield Road and Gordon Street. It has an irregular triangle shape with an area of 5,274sqm, and an approximate 100 metre frontage to Lilyfield Road and 70 metre frontage to Gordon Street as shown in **Figure 1** below. Vehicle and pedestrian access is available from both street frontages.

The property slopes south and south west towards the rail yards and has been the subject of historical excavation to facilitate the current site development. On the southern boundary of the site is a steep escarpment which physically and visually separates the site from the former Rozelle Rail Yards.

The property is located approximately 3km west of the Sydney CBD. It is approximately 200 metres east of Victoria Road, with land uses along the corridor primarily comprising residential and commercial uses.

The property is the subject of a current Planning Proposal to amend the provisions of Sydney Regional Environmental Plan No 26—City West (**SREP 26**) (**PSA**) which was lodged with the Department on 5 June 2015 to rezone the land from 'Ports and Employment' to either a standard instrument B4 Mixed Use zoning or alternatively the inclusion of a new schedule into SREP 26 allowing for additional uses to be developed on site including residential, commercial and retail uses.

Desane is not in principal against the concept of WestConnex, however objection is raised to both the current design of the Project and the way in which activities associated with the Project have been and continue to be conducted.

This submission constitutes a formal objection to SSI 16\_7485 as lodged by Roads and Maritime Services (**RMS**) with the Department and publicly exhibited between 18 August 2017 and 16 October 2017.



Figure 1 - 68-72 Lilyfield Road, Rozelle – looking east along Lilyfield Road. Property is outlined in red.



Source: Desane

## 2. DEFICIENCY OF EIS

This section documents issues identified in the review of the Environmental Impact Statement (EIS), including: a lack of detail, inconsistency with the requirements of the revised Secretary's Environmental Assessment Requirements (SEARs), inconsistency with details of the Business Case and failures to address all potential impacts of the Project and accordingly identify suitable mitigation measures.

### 2.1. LACK OF SUFFICIENT DETAIL

The EIS submitted with SSI 16\_7485 for Stage 3 of the WestConnex M4-M5 Link Project identifies that the Project is based on a concept design (unlike the more detailed EIS' for Stage 1 & 2) and the Project will be subject to detailed design and construction planning to be undertaken by the successful contractors. There is not a sufficient level of detail or consideration of impacts provided in the EIS to clearly identify the Project, its potential impacts and benefits. While the EIS is lengthy, it lacks detail or interrogation of potential impacts and possible mitigation measures to address those impacts. The Project should not proceed until the key design issues are resolved and all of the potential impacts have been properly identified and addressed with appropriate mitigation measures nominated where required.

By way of comparison the EIS' for Stages 1 & 2 of WestConnex included detailed Design & Construct drawings submitted to the Department, this process should be repeated for Stage 3. There is no reason why the applicant is seeking to expedite the planning approval of Stage 3 of WestConnex without the required detail other than it would appear to facilitate certainty for the proposed sale of shares in Sydney Motorway Corporation (SMC), the company delivering WestConnex on behalf of RMS. The ability to sell an asset does not constitute justifiable planning grounds for granting an approval.

That the Project is subject to 'further refinement' gives no certainty that the end product will in any way resemble the indicative concept design put forth for the purposes of gaining an approval. It is unclear how the Minister for Planning is able to ensure that the delivery and construction of the Project resembles the indicative concept designs (in the absence of the proponent or successful contractor reapplying for a modified planning approval). There is no clarity or transparency as to how the Project can be approved based on a concept and no basis for compulsory acquisition of private properties without certainty when the actual shape and scale of the Project isn't established past an indicative concept design.

### 2.2. INCONSISTENCY WITH THE REQUIREMENTS OF THE SEARS

The EIS is inconsistent with many of the requirements of the revised SEARs issued by the Department for the Project dated 3 May 2017. The SEARs state that *"Irrelevant, conflicting or duplicated information must be avoided"*, the EIS includes conflicting information about the future of the Bays Precinct and other matters.

Section 115X of the EP&A Act enables a proponent to apply to the Minister to carry out State significant infrastructure. The application must describe the proposed infrastructure AND contain any other matter required by the Secretary. Section 115X requires the EIS submitted in support of SSI 16\_7485 to not only describe the Project but address the SEARs.

The submitted EIS does not satisfy section 115X of the EP&A Act. The SEARs require the EIS to present a level of assessment of likely impacts proportionate to the significance of, or degree of impact on, the issue, within the context of the Project location and the surrounding environment.

The EIS presents an assessment of a concept only and consequently is unable to adequately identify and assess the key issues as required by the SEARs.

### 2.3. LACK OF CONSISTENCY WITH BUSINESS CASE

The vehicle mix proposed in the EIS is significantly different to that which was originally proposed in the WestConnex Strategic Business Case released in 2015. Most notably there is now projected to be only 1/10<sup>th</sup> of the number of commercial vehicles expected to use the Project than was predicted in the Business Case. The core mission statement of WestConnex was linking Western Sydney with the Airport and Port Botany to improve freight connectivity. We question the validity of the cost benefit ratios (CBR) cited in the EIS of between 2.38:1 and 2.94:1 to support the argument that the Project will deliver a return on investment with the reduction in commercial traffic.



The CBR includes the Sydney Gateway Project in its assessment yet it is no longer part of the WestConnex staged program of works. It is not clear how it can be argued that the Project is a viable economic proposal based on a CBR that is reliant on other projects not approved or part of the subject Project to be built, in order to realise any return on investment.

There has been no CBR released specifically for the construction of just Phase 1 of the Project. It can reasonably be assumed that this is due to the fact that the difference between the CBR of the Project with only Phase 1 constructed, and with both Phase 1 & 2 constructed is such that Phase 2 is not commercially feasible. This in and of itself, is an indicator that other options to Phase 2 should be considered, including a redesign of Phase 1 and/or investing in mass public transport systems.

## 2.4. BAYS PRECINCT & URBAN RENEWAL

There are conflicting narratives within the EIS around the potential future use of remaining Project land within the Rozelle Civil surface works footprint (i.e. Rozelle Rail Yards). In March 2016, the Minister for Planning determined that the urban renewal of land within The Bays Precinct (including the Rozelle Rail Yards) was a matter of State planning significance and agreed to investigate the area as a State Significant Precinct in accordance with the *Bays Precinct Urban Transformation Plan (BPUTP)* for the urban renewal of land including a mix of housing, employment and active and passive recreational public space uses.

Some examples of these inconsistent narratives around the urban renewal of land within Project footprint include at page 3-14 *"The Project is inconsistent with the [Bays Precinct Transformation] Plan with respect to the development of the Rozelle Rail Yards for mixed housing and potentially also for employment uses... [due] to nature of the project and the geographical area required for its construction and operation and also the commitment made by the NSW Government (announced in July 2016) that the project would deliver up to 10 hectares of new open space and active transport links for the community."* But then at page 25-26 *"Roads and Maritime has been working with UrbanGrowth NSW to ensure their plans for The Bays Precinct have been considered in relation to the design of the Rozelle interchange."*

The EIS then identifies at page 7-38 (and in Appendix L & P) that UrbanGrowth NSW had identified *"a desire for contiguous land parcels that maximise usable remaining project land"* and that *"UrbanGrowth's preference is for the Rozelle interchange to be predominantly underground."* Also at page 12-32 the EIS states *"remaining project land would be subject to the provisions of a Residual Land Management Plan"*, and Appendix O page 224 *"work is currently underway to determine the specific desired future character for the Rozelle Rail Yards and broader Bays Precinct"* and finally at page 14-52 *"the project would deliver open space in the area, and not preclude further development in accordance with The Bays Transformation Plan"*.

The above conflicting narratives are in contrast with other statements in the EIS for example at Appendix O page 39 *"As planning for The Bays Precinct is not yet finalised, the Sydney Regional Environmental Plan 26 – City West (SREP 26) currently serves as a guide for the desired future character of the area providing high level planning principles for the precinct. This document represents the applicable statutory planning instrument for the area and will be superseded once the planning process for The Bays Precinct is finalised."* This statement identifies that the EIS ultimately has drawn its understanding of the desired future character of the Rozelle Rail Yards from SREP 26 as opposed to the BPUTP.

The revised SEARs issued by the Department state that *"Irrelevant, conflicting or duplicated information must be avoided"* (such as construction of the project and urban renewal of land). The EIS should be rejected until such time as this conflict is resolved, and the preparation of the EIS is consistent with the requirements as detailed in the SEARs.

Further, there is no clear pathway for how the Project, or its commitment of up to 10 hectares of public open space within the Rozelle Rail Yards Precinct will support the redevelopment of the Bays Precinct in line with the BPUTP. Rather the EIS demonstrates that the Project will serve to materially increase congestion around the Bays Precinct. Land that is to be designated as residual land – that is, no longer required for construction or operation of the M4-M5 Link or any other project associated with WestConnex should be identified now as part of the EIS so as to give certainty to future planning for the area and ensure local Councils and community groups can begin to develop plans for local open space and sporting and recreational fields, amongst other uses.

Further, it is still not clear how the Project reconciles its proposed role in facilitating urban renewal of land surrounding the project that will likely involve multi-storey buildings, when issues such as the ventilation stack heights which will serve to limit the redevelopment potential of surrounding land due to air quality impacts and risks to human health are still not clear. These issues could be addressed if the EIS were released in conjunction with or subsequent to the Project Design & Construction drawings being finalised.



The project should be refused until such a time as the proponent can decide on a consistent narrative and or finalise plans for the urban renewal of lands (or otherwise) within the Rozelle Rail Yards consistent with Government strategic planning for the Bays Precinct.

## **2.5. INCONSISTENCY WITH STATUTORY & STRATEGIC DIRECTIONS**

The project lacks consistency with the following statutory and strategic documents as identified below.

### **2.5.1. A Plan For Growing Sydney (2014)**

Despite the EIS stating that the overall program of WestConnex works (including the Project) has the potential to be a catalyst for major urban renewal, the Project is not consistent with Goal 2 of *A Plan For Growing Sydney* in that it calls for the acquisition of the Desane site and so removes the development potential of the site to deliver 200 dwellings in the Rozelle area that would enjoy high amenity. The site is to be acquired through the process of compulsory acquisition, yet the EIS does not identify that the property and those adjacent are required for ongoing operations or permanent infrastructure associated with the Project.

The Project is not consistent with Goal 3 of *A Plan For Growing Sydney* as it will destroy the development potential of sites identified for transformation under the BPUTP by reducing air quality for elevated receivers to such a level that any meaningful density within the Bays Precinct would not be achievable (discussed further at **Section 3.6**).

### **2.5.2. Draft Central District Plan**

One of the key priorities of the *Draft Central District Plan* (2016) was to increase the provision of housing across the District. The draft District Plan targets the delivery of an additional 5,500 homes by 2021 across the Inner West LGA and an additional 46,550 homes across the Central District. The draft District Plan also identifies opportunities for investment and growth, including development of The Bays Precinct, which the delivery of Phase 2 of the Project will jeopardise. The project is inconsistent with the *Draft Central District Plan* in that it will remove the development potential of the site to deliver 200 dwellings in the Rozelle area that would enjoy high amenity in close proximity to the CBD and transport.

### **2.5.3. SREP 26– City West**

While the Project in principle may be consistent with some of the planning principles associated with *SREP No. 26 – City West*, the effects of (unnecessary) compulsory acquisition of commercial and industrial properties for the Rozelle surface works such as light vehicle parking and to produce a passive open space area following completion of works conflicts with the following planning principles:

- Regional Role
- Land Use Activities
- Mixed Living and Working Environment

### **2.5.4. Bays Precinct Transformation Plan**

The EIS identifies that *'should the project not proceed, the Rozelle Rail Yards would likely be developed in accordance with the Bays Precinct Transformation Plan including the provision of public spaces, employment uses and mixed housing'* (page 3-14 and 12-65). This statement gives no certainty to either the delivery of the Project nor the provision of public spaces, employment uses and mixed housing for the area but for the public purpose creating even more confusion for stakeholders with an interest in the area.

While the Project is consistent with elements of the BPUTP's vision for the creation of new open space in the Rozelle Rail Yards, it is wholly inconsistent with the two primary aims for the Rozelle Rail Yards under the BPUTP being the provision of housing and employment uses. The EIS states in Appendix O page 39 *"As planning for The Bays Precinct is not yet finalised, the Sydney Regional Environmental Plan 26 – City West (SREP 26) currently serves as a guide for the desired future character of the area providing high level planning principles for the precinct. This document represents the applicable statutory planning instrument for the area and will be superseded once the planning process for The Bays Precinct is finalised."* The EIS ignores the vision of the BPUTP when it projects the future character of the Bays Precinct from SREP 26 rather than the BPUTP.

## **2.6. PROJECT JUSTIFICATION**

While it is correct to state that the M4-M5 Link Project is part of the NSW Government's commitment to deliver WestConnex for Sydney, it is disingenuous to say that Phase 2 of the Project (being the Rozelle Interchange)

is required to facilitate improved connections between Western Sydney and Sydney Airport and Port Botany. Phase 2 has been designed in order to provide a link to the future Western Harbour Tunnel and Beaches Link Project.

Desane is supportive of the delivery of Phase 1 to link the M4 East and New M5 as it is considered to be necessary in order to partially fulfil the original objective of linking Western Sydney and Sydney Airport and Port Botany, noting that Sydney Gateway (linking the St Peters Interchange to Sydney Airport and Port Botany) is no longer part of WestConnex. Phase 2 is not required to fulfil the original objective of linking Western Sydney and Sydney Airport and Port Botany.

Likewise, to say that WestConnex is an enabler of integrated transport and land use planning, and that it is supporting the development of initiatives including The Bays Precinct is not substantiated in the EIS. There has been no meaningful integration of transport and publicly discussed land use planning as part of the EIS. There is no demonstration that the Project is an enabler of these actions in the same way as other forms of fixed transport infrastructure such as heavy rail, metro rail and light rail are.

The location and design of the Rozelle Interchange appears to have been selected and designed in consideration of the objective to build the proposed future Western Harbour Tunnel. While this can be seen to be a logical decision that incorporates the integration of future projects into the proposed design of existing projects, the Western Harbour Tunnel and Beaches Link have no current funding or planning certainty.

The Western Harbour Tunnel and Beaches Link project is only in initial investigation stages and it is yet to be demonstrated that those projects are feasible or commercially viable; as such facilitating these projects should not be a justification for or basis of an approval of Phase 2 of the M4-M5 Link Project. This is also true for the justification that the Project will facilitate connectivity to the F6 Extension, which has even less project certainty than the Western Harbour Tunnel and Beaches Link project.

## 2.7. LACK OF STRATEGIC ALTERNATIVES

The merits of the Project were ostensibly considered in the context of a range of other alternatives based on the extent to which they could meet the project objectives. However, in the strategic alternatives assessment there was no assessment of the development of only Phase 1 of the M4-M5 Link. The EIS lacks the required detail to enable it to be able to be assessed by the Department, given that the assessment of strategic alternatives fails to consider a partial completion of the Project as an option.

A strategic alternatives assessment that incorporates only the development Phase 1 of the project should be undertaken.

## 2.8. POOR TRAFFIC MODELLING

The WestConnex Road Traffic Model (**WRTM**) version 2.3 that has been used is described at page ix as being *'a strategic traffic model that covers the Sydney metropolitan area and includes land use forecasts for current and planned development, including along Parramatta Road and around The Bays Precinct and Mascot town centre'*. However, there is no explanation of what forecast methodology has been used to project future development. Likewise, there is no definition of what is considered to be planned development for the purposes of the strategic traffic model. Reliability of the model and its results have not been demonstrated.

The traffic modelling scenarios appear flawed in that they do not assess long term scenarios beyond 2033 that would demonstrate project redundancy in terms of the ability to accommodate increased demand and impact on surface road network.

Likewise, they do not examine a scenario/alternative where only Phase 1 of the Project is built, or a model where only the Project is built and not the proposed future Western Harbour Tunnel and Beaches Link, Sydney Gateway and F6 extension. The traffic modelling did not factor in the impact that the construction and operation of the proposed future Sydney Metro West rail line would have on traffic demand (with stations located within or in the vicinity of the Project footprint).

The EIS states at page xix that *'the project would improve intersection performance, reduce travel times and increase average speeds across the Sydney metropolitan road network'*. There is no basis for this in the EIS and the statement is in direct conflict with the detail of the EIS that identifies that the Project will in fact do the opposite in the medium term and will not result in positive impacts on the road network until the entire network is completed.

The accuracy of the traffic modelling used is questionable, given that the traffic modelling used for the M4 was identified in the NSW Budget Estimates Committee meeting on Wednesday 6 September 2017 as being inaccurate.

The assertion that the Project is expected to have a positive impact on existing business amenity is not supported by economic modelling and is predicated on the assumption that the Western Harbour Tunnel, Beaches Link, Sydney Gateway and F6 Extension will **all** be built in the near to medium term.

The EIS identifies that there will be a 15% increase in traffic demand forecast in the 2023 AM peak 'with Project' scenario compared to the 'without Project' scenario around the Rozelle Interchange (Phase 2 of the M4-M5 Link). It also forecasts that the congestion on the Western Distributor and Anzac Bridge is forecast to cause queuing in the Iron Cove Link tunnel and the M4 exit ramp. The EIS identified that the Project will not relieve pressure on the road network and will instead only shift congestion closer to the Sydney CBD. This is not a good planning or transport outcome given the already high levels of congestion experienced on the Western Distributor and Anzac Bridge. While the EIS identifies that traffic volumes on the already constrained Anzac Bridge will increase as a result of the Project, it proposes no mitigation measures other than the delivery and operation of a future Western Harbour Tunnel and Northern Beaches Link within 15 years. However, there is no certainty of delivery of these projects.

The EIS also identified that many key intersections will experience a degradation in performance (as measured by Level of Service (**LoS**) levels) around the Rozelle Interchange as a result of the Project. This is in contrast to the 'without Project scenario' modelling that suggests that there would be no reduction of these key intersections performance at 2023. Further the average annual cost of crashes on four of the six roads modelled for the project around the Rozelle Interchange will increase as a result of the Project.

The land use forecast data used for the model has relied on out of date Census data from 2011, when the most recent and accurate Census data from 2016 was released by the ABS on 27 June 2017. The changes in demography between 2011 and 2016 in the locality and suburbs surrounding the Project are significant, as such the traffic modelling should be revised to use the most recent and accurate data.

The EIS identifies that if the Project was to proceed it will exacerbate traffic congestion. The Project should be modelled and integrated with other transport infrastructure projects to deliver positive outcomes for network performance.

## **2.9. LACK OF CONSTRUCTION TRAFFIC & ACCESS MANAGEMENT PLAN**

A Construction Traffic and Access Management Plan (**CTAMP**) should be part of the EIS for assessment so that there is transparency around the car parking strategy for construction staff. There is scope to reduce the 'required' 400 light vehicle car parks at Rozelle by having construction workers park at White Bay or Glebe Island which are Government owned lands – with workers bussed in to operations site. Given that construction workers operate on a shift based working model this would be an efficient method that would negate the requirement to compulsorily acquire private land for the sole purpose of the provision of 'light vehicle parking'.

The EIS identifies at page xix that *"the project may also result in alterations to parking availability and an increased demand for parking near project footprints and other work areas. This may affect the availability of parking for local residents, commuters, businesses and social infrastructure users, however impacts would be minimised through the development of a detailed construction car parking strategy as part of the CTAMP."*

When asked at Budget Estimates Committee meeting on Wednesday 6 September 2017 representatives of SMC, RMS and the Minister for WestConnex could not confirm that there would be no additional clearways implemented as a result of WestConnex which could have a further negative impact on the availability of parking for local residents, commuters, businesses and social infrastructure users. The Proponent is unable to commit to where and when clearways will be implemented, as such an assessment of the Projects cumulative impacts cannot be completed without establishing all the of the proposed changes.

There is over 30ha of disused Government owned land immediately proximate to the Rozelle Interchange construction facility at areas such as White Bay or Glebe Island that could be used for construction parking. This would likely reduce impacts on the local community regarding parking and would likely mitigate the need to acquire properties through compulsory acquisition for the sole purpose of light vehicle parking.

By locating the light vehicle parking within the Desane site with access along Lilyfield Road, the Project will add an additional 700 vehicle movements per day to Lilyfield Road, which already has a crash rate of 205.5 per 100MVKT compared to the Sydney Metropolitan average of 68.8 per 100MVKT, and the highest crash



cost per 100MVKT of roads surveyed for Stage 2 of the project. This is not an acceptable outcome for the community and local residents of Rozelle and Lilyfield that use Lilyfield Road.

The potential impacts of the Project cannot be identified until the EIS addresses the key issues as required to be addressed by the SEARs.

## 2.10. UNCERTAIN OPERATIONAL ROAD NETWORK REVIEW

The operational road network performance review should be provided as part of the EIS as it would likely demonstrate that the Project will result in improved road network performance within five years and suggested in the assertions made within the EIS. Further it should also include an assessment at ten years to understand longer term operational road impacts of the Project.

## 2.11. UNCERTAIN ENFORCEMENT MECHANISMS FOR HEAVY VEHICLE USAGE

The EIS fails to identify what will be done to ensure the shift of heavy vehicles from the surface road network to the tunnels, given that the EIS identifies that the toll for heavy vehicles will be approximately triple that of light vehicles. As such trucks will pay **\$16.80 (\$2017)** to use the M4-M5 Link and **\$25.80 (\$2017)** to use the whole WestConnex one-way. The Project's Business Case is built on the shift of heavy vehicles.

How will this shift be guaranteed when there is a significant cost associated with usage by heavy vehicles? We seek clarity as to what mechanism will be implemented in order to require heavy vehicles to use WestConnex as opposed to the surface road network. There should be oversight as to options such as whether the Government proposes to fine heavy vehicles for using the surface road network rather than using WestConnex. Similar to the strategy employed by NorthConnex at Pennant Hills Rd.

## 2.12. MISLEADING DISTANCE BASED TOLLING

The EIS statement that the funding of WestConnex assumes that a distance based tolling system will be implemented is a misnomer. The maximum toll for the use of the M4-M5 Link for light vehicles has been identified as being **\$6.50 (\$2017) for 7.5km**, while the toll for the entire WestConnex Motorway for light vehicles would be capped at a maximum amount of **\$8.60 (\$2017) for approximately 40km**. This equates to a cost of use across the entire WestConnex Motorway of **\$1 (\$2017) per 4.65km**, however for just the M4-M5 Link section the cost of use will be **\$1 (\$2017) per 1.53km**.

In simple terms, this means that people using only the M4-M5 Link will be charged **65% of the maximum toll to use 18.75% of the road**. This is not distance based tolling, and instead is using short trips closer to the Sydney CBD to subsidise longer trips across the WestConnex Project. If the toll was proportional then the toll to use the M4-M5 Link should be **\$1.60 (\$2017)**.

## 2.13. LACK OF COMPREHENSIVE CLIMATE CHANGE RISK ASSESSMENT

The climate change risk assessment undertaken for the Project considers the impact of future climate change, however it does not assess the impact that the Project will have on future climate change. The EIS fails to identify and assess all potential impacts of the Project.

## 2.14. INSUFFICIENT ASSESSMENT OF IMPACTS

There was no assessment in the EIS of the potential visual impact to residential receivers on Lilyfield Road between Victoria Road and Gordon Street, Rozelle. This is unacceptable given that they will directly abut one of the largest construction zones in the city for approximately the next four years. Likewise, their potential view loss was not assessed.

It is unacceptable that an assessment by the Proponent of the overshadowing from potential noise barriers has not been undertaken '*as no noise barriers are proposed as part of the concept design*' when the EIS identifies that they will be required to mitigate noise and light impacts to surrounding sensitive receivers during construction – including fixed night lighting for the duration of construction at tunnelling sites.

No assessment has been undertaken of the acoustic impacts or visual impacts of the ventilation stacks on surrounding development. The EIS is deficient and fails to assess all potential impacts.

## 2.15. INSUFFICIENT ASSESSMENT OF HUMAN HEALTH IMPACTS

Spatial changes in air quality as a result of the Project including the increase in pollutant concentrations on Victoria Road to the north of the Iron Cove Link and near Anzac Bridge as a result of the general increase in traffic due to population growth and the Project at that location has not been fully assessed in the EIS.

While the modelling of the changes in air quality for elevated receptors (such as apartment buildings) showed that there would not be a substantial impact on existing buildings (which are generally in the order of six storeys) from ventilation stacks, no assessment was undertaken on the impact for future buildings noting the expected development of high density residential development in the Rozelle area through the BPUTP (including Glebe Island, the Bays Market District and Rozelle Rail Yards).

The primary noise mitigation measure proposed during construction is to instruct individuals to stay indoors at affected properties with their doors and windows shut, and to minimise use of outdoor areas (page 11-39 of the EIS). This is not a reasonable mitigation measure for a Project with a four to five year construction program.

We question the legitimacy of the human health risk assessment (HHRA) included within the EIS on the grounds that much of the air dispersion, traffic, noise, and vibration modelling assumptions and the results upon which they are based are relate to a conceptual Project which is subject to detailed design. The HHRA seeks to quantify the potential risks and impacts of a Project that lacks clear definition. Any change in the Project will impact modelling. This is particularly the case for the traffic modelling and air dispersion modelling undertaken for the air quality impact assessment. Any deficiencies in the modelling, or change in predictions of air pollutant concentrations are likely to impact the HHRA, and will likely change the conclusions of the HHRA.

There is a lack of certainty in the Project definition and as a result a lack of clarity as to the potential risks the Project poses and availability of practical mitigation measures.

## 2.16. NO MEANINGFUL ASSESSMENT OF IMPACTS TO SYDNEY METRO WEST

The EIS states at page 3-5 that it has assessed its impacts on 'key rail projects... including Sydney Metro City and Southwest and the proposed Sydney Metro West. While the project has taken into account future metro lines in the design of the mainline tunnels and in the assessment of the potential cumulative impacts from possible concurrent construction activity' the EIS later states that as there is not sufficient information in the public domain relating to Sydney Metro West no assessment of impact on it has been undertaken. The proposed Rozelle Interchange, Western Harbour Tunnel stubs and Iron Cove Link tunnel have the potential to impact on the interim rail corridors identified by CBD Rail and CBD Metro which are to be protected in *State Environmental Planning Policy (Infrastructure) 2007*.

The EIS does not to address a potential impact on a key piece of transport infrastructure and the Project should not be permitted to inhibit the delivery of the future provision of the Sydney Metro West rail network.

## 2.17. NEGATIVE IMPACT ON EXISTING PUBLIC TRANSPORT

The EIS identifies (pages 3-16, 8-153) that the Project will have a negative impact on the travel times of buses to and from the Sydney CBD via Anzac Bridge and Victoria Road. This is already a route that experiences high levels of congestions and delays and the project will only serve to increase congestion and commute times for those travelling to and from the city via the Anzac Bridge.

## 2.18. FAILURE TO INTEGRATE CONSIDERATIONS OF FUTURE TRENDS IN TRANSPORT

The EIS correctly identifies (page 3-21) that in the last decade the number of train and bus trips grew faster than the rate of population growth, meaning that a greater percentage of the population is using public transport as opposed to car travel. The EIS also identifies the many future trends in transport including increased use of autonomous vehicles, reduction in personal car ownership and increasing use of car-sharing services. The question must be asked in this context is why are we building a road network that is not reflective of future demographic trends.

Urbis is not arguing that improved freight connectivity is not required in Sydney or that Sydney's road network is not in places heavily congested. Rather we are questioning whether the current proposal is the best solution

to Sydney's transport problems and future needs and whether the adverse impacts that will arise can be mitigated or are reasonable.

## 2.19. OPEN SPACE

One of the key benefits of the Project that has been consistently presented is the delivery of up to 10 hectares of new open space at the Rozelle Interchange which would provide an open space link between Bicentennial Park at Glebe and Easton Park at Rozelle. It has been consistently described as **up to** 10 hectares. This language leaves the door open for the project to provide much less open space than the identified 10 hectares and that the RMS will at some sell the 'redundant' or 'residual' land to the private sector for redevelopment at the end of the project construction to enable the development of high density infill residential.

We seek clarity around how this open space commitment will be delivered.



### 3. DESIGN AND PROJECT DEFICIENCIES

This section documents deficiencies identified in the review of the EIS, relating to issues with the indicative Project design, funding mechanism and poor project outcomes.

#### 3.1. POOR PLANNING, CONSTRUCTION DELIVERY & FUNDING MECHANISMS

The delivery mechanism for the design and construction of the M4-M5 Link (Stage 3) differs from the approach adopted for Stage 1 (M4 Motorway) and Stage 2 (M5 to St Peters extension) in that details of the design and construction presented in the EIS are indicative only, and based on a concept design that is subject to change through detailed design and construction planning that will be undertaken by the successful contractors post approval.

The delivery of the M4-M5 Link Project is reliant upon funding provided from the sale of shares in the SMC – the company delivering WestConnex. This results in project uncertainty as the design could change post-approval depending on input from the design and construct contractor, and also from the company who successfully tenders for the purchase of the 51% of shares in SMC to operate the tolling and infrastructure. It is likely that a private toll funder would seek to have input into the final design and construction plans of the tollway.

The sale of shares in SMC is not expected to be finalised until the middle of 2018. However, SSI 16\_7485 is expected to be determined prior to this. Any approval of the EIS should not be made until there is certainty around the future delivery and funding mechanisms of the corporation driving the Project is clarified by the New South Wales Government.

The Department should seek a greater level of detail and certainty before undertaking its assessment to be satisfied that the Project and its potential impacts have been properly identified, assessed, and mitigated where relevant.

It is unclear in the EIS how Project oversight and compliance can be achieved when the Project is wholly indicative. To that point, there is no clarity as to how the Department will ensure that it fulfils its role as being *'responsible for effective and sustainable planning'* (NSW DPE, Annual Report 2015-16) when assessing a proposal which explicitly is an indicative concept only that is not representative of the final outcome as stated in the EIS.

It is submitted that the application cannot be approved until such a time as detailed planning and design is undertaken to the same level of detail as the rest of the WestConnex Project and that which is required for any other project requiring assessment under Part 5.1 of the EP&A Act.

#### 3.2. FAILURE TO DELIVER PROJECT OBJECTIVES

The Project will not achieve its stated project objectives as outlined below:

- *Improving traffic conditions and reducing congestion on key arterial roads in proximity to the project* – The traffic modelling indicates that the opposite will happen, as discussed in **Section 2.8**.
- *Facilitating urban renewal in areas where the project would reduce traffic* – The Project will as a general rule will increase traffic flows, as discussed in **Section 2.8**.
- *Minimising impacts associated with acquisition of residential and commercial properties* – The Project relies on the compulsory acquisition of properties which is in conflict with the two above stated objectives as it will prevent the urban renewal of the land along Lilyfield Road and in the rest of the Bays Precinct, as discussed in **Section 3.8**.

#### 3.3. POOR PROJECT DESIGN

It appears that the Project has not been designed with sufficient capacity to accommodate future long-term demand. While the two mainline tunnels will accommodate four lanes in each direction once Phase 2 is operational; the tunnel linking the two mainline tunnels (referred to as the Inner West subsurface interchange) will be built to a width to accommodate only two lanes in each direction. While it is stated that there will be

potential to add a lane in each direction in this section (Inner West subsurface interchange), this will not be by widening the tunnel, instead this will be by narrowing the existing two lanes.

With narrower lanes visibility is reduced along with drivers' margin for error and ability to take evasive action to avoid accidents. As correctly identified in the EIS two lanes is not sufficient to meet demand. It appears that the design is deficient in that it will result in a bottleneck from Day 1 at the location of the Inner West subsurface interchange.

Given that this is a project that is envisaged to accommodate heavy vehicles, this narrowing of lanes is not an optimal design outcome. The design should be revised to allow for sufficient space in this section of the Project to mitigate avoidable future accident related injuries, fatalities and impacts to the wider road network's efficiency by increasing the carriageway width and number of lanes.

### 3.4. TRAFFIC GENERATION & INCREASED CONGESTION

The EIS states that *"the road network in the study area for the traffic and transport assessment currently functions under high levels of traffic demand, which often exceeds the operational capacity, especially city bound during the AM peak period. This includes some of the most highly congested road corridors in Sydney. Major routes in the study area, such as Parramatta Road, City West Link, Victoria Road, Anzac Bridge/Western Distributor, Southern Cross Drive, Princes Highway and King Street experience significant congestion, with resultant increases in travel time and variability, which can cause typical morning and evening peak hours to spread over longer periods"* (page 30-2). However, the project will not alleviate this demand along Victoria Road, Anzac Bridge and the Western Distributor in the AM peak and is projected to worsen traffic outcomes on these routes. Traffic is expected to increase on the Anzac Bridge and Western Distributor as a direct result of the Project and congestion will increase on these already heavily constrained routes.

The Project is only expected to reduce congestion if all other projects mentioned in the EIS are built, including Sydney Gateway, the Western Harbour Tunnel / Beaches Link and the F6 Extension. *"Where the project would connect to the existing road network, increased congestion is forecast in parts of Mascot, along Frederick Street at Haberfield, Victoria Road north of Iron Cove Bridge, Johnston Street at Annandale and on the Western Distributor [including Anzac Bridge]. A number of these areas are forecast to improve when the WestConnex program of works and the proposed future Western Harbour Tunnel and Beaches Link **are completed**"* (emphasis added).

The EIS earlier states, *"Reduced traffic is forecast on sections of major arterial roads including City West Link, Parramatta Road, Victoria Road, King Street, King Georges Road and Sydenham Road"* (page xi) if all proposed works are built. To justify a project based on reducing congestion with the caveat that this will only happen if other significant projects are completed that are yet to have funding allocated to them, planning certainty or political commitment does not represent an accurate assessment of the impacts of the Project.

While the EIS states that *"Together with the other components of the WestConnex program of works and the proposed future Sydney Gateway, the project would facilitate improved connections between western Sydney, Sydney Airport and Port Botany and south and south-western Sydney, as well as better connectivity between the important economic centres along Sydney's Global Economic Corridor and local communities"* (page 1-1) none of the proposals will tie into the existing tunnel network under the city and are reliant on the Anzac Bridge to connect with the Sydney Central Business District (CBD) which is already operating under strain. The proposal will increase congestion and traffic on Anzac Bridge; and will do nothing to alleviate this bottleneck and resultant increases to congestion on Anzac Bridge, Victoria Road and the Western Distributor.

Classic transport planning theory states that the more road space built the more vehicles will use it, often referred to as induced demand or latent demand.<sup>1</sup> Therefore, there won't be 100,000 less cars on the surface network, instead there will be an extra 100,000 cars across the network. The only thing that effectively reduces road network congestion is significant investment in public transport networks that transport people between key destinations.

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<sup>1</sup> Arnott, Richard. "The Economic Theory of Urban Traffic Congestion: A Microscopic Research Agenda". Boston College Working Papers in Economics 502, 2001.

Litman, Todd. "Generated Traffic and Induced Travel: Implications for Transport Planning". Victoria Transport Policy Institute, 2017.

The EIS lacks Project definition and doesn't clearly identify the potential impacts and mitigation measures of the Project. There appears no basis on which the Project can be approved at this time.

### **3.5. LACK OF SUFFICIENT CAPACITY TO FUTURE PROOF PROJECT**

The Project has been designed with built in bottlenecks, the most concerning of which is the tunnel linking the two mainline tunnels referred to as the Inner West subsurface interchange which will be built to a width to accommodate two lanes in each direction. There is no clarity as to how this design will sufficiently future proof the Project and provide a viable longer term solution to congestion. This will be the main route that freight from Western Sydney travelling to the Airport/Port Botany/South-west Sydney will use, as such this bottleneck will be problematic as the EIS identifies that two lanes are not sufficient to meet demand. Likewise, the mainline tunnels will operate as two lanes in each direction until (and if) Phase 2 (the Rozelle Interchange and Iron Cove Link) is constructed and is operational. The EIS identifies that two lanes are not sufficient to meet demand, the design of the Project should be revised to accommodate demand as identified in the EIS.

There has been no long-term forecasting (beyond 2033) of the level of servicing on the M4-M5 Link Motorway in order to demonstrate that it will continue to meet the freight transportation needs of Sydney.

### **3.6. POOR AIR QUALITY**

The tunnels have been designed to be equipped with ventilation systems that are designed to have zero portal emissions with all air being drawn in from the exit portals against the flow of traffic and expelled through an elevated ventilation outlet. While this is a positive for air quality immediately surrounding an exit portal, the Project decision to not filter the air being expelled from the ventilation stacks may result in adverse human health effects and inhibit future residential development in proximity to the ventilation stacks due to air quality concerns. This presents a conflict with the planned high density residential infill development proposed proximate to the locations of the ventilation stacks in order to accommodate the population growth of Sydney.

The EIS states that while *'the project ventilation system has been designed and would be operated so that it would achieve some of the most stringent standards in the world for in-tunnel air quality'* (page xiii) as the Proposal is an indicative concept design the realisation of this objective is not guaranteed.

The ventilation facility at the Rozelle Interchange will be located within the Rozelle Rail Yards and includes three outlets at one location at a height of around 35m above existing ground level. The EIS identifies that the exact location of the ventilation facilities will be determined during the detailed design of the project. The exact location of the ventilation facilities is a matter of public interest and planning importance and is a decision for which the community should have an ability to comment on and have oversight of prior to the determination of this application. It is acknowledged that the Project is identified as critical State significant infrastructure, this should not however result in a lack of project definition or assessment of potential impacts.

The EIS identifies at page xiv that *'planning controls would need to be developed in the vicinity of St Peters to ensure future developments at heights of 10 metres or higher are not adversely impacted by emissions from the ventilation outlets. Development of planning controls would need to be supported by detailed modelling addressing relevant pollutants and averaging periods'*. Given that the city will need to provide an additional 725,000 dwellings by 2036 to accommodate the projected population growth, this avoidable restriction on future densities is not a good planning outcome where a risk is imposed without mitigation and introduces future land use conflicts. The ventilation stacks should be required to be designed at all locations to not hinder/prohibit future development that is required to meet the needs of a growing city and designed with filters to minimise / remove potential risk to human health.

While the EIS does not specify this requirement for Rozelle it is assumed that had the EIS been written as a comprehensive document this issue would have been identified. The ventilation stacks at Rozelle have the potential to restrict any meaningful urban renewal of the Bays Precinct including White Bay, Glebe Island, the Bays Market District and the Rozelle Rail Yards to provide additional housing. This is an avoidable outcome, which could be ameliorated by requiring ventilation stacks to be filtered to remove harmful pollutants.

### **3.7. ONGOING OPERATIONAL NOISE**

The SEARs require that increases in noise emissions affecting nearby properties and other sensitive receivers during the operation of the Project are effectively managed to protect the amenity and well-being of the community. Ongoing operational noise as a result of the Project have been identified in the EIS as exceeding



the relevant criteria. The EIS fails to provide mitigation measures to address this and as such fails to address the requirements of the SEARs. It is not acceptable for this issue to be deferred to future 'detailed design' when the provision of noise mitigation measures could be subject to cost, when the noise generated is identified as exceeding relevant criteria and could have a negative impact on human health for surrounding sensitive receivers, notably local residents.

### 3.8. COMPULSORY ACQUISITION OF PROPERTY

There is very little information in the EIS on the intended use of the commercial land located along Lilyfield Road at Rozelle (including Desane's property at 68-72 Lilyfield Road, Rozelle) within the broader Rozelle civil and tunnel site, apart from a diagram which shows the Desane site as used for "light vehicle parking" during construction and later "landscaping" (subject to further detailed design) as shown in **Figure 2**. This is in direct contrast to the use of other sites such as Darley Road or Haberfield civil sites. There are alternative sites available for use as light vehicle parking as discussed previously in this submission which would avoid the 'need' to compulsorily acquire the property. The subject property is not impacted by or required for any permanent or operational infrastructure, and is not impacted by tunnelling with very minimal settlement and angular distortions projected as a result of the Project.

The property is the subject of a current Planning Proposal to amend the provisions of SREP 26 (PSA) as they apply to the subject property which was lodged with the Department on 5 June 2015. The PSA remains an active planning proposal as it has yet to be determined by the Department. The PSA would deliver an increase in housing close to Sydney's CBD, social infrastructure in the form of a child care centre to meet demands for such services in the Inner West and retail/commercial spaces on a site that is located in close proximity to existing and proposed public transport services both bus and rail. The PSA is not inconsistent with the construction and operational components of the Project, as supported by Survey advice obtained by Desane from *Structerre Surveying* dated 13 September 2017 (attached at **Appendix A**).

The Project's urban design concept for Rozelle Rail Yards will likely inform the future possible Urban Design Landscape Plan (UDLP) (reproduced at **Figure 3**). It should be noted that the concept plan denotes future use of the property as landscaping and attributes no specific use for the subject property. The development concept in the PSA is not in conflict with the location of operational infrastructure, or the provision of active transport infrastructure or sporting infrastructure. The PSA is a live proposal and given that SSI 16\_7485 is not approved and is still an indicative concept design only, the site remains appropriately designated for future urban development in accordance with its inclusion in the Bays Precinct.

The SEARs state under Socio-economic, Land Use and Property that "*passively landscaped areas should not be the default use for residual land*" (page 13). The concept in **Figure 3** is in direct conflict with the SEARs requirement as it shows acquired land along Lilyfield Road, Rozelle being used for passive landscape areas. This is not an efficient and economic use of the land and is contrary to the strategic planning for the locality that has been underway for several years for the area by both the Department and the individual land owners.

The EIS identifies that the impacts associated with property acquisition would be managed through a property acquisition support service. Given that the process of property acquisition began over a year ago for this project we seek clarity as to a) when will this service be established and b) what value will it serve if all the properties have been acquired prior to its establishment?

The EIS identifies that in order to facilitate the reconstruction of Victoria Road at Rozelle (between Robert Street and The Crescent) that adjacent land to the road reserve will be acquired for the project and the buildings demolished. The EIS however does not identify the extent of proposed works or land acquisition, it can be assumed that this will be the subject of detailed design.

The proposed acquisition of the subject property is in direct contradiction to the Project's objective of minimising the impacts associated with acquisition of residential and commercial properties on communities and it is unnecessary from a project delivery and operation perspective.



Figure 2 - Figure 6-21 Indicative Rozelle civil and tunnel site (C5) and Victoria Road civil site (C7) layout

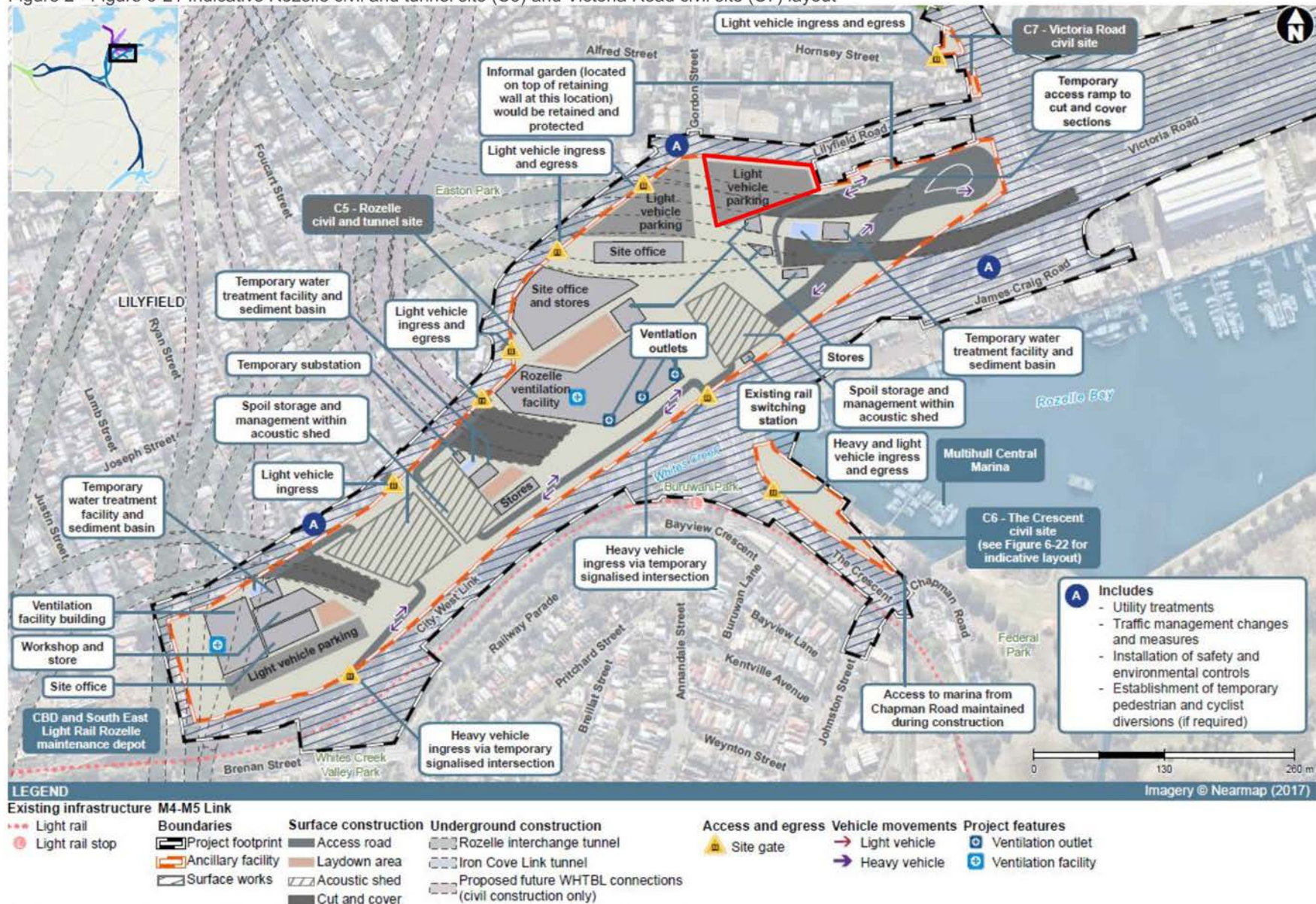




Figure 3 – Extract of Appendix L Figure 5.6: Rozelle Rail Yards concept plan (page 20)



Subject Property is outlined in red, note that it is identified for landscaping only and no specific use  
Source: WestConnex M4-M5 Link Environmental Impact Statement, Appendix L Figure 5.6, page 20



### 3.9. UNOFFICIAL VALUE CAPTURE

The EIS states at page 30-12 that *'the need to reduce impacts on property has been balanced with maximising opportunities for beneficial re-use of the areas required for construction that would be surplus to the operational needs of the project.'* This statement suggests that the acquisition process may be used as a vehicle by the RMS to recoup some of the infrastructure costs associated with the project. The High Court of Australia's judgment in *Mac's Pty Ltd v Parramatta City Council (2009) 165 LGERA 68* confirms that land being compulsorily acquired must be required for the public purpose and cannot be acquired for the purpose of resale.

The subject property is proposed to be used for parking of light vehicles during the construction phase, and nominated on one concept plan as passive open space.

The EIS states at page 5-59 that *'land required for construction but not required for operation that does not form part of the UDLP will be rehabilitated at the end of the construction period and made suitable for either return to the previous owner or lessee, or potential development for permissible uses under land use zoning provisions. Where this is the case, potential future development would be subject to separate development assessment and approval and the restrictions of the relevant consent authority. The project would not rezone or consolidate remaining project land and therefore there would be no changes to land use zoning for future development around the Rozelle surface works.'* While this statement appears to indicate that the land will not be rezoned, it only states that the Project will not rezone the land. This does not preclude the RMS or another party from continuing with the current Planning Proposals to rezone land or its transfer to UrbanGrowth NSW Development Corporation (established in October 2017) for its future on-selling at the conclusion of the project with a different zoning that will facilitate the vision of BPOTP.

The EIS identifies that land uses and zoning provisions within and in the vicinity of the Rozelle Rail Yards are anticipated to undergo substantial transformation over the coming decade under a number of infrastructure and urban renewal projects including the future development of The Bays Precinct in line with BPOTP. Consequently, it is unlikely that the Desane site would be used for passive open space.

While we are encouraged to see that there is potential for compulsorily acquired land to be *made suitable for ... return to the previous owner* however, there is no identified mechanism that identifies in what circumstances land will be returned, and in what circumstances land will be sold to third parties.

The EIS does not identify any operational purpose for the subject property beyond light vehicle parking, this would not prevent or preclude the current Planning Proposal from proceeding and the site being progressed over time as an infill mixed use development as proposed.

The UDLP referenced in the EIS should be part of the EIS to ensure that it is produced and that it is consistent with what the EIS proposes. The Proponent's decision to not provide an UDLP as part of the EIS, is denying the community the ability to comment on and the Department to assess the future landscape of their communities.

## 4. CONCLUSION

As stated, Desane does not object to the concept of WestConnex Stage 3, however concern and objection is raised to the lack of Project definition and the conceptual nature of the Project and the consequential lack of assessment for what is a significant infrastructure proposal.

The delivery mechanism of the M4-M5 Link (SSI 16\_7485) differs from the approach adopted for Stages 1 and 2 in that details of the design and construction approach presented in the EIS are indicative only, and based on a concept design that will be subject to change through detailed design and construction planning that will be undertaken by the successful contractors. The Project in its current form lacks sufficient detail in order to quantify the potential risks, impacts and mitigation measures and enable the application to be properly assessed by the Department.

The funding mechanism of the M4-M5 Link Project is reliant upon the sale of 51% of shares in SMC. This presents significant project and planning uncertainty in the event that the NSW Government is unable to realise the sale of those shares in the timetable that it requires.

The NSW Government recently announced that it would abandon the tender process for the procurement of a design and construct contractor due to "capacity issues." The delays in appointing a successful contractor will mean that the Department cannot know with any degree of certainty the extent to which either the contractor will want to change post-approval design and construction details – including input from the company who successfully tenders for the purchase of the majority stake in SMC.

The Project has not been designed with sufficient capacity to effectively meet latent demand at the first day of operation, and does not have the ability to expand the tunnels capacity to meet demand due to decisions made around tunnel widths. The width of both mainline tunnels and the Inner West Interchange tunnels should be revised in order to eliminate the current inbuilt Project redundancies and bottlenecks.

The Project concept which nominates the subject property and adjoining land as passive landscape open space in the Rozelle Rail Yards sub-precinct is inconsistent with the strategic planning and Project vision of the Bays Precinct which identifies much of this area as a future mixed-use precinct.

The Project land use concept is prejudicial to the effective urban renewal of the Bays Precinct and the EIS has not effectively analysed the impact that this will have on the State's ability to drive housing delivery in the Central District to meet the targets identified in the *Draft Central District Plan* (2016).

The assessment of strategic alternatives to the Project in the EIS did not assess the impacts of only delivering Phase 1 of the M4-M5 Link as opposed to both stages. This methodology has carried across most of the EIS including (but not limited to) the assessments of:

- Traffic generation and increased congestion;
- Climate change risk assessment;
- Impacts to human health;
- Air quality;
- View impact assessments; and
- Flawed Operational Road Network Review.

The consequences of using this methodology is that there has been no assessment of a realistic Project scenario where only Phase 1 is constructed. Consequently, the EIS fails to confirm that the best Project outcome is being delivered.

The assertion in the EIS that WestConnex will use a distance based tolling system is misleading. The current proposal means that people using only the M4-M5 Link will be charged **65% of the maximum toll to use 18.75% of the road**. This is not distance based tolling, and instead is using short trips closer to the Sydney CBD to subsidise longer trips across the whole Project. If the toll was proportional then the toll to use the M4-M5 Link should be **\$1.60 (\$2017) not \$6.50 (\$2017)**. Further there is no clarity as to how the Project proposes to enforce heavy vehicle usage of the tunnel system, given that they will pay triple the toll assigned to light vehicles. There should be clarity as to how heavy vehicles will be required to use the system as opposed to

the surface road network. This is an important consideration as the Business Case for the Project was the benefits to be delivered to the road network by removing heavy vehicle traffic from the surface roads.

The EIS has not demonstrated that the Project will not inhibit TfNSW's ability to develop the Sydney Metro West within the Interim Rail Corridor as identified in *State Environmental Planning Policy (Infrastructure) 2007*.

The EIS does not represent a robust assessment of the potential impacts of the Project, or appropriate mitigation measures. Until such a time as all environmental impacts, Project risks and mitigation measures of the Project are identified, it is submitted that the Department is not in a position to undertake a comprehensive assessment of the Project.



# DISCLAIMER

This report is dated 16 October 2017 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd's (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Desane Group Holdings Ltd (**Instructing Party**) for the purpose of lodging a formal objection to SSI 16\_7485 relating to WestConnex M4-M5 Link (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.







# **APPENDIX A      SURVEY ADVICE OBTAINED BY DESANE FROM STRUCTERRE SURVEYING DATED 13 SEPTEMBER 2017**

13<sup>th</sup> September 2017

**DESANE**  
PROPERTY PTY LIMITED

Unit 6 | 68-72 Lilyfield Road | Rozelle | NSW 2039

RE: Property 68-72 Lilyfield Road | Rozelle

Our Survey related goal was to create a 3D computer model of the proposed road Tunnel under the subject property based on the supplied information.

Selected Tunnel Exhibition diagrams and data were viewed and discussed below:-

- Figure 10 Geological long-section – M4 East to Anzac Bridge – Section 3 (see appendix)
- Figure A-5 Proposed Utility Services – Rozelle west ( see appendix )
- Feature & height survey of the subject Land by "Project Surveyors" ( see appendix )
- NSW State supplied Digital Cadastre Data Base ( DCDB approximate boundaries)
- NSW State supplied Digital Topographic data ( sourced as an alternate AHD check)

Please consider:-

1. There are three tunnels under the subject land
  - a. two are diverging from one tunnel directly below the centre of the subject land
    - i. Iron Cove link to Anzac Bridge tunnel
    - ii. M4 East to Anzac Bridge tunnel
  - b. one other tunnel crossing Gordon St Directly under the SW corner of the subject land
    - i. Anzac Bridge to M4 East tunnel
2. all these tunnels are directly under where our client propose to build a 13 storey (+ 3 level car park) building

A problem is that the supplied overview diagrams shows a depths to tunnel of (19m deduced at Gordon St); two issues with this are:-

- Gordon Street slopes from RL 6.5 AHD at Lilyfield Rd intersection to RL 2.5 off the SW corner of the subject land;
  - representing about a 4m fall in Gordon St above the tunnels
  - use RL 4m AHD as mean height in Gordon St over central tunnel
- Each overview diagram shows a long section for only one tunnel while the diagram views all show multiple tunnels.
  - This means that any Survey computer model we create will be in error by a significant amount and therefore we require more reliable information if we are to show how the tunnels will affect the subject land and present and future structures.
  - The referenced exhibition diagrams were probably built to promote overview discussion and are not designed for accurate dissection.

**Approximate Logical Statements based on the supplied information:-**

IF the 19m depth is from the average Gordon Street road Surface and seem to go down to the top of the land acquisition stratum "tunnel space" and NOT to the top of the actual tunnel.

IF all three tunnels are at the same depth and grade and the 19 m depth is below the Intersection of Lilyfield Rd:-

- The top of the tunnel space is about RL -15 AHD ( 4.0AHD - 19m)

IF the lowest point of the subject land is RL 2.5 AHD then the closest distance to the top of the tunnel space in Gordon Street is:-

- $2.5\text{AHD} - (-15\text{AHD}) = \text{about } 17\text{m}$

From the referenced diagrammatic Geological long-section the tunnels are depicted as one tunnel and are shown to be graded under Gordon St:-

- The grade appears to be about 6m per 100m and rising west to east

The closest point in height on the eastern boundary can be estimated:-

- $-15\text{AHD} + 6 = \text{about RL } -9 \text{ AHD}$  of top of Tunnel space crossing the eastern boundary of the subject land
- From the referenced Survey plan about RL 3 AHD is the ground level near the SE corner of the subject land
- Critical Tunnel land space cover based on existing situation =  $-9\text{AHD} - (+3\text{AHD}) =$  approximately 12m clear of top of tunnel space crossing the eastern boundary of the subject land

A similar calculation can be made from the proposed Architectus Plans using the stated proposed upper Ground Floor height of 12.76AHD (see Architectus Section in appendix ) as follows:-

- Critical Tunnel land space cover based on future carpark structures (Architectus) =  $12.76\text{AHD} - (3.1\text{m(LG)} + 3.1\text{m(B1)}) = \text{approximate RL } 6.56\text{AHD}$  Under Basement 1
- $-9\text{AHD} - (+6.56\text{AHD}) =$  Future structure is approximate 15m clear of top of tunnel space crossing the eastern boundary of the subject land



## Conclusion

Based on approximate information, the Critical Tunnel stratum land space cover clear of the top of the tunnel space crossing the eastern boundary of the subject land is:-

- based on existing structure is approximately 12m
- Future structure is approximate 15m

From a Survey perspective a reliable 3D model of the proposed underground tunnels cannot be constructed based on the approximate "exhibition type" project overview diagrams which have been supplied for investigation.

To proceed in this matter to show an accurate computer representation of the tunnel impact upon the subject land we will require the following information:-

- Tunnel acquisition space stratum plans in MGA and AHD
- Engineering plans of tunnel(S) construction in MGA and AHD

Yours faithfully

A handwritten signature in black ink, appearing to read 'Garry Keats', with a long horizontal flourish extending to the left.

Garry Keats | Senior Registered Land Surveyor

B.App.Sc(Distn), M.Surv.Sc

## Appendix

- Figure 10 Geological long-section – M4 East to Anzac Bridge – Section 3
- Figure A-5 Proposed Utility Services – Rozelle west
- Feature & height survey of the subject Land by “Project Surveyors”
- future carpark structures (Architectus section plan)

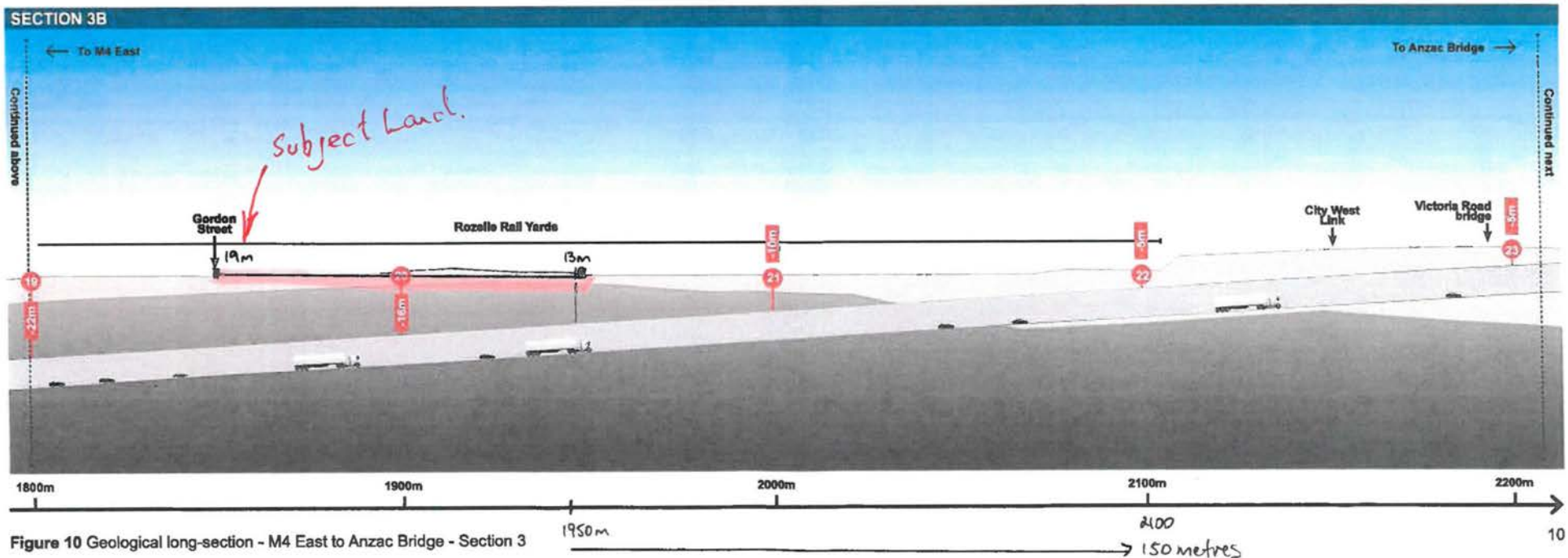
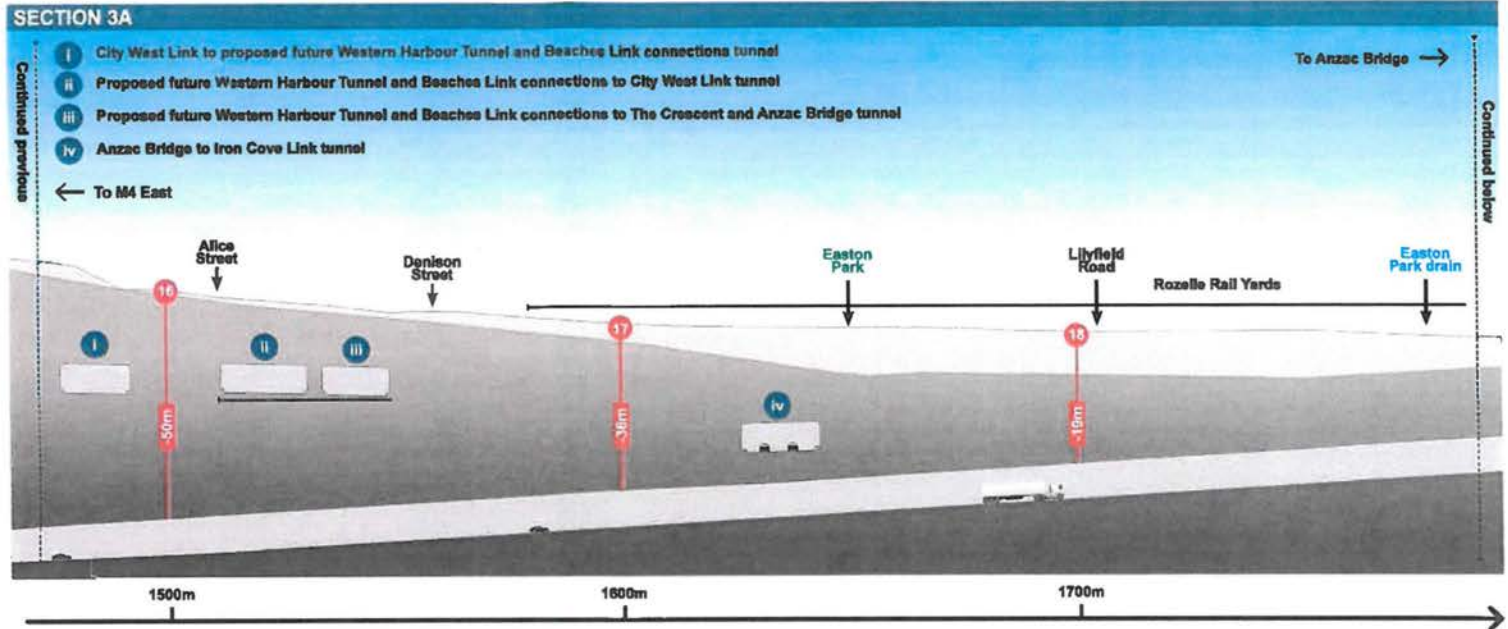


Figure 10 Geological long-section - M4 East to Anzac Bridge - Section 3



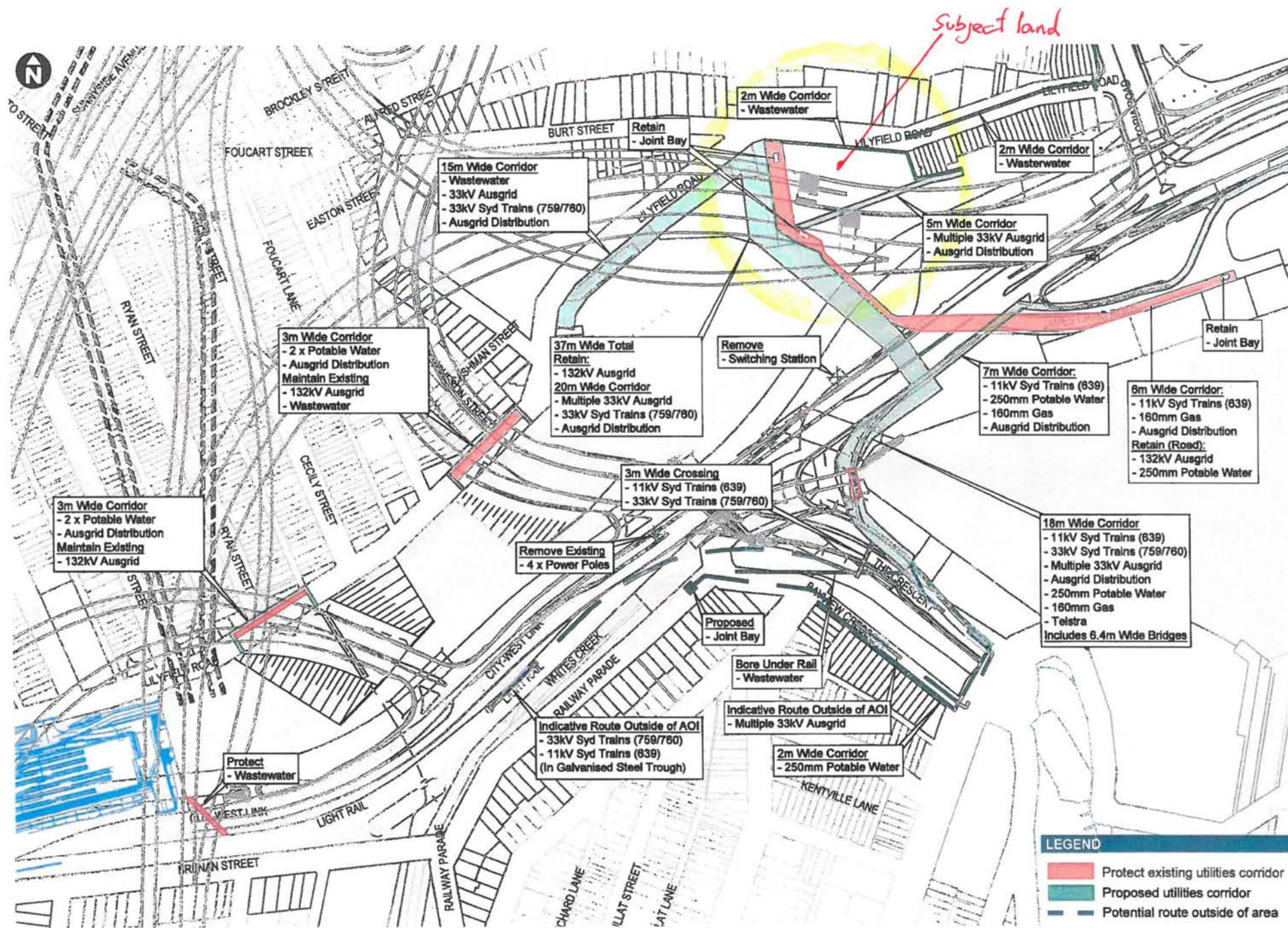
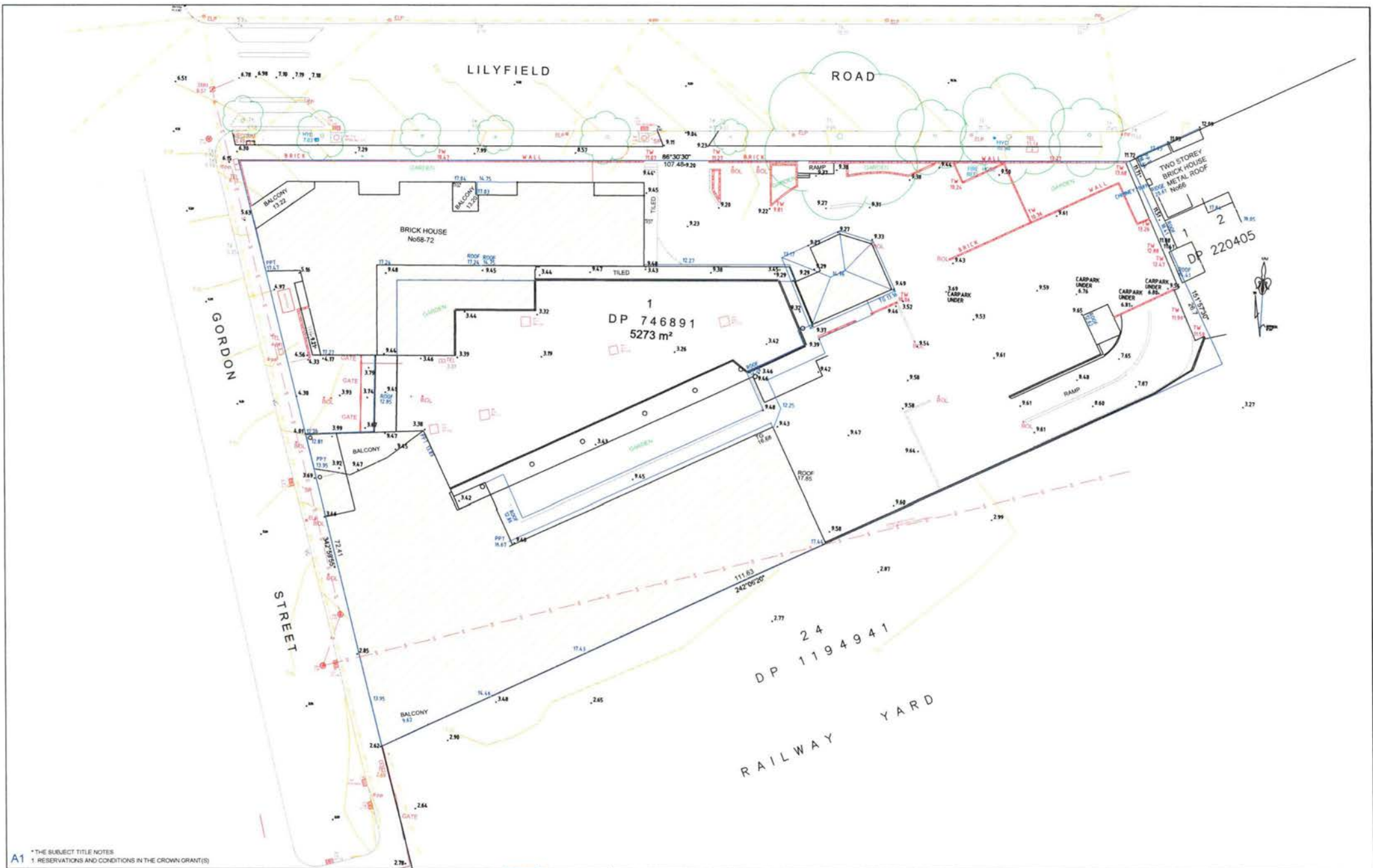


Figure A-5 Proposed utility services - Rozelle west





A1 \* THE SUBJECT TITLE NOTES  
1. RESERVATIONS AND CONDITIONS IN THE CROWN GRANT(S)

**NOTES :**

- BOUNDARIES HAVE NOT BEEN DEFINED BY SURVEY AND ARE DIAGRAMMATIC ONLY.
- LAND DIMENSIONS AND AREAS HAVE BEEN COMPILED FROM PLANS OBTAINED FROM LPLMA.
- BEARINGS RELATE TO MM NORTH ORIGINATING FROM DP 746891
- LEVEL DATUM IS AND ORIGINATING FROM SSM 25305 RL 6.857
- VISIBLE ACCESSIBLE SERVICES ONLY HAVE BEEN LOCATED. THIS PLAN DOES NOT PURPORT TO SHOW UNDERGROUND SERVICES
- THE EXISTENCE OF UNDERGROUND SERVICES HAS NOT BEEN ESTABLISHED
- EXISTENCE OF SERVICES MUST BE VERIFIED BY CONTACTING DIAL BEFORE YOU DIG (DBYD) 1100 COM AU
- CRITICAL SERVICES MUST BE EXPOSED AND LOCATED
- NEIGHBOURING HOUSES' WINDOWS AND ROOF POSITIONS ARE APPROXIMATE ONLY
- FLOOR LEVELS GENERALLY SURVEYED AT DOOR THRESHOLDS. INTERNAL ROOMS NOT SURVEYED
- CONTOURS SHOWN ARE INDICATIVE OF LAND FORM. SPOT LEVELS SHOULD TAKE PRECEDENCE
- REFER TO FACE OF PLAN FOR SUBJECT TITLE NOTATIONS
- THIS TITLEBLOCK IS AN INTEGRAL PART OF THIS DRAWING AND SHOULD NOT BE REMOVED

#### LEGEND

ELP - ELECTRIC LIGHT POLE  
HYD - HYDRANT  
TW - TOP WALL  
TK - TOP KERB  
TO - TOP CUTTER  
PP - POWER POLE  
SMH - SEWER MANHOLE  
SP - SIGN POST  
SV - STOP VALVE  
TEL - TELSTRA PIT  
VC - VEHICLE CROSSING  
VM - WATER METER  
BOL - BOLLARD  
INV - INVERT



Liability Limited by a  
Scheme Approved under  
Professional Standards  
Legislation

PROJECT SURVEYORS 2017  
REPRODUCTION WITHOUT WRITTEN  
APPROVAL IS STRICTLY PROHIBITED

REV	AMENDMENTS	DATE
A	CONTOURS ADDED	31/03/17

CLIENT: DESANE  
PLAN OF: 68-72 LILYFIELD ROAD  
ROZELLE  
BEING: LOT 1 IN DP 746891  
SHOWING: GENERAL DETAIL AND  
SITE LEVELS  
PURPOSE: ARCHITECTURAL DESIGN  
COUNCIL SUBMISSION  
SHEET 1 OF 1

SCALE 1:200

0	5	10	15	20
---	---	----	----	----

SURVEYOR : EK  
DATUM : AUSTRALIAN HEIGHT DATUM  
ORIGIN : SSM 25305 RL 6.857  
JOB REF : B3755  
DRAWING No. B3755-1  
CHECKED : SD  
DATE OF SURVEY: 28.03.2017  
REDUCTION RATIO : 1:200

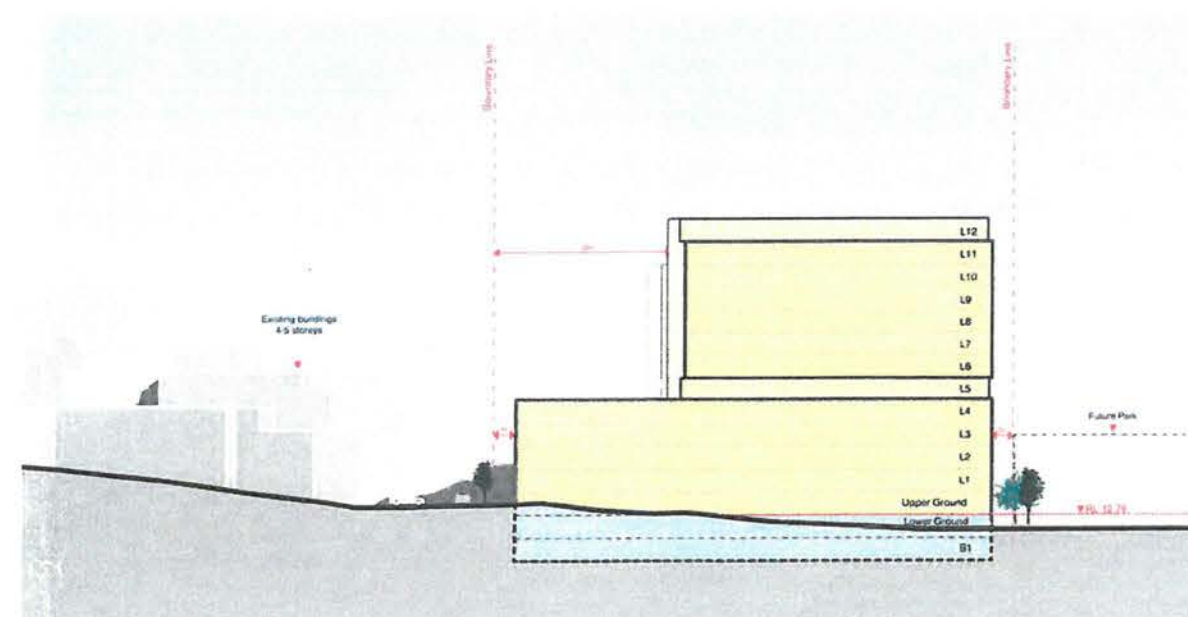
**BELLA VISTA**  
PO Box 7419  
BAULKHAM HILLS NSW 2153  
SUITE 405, LEVEL 4  
14 LEXINGTON DRIVE  
BELLA VISTA NSW 2153  
PHONE : 9056 1900  
email: office@projectsurveyors.com.au  
www.projectsurveyors.com.au  
ABN 20 098 422 014



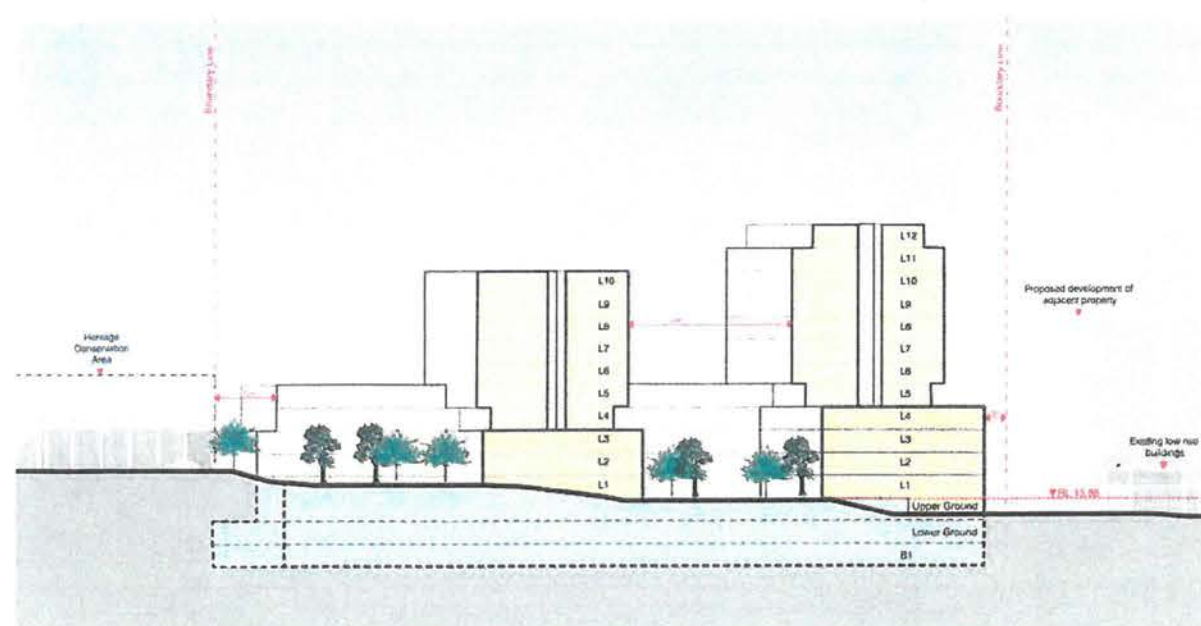
## Sections

The ground level varies approximately 2-3 storeys across the site, creating a complex relationship with the ground plane, which has been considered through this design.

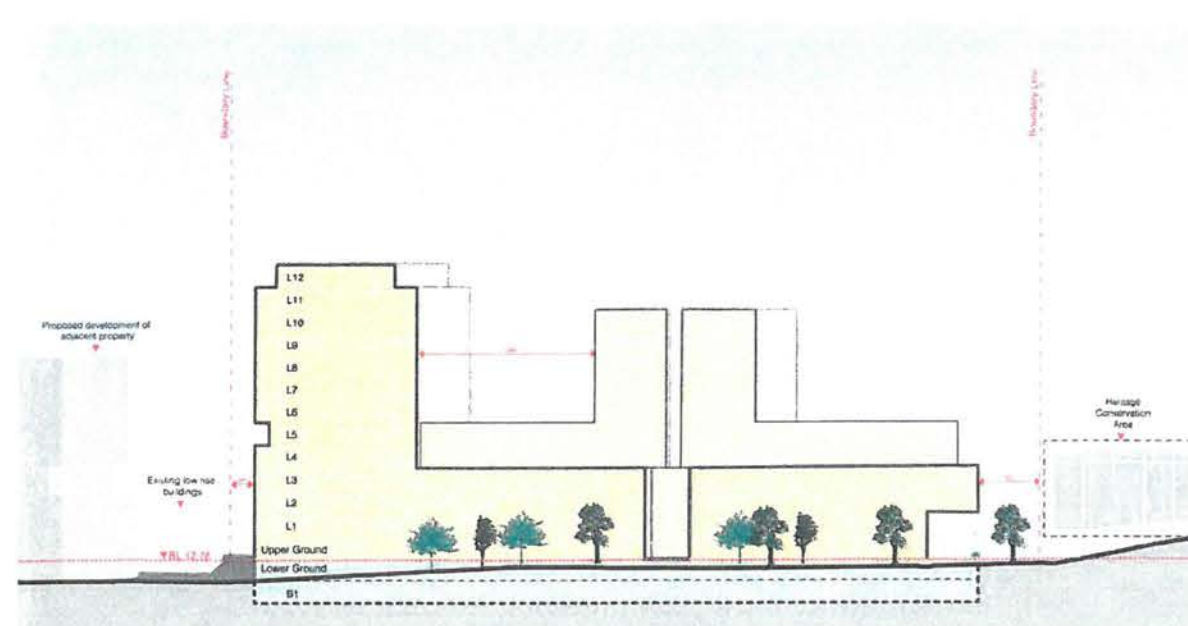
The design provides a sensitive height and scale relationship to neighbours at a local-scale, with taller buildings significantly set back from these.



West - Burt Street



North - Lilyfield Road



South - future park







### **BRISBANE**

Level 7, 123 Albert Street  
Brisbane QLD 4000  
Australia  
T +61 7 3007 3800

### **GOLD COAST**

45 Nerang Street,  
Southport QLD 4215  
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T +61 7 5600 4900

### **MELBOURNE**

Level 12, 120 Collins Street  
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Australia  
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Level 14, The Quadrant  
1 William Street  
Perth WA 6000  
Australia  
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### **SYDNEY**

Tower 2, Level 23, Darling Park  
201 Sussex Street  
Sydney NSW 2000  
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### **CISTRI – SINGAPORE**

*An Urbis Australia company*  
#12 Marina View  
21 Asia Square, Tower 2  
Singapore 018961  
T +65 6653 3424  
W [cistri.com](http://cistri.com)

**From:** [REDACTED]  
**Sent:** Mon, 16 Oct 2017 06:09:19 +0000  
**To:** [REDACTED]  
**Subject:** FW: Submission Details for Richard Humphreys-Roberts (object)

**From:** system@accelo.com On Behalf Of Richard Humphreys-Roberts  
**Sent:** Monday, 16 October 2017 5:09:04 PM (UTC+10:00) Canberra, Melbourne, Sydney  
**To:** [REDACTED]  
**Subject:** Submission Details for Richard Humphreys-Roberts (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Richard Humphreys-Roberts  
[REDACTED]

Address:  
[REDACTED]

Birchgrove, NSW  
2041

Content:

This is crazy - there just isn't enough space for all these vehicles to arrive in that space....

[REDACTED]  
Submission: Online Submission from Richard Humphreys-Roberts (object)  
[https://majorprojects.accelo.com/?action=view\\_activity&id=228232](https://majorprojects.accelo.com/?action=view_activity&id=228232)

Submission for Job: #7485 WestConnex M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)



**From:** [REDACTED]  
**Sent:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** FW: Submission Details

**From:** system@accelo.com On Behalf Of [REDACTED]  
**Sent:** Monday, 16 October 2017 5:14:04 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: Mr (2041)

Email: [REDACTED]

Address:

[REDACTED]

[REDACTED]

Content:

Unfiltered smoke stacks so low that plumes will strike homes!! Charge motorists the extra 5c per trip to filter the stacks. Its common sense. A policy of no filtration is madness when you want to have 3 smoke stacks right next to each other in Rozelle.

Stacks in Rozelle rail yards where they have height and plume escape velocity constraints due to aircraft flight path. Could there be a worse location for smoke stacks?

I do not support this project. The community consultation has been misleading and deceptive.

There needs to be a shock advertising campaign to raise political awareness of the deaths and health impacts from vehicle / truck pollution.

This is such a wasted opportunity to actively reduce pollution.

Any approval should include filtration of stacks or restrictions on high emission vehicles in tunnels.

IP Address: - [REDACTED]

Submission: Online Submission from [REDACTED] of Mr (object)

[https://majorprojects.accelo.com/?action=view\\_activity&id=228236](https://majorprojects.accelo.com/?action=view_activity&id=228236)

Submission for Job: #7485 WestConnex M4-M5 Link

[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link

[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)

**From:** [REDACTED]  
**Sent:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** FW: Submission Details

**From:** system@acelo.com On Behalf Of [REDACTED]  
**Sent:** Monday, 16 October 2017 5:25:01 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:

Application Number SSI 16\_7485

It seems clear to me as a Sydney resident that there is a huge amount of opposition to aspects of the proposal both at public and local government level. My greatest concern is the public perception that information and assumptions made in determining the course of action under consideration have not been independently verified, that alternatives to the scheme have not been considered, and that there is an attitude within state government of wanting to the project implemented for its own sake.

Clearly, were this the case, it would not be in the public's interest. In my view the government has a duty to act, and be seen to be acting, in the public's interest.

Specific aspects of the plan, such as the location of unfiltered smoke stacks close to a school, or in fact anywhere in Sydney, seem poorly thought out and indicate a lack of oversight by NSW government. The corporations involved will look out for the bottom-line profit; I believe it is your role to ensure that the public are protected, particularly when it comes to the health and education outcomes for our young people. Please could the parties involved explain why technology can't be utilised to mitigate this threat to the community?

As Australians we should pride ourselves on being at the forefront of using technology to solve our problems, and not let uninspired design spoil our environment. Within the scope and scale of this project it must be possible to protect our environment by filtering pollution and restoring green space around busy roads and ventilation shafts; please consider this.

As a former industrial area, Rozelle's soils contain lead and toxic pollutants that will be released into the air and water; please consider how this can be mitigated..



The environmental impact and use of technology to address these issues seems to be an opportunity that has gone wasted and unaddressed in the proposal.

In addition, there are other areas where technology could be used to improve public transport outcomes or increase traffic density without causing congestion. Many of these technologies, such as time-of-day speed limit changes and park-and-ride schemes, have already been used with success in other countries such as the UK. Autonomous vehicles are perhaps 10 or 20 years away, well within the lifetime of the Westconnex proposal, and will likely allow for much greater traffic density whilst ensuring current (or better than current) travel times.

This kind of technology will render whole parts of the project redundant and unprofitable within a relatively short timeframe, yet I have not seen enough analysis of this sort of technological disruption in the materials provided to the public.

If the kind of money that has been set aside for this project could be used to drive innovation in our public transport system, it could go some way to achieving the same or better outcomes than those sought by the Westconnex project. Yet this has not been adequately considered in the proposal, and it should have been.

Attention must also be paid to protecting and enhancing the utility of our communities, rather than dividing them, by ensuring the creation of green spaces, and access for pedestrians over, under or through any roads that pass through our urban areas. This will be a particular issue around Darling Street.

I also request that consideration be given to physical and mental health outcomes for people living, working and learning close to long-term construction sites, by minimising construction noise, and assisting with noise mitigation infrastructure both at the site and in the home, workplace and school. This will be much better outcome than leaving these people to face alone the problems that the government will have created by pursuing this project.

My request is for NSW Planning to halt the current process and call for an independent review to consider all available options, and not only proceed with the best proposal for Sydney and its inhabitants, but also explain clearly to the public why this is the best option.

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.' Please do not allow developers to operate without oversight and make choices and decisions in the interest of profit rather than the community, by holding them to their designs and plans, and by not giving them such a dangerous degree of latitude.

I urge the Secretary of NSW Planning to advise the Minister to reject this EIS until the concerns of the community can be adequately addressed.

IP Address: [REDACTED]

Submission: Online Submission from [REDACTED] (object)

[https://majorprojects.accelo.com/?action=view\\_activity&id=228244](https://majorprojects.accelo.com/?action=view_activity&id=228244)

Submission for Job: #7485 WestConnex M4-M5 Link

[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link

[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)

**From:** [REDACTED]  
**Sent:** Mon, 16 Oct 2017 06:36:52 +0000  
**To:** [REDACTED]  
**Subject:** FW: Submission Details for David Murrant (comments)  
**Attachments:** 228246\_Westconnex M4-M5 Submission SSI 7485\_  
Murrant\_2017Oct16\_1726.pdf

**From:** system@accelo.com On Behalf Of David Murrant  
**Sent:** Monday, 16 October 2017 5:27:08 PM (UTC+10:00) Canberra, Melbourne, Sydney  
**To:** [REDACTED]  
**Subject:** Submission Details for David Murrant (comments)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: David Murrant  
[REDACTED]

Address:  
[REDACTED]

Rozelle, NSW  
2039

Content:  
Please refer to the attached document.

[REDACTED]  
Submission: Online Submission from David Murrant (comments)  
[https://majorprojects.accelo.com/?action=view\\_activity&id=228246](https://majorprojects.accelo.com/?action=view_activity&id=228246)

Submission for Job: #7485 WestConnex M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)

16 October 2017

Mr David Murrant  
22 Lilyfield Road  
ROZELLE NSW 2039

Ph: 0409 552 515  
david.murrant@jamesrose.com.au

NSW Planning & Environment  
GPO Box 39  
SYDNEY NSW 2001

**Re: M4 – M5 LINK WESTCONNEX  
APPLICATION No. SSI 7485**

Dear Sir/Madam,

I am writing to you to express my concerns regarding the proposed Rozelle Interchange works as part of the M4 – M5 Link of Westconnex. My concerns are outlined below:

**Traffic Noise Impact - Operational:** Specific reference is made to the proposed road network within the disused rail yards behind the residences on Lilyfield Road between Gordon Street and Victoria Road. The existing area has deteriorated significantly since we moved to the area 17 years ago due to poor planning and engineering of the area. The following issues have led to increased traffic noise;

- a. In 2002-2003 (approx.) the then Sydney Ports Corporation demolished an existing shed which was approximately 12m high and 80m long. The old shed was located directly adjacent to the existing City West Link bypass which goes under Victoria Road. The shed served as a very effective noise barrier to residences on the southern side of Lilyfield Road. No noise mitigation measures were put in place by Sydney Ports Corporation following the demolition. Noise levels rose significantly following this work.
- b. The existing City West Link bypass under Victoria Road has very poor acoustic characteristics and is a know area for people with high octane vehicles who drop the clutch as they go through the tunnel due to the sound it generates. The amplified noise is then reflected off the adjacent vertical concrete walls toward the Lilyfield Road residents, which was previously mitigated by the old shed.
- c. Glebe Island port operations require trucks that come off the ANZAC bridge to complete a 180 degree turn down a steep grade to enter James Craig Road. The truck maneuver is difficult for semi-trailers and frequent use of air brakes leading up to the hair pin curve is heard, particularly during bulk ship operations. Sydney Ports



Corporation/Port Authority of NSW have approved increased truck numbers and hours of operation over the past 10-15 years purely for the Port's benefit without adequate environmental consideration of the increased noise pollution. Similarly, trucks exiting the port facility from James Craig Road are required to accelerate out of the port precinct and through the City West Link bypass under Victoria Road which amplifies the noise of the accelerating trucks.

As noted above, the noise pollution at this area has deteriorated due to poor planning and poor engineering by a government department only focused on their business and not the impact on the surrounding community. Part 5 Approvals under the EP&A Act used to by-pass adequate planning control and environmental impact mitigation. The proposed works as Part of the M4 – M5 Link is an opportunity to improve the existing environment and not simply rely on 'minimum impact' targets. The noise creep needs to stop.

The current EIS plans are unclear in this area and some parts of the EIS provides conflicting information. Figure 5-27 – Map 3 shows the Iron Cove Bridge/M4 East to ANZAC Bridge connection being an open surface road yet Figure 5-21 Indicative cross-section shows this section being covered and also the existing City West Link bypass under Victoria Road being enclosed. From an engineering perspective both these sections can be enclosed up to Victoria Road with the portals located on the eastern side of Victoria Road where there are no residents directly adjacent to the portals. This solution will go a long way to mitigating 15+ years of poor designs.

Any consent for this stage of Westconnex should include the following conditions of consent:

1. All new and existing roads below Victoria Road including the City West Link bypass to ANZAC Bridge and the Iron Cove Bridge/M4 East to ANZAC Bridge connection shall be covered up to the western side of Victoria Road with portals located on the eastern side of Victoria Road. Enclosing the existing City West Link bypass to ANZAC Bridge under Victoria Road should continue west to the James Craig Road intersection.
2. Noise mitigation of existing surface roads shall be installed, at the source, with noise barriers adjacent to the elevated City West Link.
3. Target noise levels at residences on Lilyfield Road shall be a reduction on current measured levels.

Make the goals for the project to be an improvement to the environment, not just adding to past mistakes and mis-management.

Yours sincerely,

David Murrant

**From:** [REDACTED]  
**Sent:** Mon, 16 Oct 2017 06:38:09 +0000  
**To:** [REDACTED]  
**Subject:** FW: Submission Details for Merinda Timpany (object)  
**Attachments:** 228143\_20171016142713302\_2017Oct16\_1533.pdf

**From:** system@acelo.com On Behalf Of Merinda Timpany  
**Sent:** Monday, 16 October 2017 3:34:11 PM (UTC+10:00) Canberra, Melbourne, Sydney  
**To:** [REDACTED]  
**Subject:** Submission Details for Merinda Timpany (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Merinda Timpany  
[REDACTED]

Address:  
[REDACTED]

Haberfield, NSW  
2045

Content:

I object to the proposal, and I particularly object to the Option B for Haberfield/Ashfield. My submission is further detailed in my attached letter.

[REDACTED]  
Submission: Online Submission from Merinda Timpany (object)  
[https://majorprojects.acelo.com/?action=view\\_activity&id=228143](https://majorprojects.acelo.com/?action=view_activity&id=228143)

Submission for Job: #7485 WestConnex M4-M5 Link  
[https://majorprojects.acelo.com/?action=view\\_job&id=7485](https://majorprojects.acelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link  
[https://majorprojects.acelo.com/?action=view\\_site&id=3247](https://majorprojects.acelo.com/?action=view_site&id=3247)

Merinda Timpany  
22 Dalhousie St  
Haberfield, NSW 2145  
Ph 0411795386  
merinda\_mike@yahoo.co.uk

## TO WHOM IT MAY CONCERN

I make the following submission to the Environmental Impact Statement (EIS) exhibition for the Westconnex M4-M5 Link Project (**Project**) (SSI 16\_7485):

I object to the Project outlined in the Environmental Impact Statement in its entirety due to the effects on the Haberfield/Ashfield/Five Dock communities. I object to all ongoing work in Haberfield and Ashfield beyond the M4 East project. I further and particularly object to the specific plans proposed in the EIS and most particularly to proposed Option B and its effect on children attending Haberfield Public School (**HPS**).

The plans will cause significant detrimental effects on our children's health, safety and learning environment. It will also further detrimentally effect our community.

I request the Department of Planning not approve the EIS in its current form.

### **Objection to the project as a whole continuing to impact Haberfield/Ashfield**

The Haberfield community has already suffered serious consequences as a result of the M4 East stage of WestConnex.

- Several friends' homes were acquired and demolished to make way for the massive eight-lane roads that has physically and emotionally split our community and caused damage to community cohesion.
- Many of our friends live near the construction sites (including at Wattle St/Walker Ave, Northcote St, and along Parramatta Road) and suffer daily from unacceptable levels of noise, dust, traffic and parking congestion caused by WestConnex development and associated utilities work.
- I am concerned about my children walking to school and other local amenities due to the increased traffic on the local streets.
- Many of our local back street routes have been blocked off during construction causing long standing diversions, often requiring us to travel on busier arterial roads like Parramatta Rd.

I strongly believe the M4-M5 Link stage, as proposed, will exacerbate these adverse impacts on our community. It also poses a threat to our children's education. My youngest child cannot remember life without the construction and if the Project goes ahead as suggested her entire primary school education will be affected by disruptive WestConnex works.

I have discussed the latest EIS with other parents and members of our community and it is clear that most feel entirely disempowered by the process. We objected to the M4 East and believe our concerns were ignored. We are distressed by the proposals and feel powerless



to impact them. We feel very stressed by the fact that we feel unable to stop the significant adverse effects, particularly on our children.

I was until very recently unaware that the M4/M5 link would in any way impact Haberfield. I understood that after the M4 East the work would move out of Haberfield to effect other communities instead. It never occurred to me that the effects of the M4/M5 link would be even more catastrophic for the school than the M4 East Project.

This submission is divided into two parts – My objections to Option B and my objections to the plans outlined in the EIS in general.

### **Objections to Option B**

I strongly oppose Option B, the choice of two construction plans that significantly affects the Haberfield/Ashfield community.

It is completely inappropriate, and not in the public interest, for a construction site for Australia's most significant road project to be located approximately 200m from a large primary school where more than 600 students are moving to and from the school every weekday. I believe the Planning Department to reject Option B outright. Option A, being the alternative combination of construction facilities presented in the EIS, would utilise existing construction areas which are located away from sensitive uses including schools and day care centres and presents a far safer option with materially less impacts.

Specifically I object for the following reasons:

#### **1. Traffic and pedestrian safety**

My primary concern about Option B is the very hazardous traffic conditions it will generate on a block in front of the school that is already problematic as a result of the M4 East Project.

I object to Option B because the light vehicle and heavy vehicle traffic it will generate will create real and significant safety risks for school children and their parents in travelling to and from the school during school drop-off and pick-up times, and when students go on excursions that involve walking to the train station, local ovals or other sites.

I always walk to and from school with my three children and have encouraged my older child to walk unaccompanied where I can to encourage independence. Currently he walks to school by himself three days per week. My only concern about him walking unaccompanied is traffic - and those concerns are not that he would do the wrong thing, but that a car would do the wrong thing. I have seen how cars drive near the school and they are often not mindful of children. This is worse if parents are stressed/late and when the traffic is busy (eg when it is wet or there is a traffic problem, including due to delays caused by the road works). I want my children to be able to develop their independence and one of the key obstacles to this is the increased traffic on our local roads caused by the Westconnex project.

I believe it is unacceptable, unsafe and lacking in common sense to locate construction sites that produce 170 daily heavy vehicle movements (140 at Parramatta Road West/30 at Parramatta Road East) and 160 daily light vehicle movements (10/150) only 200m from a primary school, on one of the primary routes families use to get to school on foot or in cars.

Due to traffic changes around Haberfield as part of the M4 East work, I have seen a significant increase in cars travelling along Bland St past the school. A child has been hit by a car on Bland St and required hospitalisation (luckily the outcome was not worse). Also, as far away as Dalhousie St traffic is speeding and earlier this year a car flew out of control and into the front wall of 15 Dalhousie St. Option B will make this significantly worse due to the congestion.

In particular:

- The proposed heavy vehicle ingress point to the Parramatta Road West site is located approximately 10m from the intersection of Bland Street and Parramatta Road which is used by a large number of students and parents in their commute to and from the school;
- This intersection is already the scene of many near-misses as drivers frustrated by increased traffic make dangerous choices, especially when turning right from Bland St, Haberfield into Parramatta Road. We believe this intersection requires turn-right green arrows from Bland St into Parramatta Road in both directions, and that the green light for pedestrians should go on first before the green light for cars, to give pedestrians time to cross the road before the traffic begins moving;
- The EIS outlines plans for temporary closures of one lane of Alt Street and Bland Street to establish construction vehicle access. This is unacceptable from a traffic impact and safety perspective given these streets are the main southern access routes to and from the school. It must be a condition of any approval that this never occur during school zone hours (8-9.30 am and 2.30-4pm);
- The EIS outlines plans for heavy vehicles to cross over Alt St on the Parramatta Road West site, which again is unacceptable from a safety perspective given the large number of students/families that use this road as a pedestrian route;
- The proposal would allow vehicles to enter the worker carpark (Parramatta Road East site) from Bland St and Alt St, which will lead to long-term significant traffic impacts along those streets and others near the school as workers use those residential streets to drive to the carpark. While we welcome the inclusion of a carpark given our experience of significant loss of street parking during the M4 East construction phase, we believe any cars entering the Parramatta Road East site must only be able to do so from Parramatta Road.

Furthermore, the EIS is so conceptual it does not include any traffic management plans, promising only to release a Construction Traffic and Access Management Plan (CTAMP) and carparking strategy at some later stage. Given our experience over the past year or so, this community has little confidence in SMC and its joint venture partners/contractors' ability to manage traffic and access at its construction sites. For example, we are aware of periods during the M4 East construction phase in which traffic spotters have not been on duty when heavy vehicles are moving in and out of the Brescia site around 3pm when high numbers of students are moving around, in breach of commitments. To produce a CTAMP after the project has been approved, and in a process that does not involve community consultation, is insulting and extremely poor process.

If, despite community objections, this proposal does go ahead, it must be on the following conditions:

- No road or lane closures during school zone hours.

- Limitations on where site related traffic (both heavy and light vehicles) can travel so that it does not go past the school.
- Pedestrian safety marshals at the Parramatta Rd/Bland St junction during all school zone hours. These marshals should be dedicated to pedestrian safety, not temporarily diverted from construction duties.
- Reconsider the major drop off areas for the school, including putting in place the necessary infrastructure (zebra crossings, all weather access) to have access to the school via Chandos St.
- Zebra crossings to be staffed by 'Lollypop' people.

## **2. Traffic congestion**

In addition to the safety concerns generated by the traffic changes roads around the school, Option B will significantly increase traffic congestion around the school. This will be particularly on Bland street but I expect this to impact surrounding roads as well. This compounds already increased traffic on these roads due to the M4 East work and subsequent tunnel opening.

## **3. Dust and air quality**

Anecdotally, many in the community are reporting respiratory conditions like asthma have been exacerbated by the current Westconnex work. The EIS reports that Option B carries a much greater potential to release dust and other pollutants into the air than Option A, especially in relation to the demolition and earthworks stages. Under both options, the risk for the 'track-out' activity is high.

I urge SMC and the Planning Department to reject the option that will have the greatest adverse impact on air quality and is the closest to a school, where young children with still-maturing respiratory systems spend at least six hours of each day.

Bland St and Alt St are popular pedestrian routes for the many Ashfield families whose children are enrolled at this school, therefore hundreds of students and their families will be further exposed to the dust and other pollutants as they walk directly past the Option B sites.

The EIS, says that the number of receptors (ie people) assumed to be affected at a school was 500. This is significantly below the number of students/staff/parents/outside-of-school hours care staff/other community members who spend their whole or part of their day at Haberfield Public School. The numbers would be well over 800 on any given day, a 60% increase on the EIS estimate. Depending on how long the project takes, there are additional 'receptors' who will be effected with subsequent intakes of kindergarten children.

Everyone in our local community remains concerned about the unfiltered ventilation stack located about 500m from Haberfield Public School. I continue to firmly believe that this stack must be filtered to limit the level of toxic vehicle emissions released into the atmosphere. I 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 the air released. In addition, I was horrified to hear that the same person who approved an unfiltered stack for Haberfield thought an unfiltered stack in his own electorate was unacceptable.

If, despite community opposition, Option B does go ahead, we must have:



- As much demolition as possible at surface level completed outside term time.
- Monitoring of air quality on an hourly basis - so that we can ensure that average air quality is not disguising high levels of pollutants at times when children are particularly exposed eg lunch and recess.
- The air monitoring station on the HPS site needs to be retained and the data reviewed for long term monitoring once the tunnels are open.
- Formal monitoring of adverse health effects experienced by students, particularly respiratory issues.

#### **4. Noise**

Under Option B, the Parramatta Road West civil and tunnel site is proposed to include tunnel excavation as well as stockpiling of excavated material and spoil haulage 24 hours a day, 7 days a week. I understand this operation will be similar to the operation currently occurring at the Northcote St site, where an acoustic shed now stands. Even with the acoustic shed, noise from machinery and other operations at Northcote St travels well beyond the 200m distance that exists between the Parramatta Road West site and the school.

I believe that similar noise as that generated by the tunnelling site at Northcote St will be heard from the school, with the potential to disrupt lessons and other classroom and schoolyard activities. This is an unacceptable situation and will have a detrimental impact on student learning. The noise will also impact yet another part of Haberfield and we have heard much about how little the residents have been considered in relation to the very noisy work on the M4 East project.

The high number of residents in Haberfield and Leichhardt who would require mitigation for night noise is unacceptable, particularly because promises of mitigation in Haberfield and St Peters during M4 East and M5 East projects have not offered adequate protection.

The EIS notes (Chapter 10, page 69) that the Yasmar Juvenile Justice facility next to Haberfield Public School will be one of the sensitive receivers predicted to exceed noise management levels at various times during the construction project. Given the M4 East experience – where noise has carried to homes and other buildings far more broadly than the EIS had forecast – it is difficult to imagine that the noise of rock breakers, spoil works or concrete saws would not carry to HPS.

I also note that M4-M5 Link Project Manager Peter Jones, in a WestConnex Community Reference Group meeting and in other conversations, has not ruled out flipping the works undertaken at the Muirs caryard sites. This would bring the tunnelling operation even closer to the school, and make it even more likely that noise would significantly disrupt student learning and other school activities.

If, despite community opposition, Option B does go ahead, we must have:

- The necessary noise mitigation undertaken at the school and on the site before construction begins.
- Remedial work must be done on the school building to provide appropriate acoustic protection (for example additional insulation, double glazing and other noise cancelling building work, potential for additional equipment such as noise cancelling headphones or similar).

- Clear parameters declaring that work will be halted immediately if noise is causing disruptions to lessons and other school activities.
- Defined rules about the timing for noisy activity to minimise the disruptive effects on children.

## **5. Toxic contaminants**

I am concerned about the toxic 'contaminants of potential concern' that may be dug up from the Parramatta Road West and East sites only metres away from the school, homes, and on pedestrian routes used by many students. As listed in Appendix Q, a large number of potentially dangerous contaminants are likely to be found at these sites, including asbestos, lead, metals, benzene and pesticides. It is deplorable to establish a construction site on a former caryard that will contain decades of dangerous waste and contaminants, just metres from a primary school and homes when other less-contaminated and already-utilised sites exist.

The Westconnex team acknowledged at the HPS Information night on 11 October 2017 that it is highly likely that a car yard and car service yard would have dumped contaminating material on site in the past and that they are likely to find asbestos.

The class action law suit in 20 years' time, when our children are dying from cancer and respiratory disease, will be no consolation if you recklessly disregard community safety now.

## **5. Spoil haulage**

I believe that in a document outlining 'M4-M5 design changes and commitments in response to community feedback', WestConnex has reduced the planned spoil haulage hours at Darley Road after residents expressed concern about heavy vehicles on a busy local road. The EIS proposes the spoil haulage hours under Option A and Option B in Haberfield/Ashfield to be 24/7. I 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. In particular I seek restrictions during school zone hours.

## **6. The 'hybrid' option or additional options**

Since the EIS was released, I have heard from numerous community members about other options being considered for the activities outlined for Option A and B. These additional options including a 'hybrid' model (where sites in both Option A and B are used), flipping the Parramatta Road West and East sites so that the tunnelling occurs on the Haberfield side, or having some sort of tunnel or shaft on the Haberfield side with a conveyor belt built over Parramatta Road to carry spoil across one of Sydney's busiest roads. At the HPS information night Peter Jones said that, aside from ensuring that the tunnels met up, no possibilities for the work had been ruled out.

No other options are canvassed in the EIS, but all seem to be on the table. This leaves the community in an invidious position – how are we supposed to object to or pass comment on proposals that are not outlined in any detail anywhere? When will we be consulted on these alternative options if one of them becomes the preferred option?

We demand that if an option not outlined in the EIS becomes the preferred option for construction, that it have traffic/noise/air quality etc modelling run and be released for community consultation in the same style as the EIS.

If Option B is approved against our community's strong wishes and in favour of the WestConnex authority and associated bodies, the community calls for effective and widespread mitigation measures to ensure our children's health, safety and learning is not adversely affected. We also request a process be instigated before construction begins, under which the school can report disruptions to children's learning, health or safety from noise/dust/vibration/traffic or other causes, and receive instant action to end the disruption.

### **General objections**

As well as the objections listed above to Option B, I have several general objections in response to the M4-M5 Link EIS.

#### **7. Misleading statements about future WestConnex construction work**

Since the M4 East concept phase in 2013 until earlier this year, WestConnex and its associated entities have been promising the Haberfield and Ashfield community that above-ground construction work would not be required following the opening of the M4 East stage. It was a condition of the M4 East approval that all Haberfield and Ashfield above-ground WestConnex construction sites were to be rehabilitated and returned to the community when the project finished. Now we find we are to be subject to a further four years of significant disruption caused by above-ground construction activities at many of the same sites, and the new ones outlined in Option B.

Our community has been grossly misled – it is galling to learn that we have been asked to tolerate 'temporary' impacts that we now know will stretch on for nearly a decade. We object to the EIS on the grounds that it is a breach of WestConnex's promises to our community. This project is significantly impacting the majority of my children's childhood growing up in an area we chose for its community feel and our ability to walk to all our local amenities. I can honestly say that if I had known what was in store for Haberfield I would not have moved to the suburb five years ago.

I am disappointed that the consultants have done no actual research into the impacts on communities of the construction of the M4East and New M5. The term 'construction fatigue' is not adequately explained or assessed by consultants. I ask that you travel to St Peters and Haberfield and talk to residents – ask them if the impacts have been acceptably managed. The approval of these stages was given on the basis that impacts could be satisfactorily mitigated – this has not occurred and this EIS approval should be mindful of the issues that are ongoing at these sites. I am appalled by the suggestion that these areas should be made to suffer more years of intolerable construction impacts.

In addition, to the effects on the community, I am personally impacted by the Project. Despite no mention in the EIS or elsewhere, I have been advised in recent months that the M4 East project intends to build a 7m high Variable Electronic Message sign in front of my property. This will significantly decrease the value of my property, which is in no way acknowledged by anyone on the project, and will also be a disruption, distraction, and eyesore for my family and anyone walking past. In addition we have already had speeding, distracted vehicles hit the front walls of both of the houses opposite us – a large sign will make this even more likely.

I object to the fact that, aside from arguably insufficient compensation for residents who have had their houses acquired for the Westconnex project, there has been no compensation for



any other residents who have been effected - particularly those who are living for years next to a noisy 24 hour construction site.

### **8. Conceptual nature of EIS/Preferred Infrastructure Report**

As mentioned in section 3, the EIS can be considered conceptual at best. I request the Department of Planning reject the EIS on the grounds that it does not provide any final details for significant elements of the project, including construction site layouts, access arrangements, traffic management plans and other elements of this significant infrastructure project.

The uncertainty around the final design and details generates considerable anxiety for our community as the precise impacts of the proposal are unclear and have not been properly assessed. Furthermore, the future process does not allow for community consultation on any future refined designs or tightening of the regulations in response to community concerns.

I understand the Sydney Motorway Corporation is already preparing its Preferred Infrastructure Report, which will include its final choice of option. We request that this report be made public as soon as it is filed with the Department of Planning and that residents be given the right to meaningful consultation on the actual plan, before a determination on this EIS application is made.

### **9. Lack of consultation**

I object to the EIS on the grounds that it fails the Secretary's requirement for "meaningful" consultation. To begin with, the EIS is such an unwieldy and complicated document that it is almost impossible for non-experts to understand, or to have the time to read thoroughly enough to make considered thoughts on all of the matters raised. This has even more impact on the large portion of our community who speak English as a second language who are noticeably more disengaged in providing community feedback. Despite constant requests to provide material in languages other than English to ensure residents of all backgrounds are consulted properly, I did not see evidence of any significant effort made to address this concern.

Furthermore, the EIS submission period included two weeks of school holidays, which severely constricted the time my school community could use to consult internally, liaise externally and prepare our response - and the extent to which anyone was even aware of what was proposed. I am aware of complaints that hundreds of residents within the proposed project zone were not even notified of feedback sessions.

### **10. Urban design and landscaping/community connectivity**

I am very disappointed that the M4-M5 Link EIS does not include more proposals to improve the urban design and community connectivity in the Haberfield region, that has been destroyed 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, including waterside walks, parklands, wetlands and improved cycling and pedestrian links such as new bridges over the City West Link. (Once again, we do note the EIS contains no detailed designs for these improved amenities - as per the previous comments about the conceptual nature of the EIS, these are still 'thought bubbles' and details will not be provided until the Urban Design and Landscape Plan is prepared.)

However, it appears that Haberfield/Ashfield has once again been overlooked. We are the community that had dozens of heritage properties demolished, has been asked to endure at least six years of highly-disruptive construction activity (M4 East/M4-M5 Link) and will live with two enormous tollway/portal roads dividing our communities at Parramatta Road and Wattle St. In Chapter 11, section 11.6.4 makes the point that community connection can be severed during and as a result of major transportation projects, and that children's development can be affected by heavy traffic. Yet our requests for improved pedestrian and cycling amenities continue to go unheard.

I request that this project focuses again on the Haberfield/Ashfield/Five Dock regions and develops improved plans for pedestrian and cycling activity. In particular, I request that the project improves the links across Wattle St/City West Link between Haberfield and Five Dock (potentially 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 (in particular a cycle/pram friendly overpass linking Ashfield Park (with its associated cycle routes) to Haberfield (and the cycle route along Dalhousie St).

### **Conclusion**

If a decision is made to approve Option B this will be a decision that puts money ahead of the health and safety of our community and the learning environment of local children.

I urge the Secretary of NSW Planning to advise the Minister to reject this EIS.

Regards

A handwritten signature in black ink, appearing to read 'Merinda Timpany', with a stylized, flowing script.

Merinda Timpany





# SUBMISSION: WESTCONNEX M4-M5 LINK



REPLY PAID 88146  
JO HAYLEN MP  
MARRICKVILLE NSW 2204

The Hon. Anthony Roberts,  
Minister for Planning  
GPO Box 5341, Sydney NSW 2001

Dear Minister,

I make the following submission in response to the Environmental Impact Statement for the **M4-M5 WestConnex Link**. I write to raise my strong objections and concerns about this project, namely:

- **EXTENDED CONSTRUCTION:** Construction in Haberfield and Ashfield will continue until at least 2022, with 24/7 tunnelling set to continue for years. This is a breach of faith with our local community, which was promised that construction for WestConnex would end in 2019;
- **CONSTRUCTION SITES:** Both the construction options spelled out in the EIS are unacceptable. Our community has lived through years of noise, dust and disruption, with very little enforcement of the Government's weak and ineffective conditions of approval. At minimum, construction times must be significantly reduced and there must be proper intra-agency coordination to ensure minimal impact for affected residents;
- **TRAFFIC AND PARKING:** This project will significantly increase local traffic in Haberfield and Ashfield, including heavy trucks for further spoil movements. Light vehicle movements will dramatically increase as workers use parking lots proposed in the EIS. I am also very concerned about the proposal for Liverpool Rd/Hume Hwy Ashfield to be used as a spoil route;
- **EXHAUST STACKS:** I strongly oppose unfiltered exhaust stacks in our local community and am concerned about the lack of data on the cumulative impacts on air quality of both the M4 East and proposed M4-M5 Link; Unfiltered stacks proposed for St Peters and Rozelle are entirely unacceptable;
- **LACK OF CERTAINTY:** The "indicative" aspects of the EIS provide little certainty as to 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. The subsequent Preferred Infrastructure Report must be made available for public scrutiny and feedback;
- **ROUTE:** I urge you to investigate alternatives that mitigate the disaster that is the first two stages of WestConnex without further impacting inner west communities.

I am also concerned about:

- The proposed electronic sign on Delhauss and Warrich Streets in Haberfield which seem to intend directing people onto rather than away from Haberfield local roads.
- The enormous and out of proportion <sup>negative</sup> effects on Haberfield Public School
- The construction preventing active transport - walking and cycling in local streets.
- The lack of additional active transport encouragement like pedestrian bridges

Yours sincerely,

DATE: 5 October 2017

NAME: Merrida Timpany

ADDRESS: 22 Delhauss St  
Haberfield

Email: merrida\_mike@yahoo.co.uk

Phone: 0411 795 386

**From:** [REDACTED]  
**Sent:** Mon, 16 Oct 2017 06:39:39 +0000  
**To:** [REDACTED]  
**Subject:** FW: Submission Details for Noelle Bairle (object)

**From:** system@accelo.com On Behalf Of Noelle Bairle  
**Sent:** Monday, 16 October 2017 5:21:04 PM (UTC+10:00) Canberra, Melbourne, Sydney  
**To:** [REDACTED]  
**Subject:** Submission Details for Noelle Bairle (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Noelle Bairle  
[REDACTED]

Address:  
[REDACTED]

Leichhardt, NSW  
2040

Content:

I am against the proposed Dive site in Darley road for the following reasons;

It can easily be placed at the empty space at Rozelle rail yards instead of in a heavily residential area such as Darley road and all our residential nearby streets of Francis Charles Hubert and Elswick and Williams streets being so badly affected.

Firstly safety is a number one issue. The dive site is next to a main crossing to the light rail and Blackmore park which is used heavily by local school children and residents. There is also the issue that the Darley road site affects Darley road being a heavily used entry point for commuters to the city west link. The trucks will mean more cars forced to do a rat run route or be impacted by the trucks heavily using the road. Add to this the health issues associated with added noise, pollution, loss of sleep from trucks at the dump site day and night, and amenity. There must be a better solution than destroying the quality of living for local residents.

[REDACTED]  
 Submission: Online Submission from Noelle Bairle (object)  
[https://majorprojects.accelo.com/?action=view\\_activity&id=228240](https://majorprojects.accelo.com/?action=view_activity&id=228240)

Submission for Job: #7485 WestConnex M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)





**From:** [REDACTED]  
**Sent:** Mon, 16 Oct 2017 06:43:02 +0000  
**To:** [REDACTED]  
**Subject:** FW: Submission Details for Lindsay Clare of Clare Design (object)

**From:** system@acelo.com On Behalf Of Lindsay Clare  
**Sent:** Monday, 16 October 2017 5:41:05 PM (UTC+10:00) Canberra, Melbourne, Sydney  
**To:** [REDACTED]  
**Subject:** Submission Details for Lindsay Clare of Clare Design (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Lindsay Clare  
 Organisation: Clare Design (Director)  
 [REDACTED]

Address:  
 [REDACTED]

Maroubra, NSW  
 2035

Content:  
 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 Embarcadero 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 undetailed:

- 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 there are no stops. No other city in the world 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.

  
Submission: Online Submission from Lindsay Clare of Clare Design (object)  
[https://majorprojects.accelo.com/?action=view\\_activity&id=228252](https://majorprojects.accelo.com/?action=view_activity&id=228252)

Submission for Job: #7485 WestConnex M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link  
[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)

**From:** [REDACTED]  
**Sent:** Mon, 16 Oct 2017 06:51:42 +0000  
**To:** [REDACTED]  
**Subject:** FW: Submission Details for helena keywroth (object)

**From:** system@acelo.com On Behalf Of helena keywroth  
**Sent:** Monday, 16 October 2017 5:50:03 PM (UTC+10:00) Canberra, Melbourne, Sydney  
**To:** [REDACTED]  
**Subject:** Submission Details for helena keywroth (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: helena keywroth  
 [REDACTED]

Address:  
 [REDACTED]

rozelle, NSW  
 2039

Content:  
 To

I would like to lodge my concern about the proposed M4-M5 link. As someone who lives near Victoria Rd, I do not understand why the plan for the link is so complex. Would it not be easier just to have a right lane tunnel from iron cove bridge, heading east, just to go under the existing Victoria rd, and join onto The Crescent and City West link, heading south.

That way the morning traffic going into the city, which by the way isn't that bad, (once 9am hits it only takes me 10min to drive to the city), as most people now take buses or cycle or walk. The lane turning right on to City West Link at the end of Victoria rd would no longer be needed so the traffic in that lane could then turn left into the city.

Reversing that, for traffic coming out of the city, I think we should wait to see how the existing upgrades being built effect traffic flow.

Ultimately if the money being spent on this project, was instead used to build the new proposed airport, bus lanes, train lines with large free parking areas, that would ease future traffic issues in the inner city more substantially.

yours sincerely

H Keyworth

[REDACTED]  
 Submission: Online Submission from helena keywroth (object)

[https://majorprojects.accelo.com/?action=view\\_activity&id=228257](https://majorprojects.accelo.com/?action=view_activity&id=228257)

Submission for Job: #7485 WestConnex M4-M5 Link

[https://majorprojects.accelo.com/?action=view\\_job&id=7485](https://majorprojects.accelo.com/?action=view_job&id=7485)

Site: #3247 M4-M5 Link

[https://majorprojects.accelo.com/?action=view\\_site&id=3247](https://majorprojects.accelo.com/?action=view_site&id=3247)



**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 Tillet

Signature: *Amanda Tillet*

*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 Flora St

Suburb: Erskineville

Postcode 2123

*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.*

- A review of RMS traffic counts on numerous arterial routes within the 'sphere of influence' of the Project have shown no growth in traffic since 2006. During this period Sydney's population (as measured by the Greater Capital City Statistical Area) has grown at a rate of 1.5% per annum on average. Roads measured:

- Parramatta Rd at Ashfield (station 25002), Leichhardt (station 20012), Five Dock (station 30005) and Annandale
- ANZAC Bridge (station 20001)
- Anzac Parade Moore Park (station 03022 b/w 2008 and 2017)
- Cleveland Street (station 03022)
- Sydney Harbour Tunnel (station 01003)
- O'Riordan Street (station 02309)
- Sunnyholt Road Blacktown (station 69198)
- General Holmes Drive Brighton-Le-Sands (station 23055)
- King Georges Rd Roselands (station 24026)

For example The St Peters / Sydney Park Interchange will overload the Mascot road network. As a result traffic levels were reduced to fit the modelling.

- Unreliable traffic projections lead to significant and compounding errors in the design, EIS and business case processes, including:

- Dimensioning of motorway tunnels and interchanges (on- and off-ramps) and expansion of roads feeding traffic to and discharging traffic from the toll road
- Assessment of the project's traffic impacts on other parts of the street network
- Assessment of overall traffic generation and induced traffic associated with the project
- Emissions based on traffic volume and driving style (e.g. stop-start driving in congested traffic leads to higher emissions impacts)
- Toll earnings and financial viability, which could trigger compensation claims or negotiated underwriting that would materially undermine the State budget position given the cost of the project.
- Other key inputs to the business case that are derived from strategic traffic modelling, including: purported reductions in crashes, purported improvements in productivity etc.

- 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

**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: Nadine Moffat

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: 37 Carlisle Street

Suburb: Leichhardt 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

- ◇ (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

- ◇ 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

- ◇ EIS is Indicative only - 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. 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. This means the community will have limited say in the management of the impacts identified in the EIS. The EIS needs to provide an opportunity for the community to meaningfully input into this report and approval conditions.

**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:

KARA WIHAPI

Signature:

K. Wihapi

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:

32 BANCROFT ST

Suburb:

OAKHURST

Postcode

2761

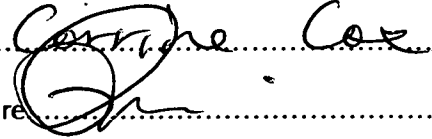
**I object to the WestConnex M4-M5 Link proposals for the following reasons:**

- 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.
- 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.
- Easton Park has a long history and is part of an urban environment which is unusual in Sydney. The park needs to be assessed from a visual design point of view. It will be quite a different park when its view is changed to one of a large ventilation stack. The suggestion that it has been 'saved' needs to be considered in the light of the severe 5 years construction impacts and the reshaped urban environment.
- 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.
- I oppose the removal of further homes of Significance in either Haberfield or Ashfield. The level of destruction has already been appalling. Residents were led to expect that there would be no further construction impacts after the completion of the M4 East. The loss of further houses of the community will cause further distress within this community.
- 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.

**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: <u>Carrine Cox</u>	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature: 	Attn: Director – Transport Assessments
Please <b>include</b> my personal information when publishing this submission to your website <b>Declaration</b> : I <b>HAVE NOT</b> made any reportable political donations in the last 2 years.	Application Number: SSI 7485 Application
Address: <u>1/9 Trade St</u>	Application Name: WestConnex M4-M5 Link
Suburb: <u>Newtown</u> Postcode: <u>2042</u>	

**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) *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.*
- 2) *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.*
- 3) *The EIS admits that it is not even known what excavation would be undertaken at the White Bay Power station. I am particularly concerned about the old water channels and the southern penstock which are part of Sydney's industrial heritage. How could an EIS for such a major project be put forward on this basis? It is fatuous to state that "physical and indirect impacts on this heritage element should be avoided" and suggest that a future plan should be done. Why isn't the need for excavation known? This raises great concerns about the 'indicative only' nature of the work that has been done before this EIS. Why is there such a rush? This EIS is not complete and should be rejected for that reason.*
- 4) *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 object to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the reasons set out below.**

Name:..... Ralph Bergman .....

Signature:..... Ralph Bergman .....

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:..... 29/8 Cavill Ave .....

Suburb:..... Ashfield 2131 .....Postcode..... 2131 .....

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. It is clear from reading the EIS that the impacts of the project on traffic congestion and travel times across the region during five years of construction will be negative and substantial. Five years is a long time. At the end of the day, the result of the project will also be more traffic congestion although not necessarily in the same places as now. There needs to be a serious cost benefit analysis before the project proceeds further.
- 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. Flooding – Leichhardt. Darley Road and adjacent streets such as Hubert St are exposed to flood. The flood impact could be exacerbated by the disruption or blockage of existing drainage networks, which are risks identified in the EIS. The EIS has not assessed whether the identified risk to the existing drainage network will cause increased risk of flood damage to flood lots and it fails to take account of the Inner West Council's Leichhardt Floodplain Risk Management Plan which contains recommended flood modification options. The EIS has not assessed whether its drainage infrastructure will impede the Inner West Council's Leichhardt Floodplain Risk Management Plan option HC\_FM3 to lay additional pipes/culverts from Elswick Street to Hawthorne Canal (via Regent Street and Darley Road). RMS has not assessed whether its drainage infrastructure will impede Inner West Council's Leichhardt Floodplain Risk Management Plan option HC\_FM4 to lay additional pipes/ culverts from William Street to Hawthorne Canal via Hubert Street and Darley Road. The EIS should not be approved as it has not properly explained or assessed these impacts.
- IV. 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.
- V. Are there other potentially serious problems with Sydney Water utility services (described at EIS 12-57) or with other utilities in other suburbs or along the proposed M4-M5 tunnel alignment ? If so, the EIS proposals and application should not be approved till these are all disclosed, researched, surveyed and the resolution publicly published.

**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:

Marry Faurk

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:

168A St George Pde

Suburb:

Albion

Postcode

2218

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

- I. 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.
- II. 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.
- III. 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.
- IV. The EIS at 7-21 states that Community update Newsletters were distributed to residents 'near the project footprint' in many suburbs. This statement is simply not correct. No such newsletters were received by residents in central and northern Newtown. SMC was made aware of this fact, but has not responded to verbal and written requests for audited confirmation of the addresses 'letterboxed'. This statement of community engagement should be rejected by the Department.
- V. 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.
- VI. The EIS identifies hundreds of negative impacts of the project but always states that they will be manageable or acceptable even if negative. This shows the inherent bias in the EIS process.
- VII. It is outrageous to suggest that four unfiltered stacks would be built in one area in Rozelle

**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: Jasmine Samson

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: 307 King Street

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

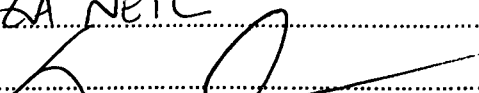
Application Name: WestConnex M4-M5 Link

- A. 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.
- B. 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.
- C. 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.
- D. Rather than adding to pollution, the NSW government should be seeking ways to reduce emissions. It is not acceptable to argue that worsening pollution is not a problem simply because it is already bad.
- E. 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.
- F. 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.
- G. 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

**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: ELIZA NEIL  
 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: 21 RAILWAY AVE  
 Suburb: STANMORE NSW Postcode: 2048

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. Rozelle Rail Yards will have 400 car parking spaces provided for workers(EIS). The daily workforce for these sites is stated to be approximately 550. This means that 150 vehicles will need to park in nearby local streets which are already over-subscribed during weekdays by commuters taking the light rail.
- B. 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.
- C. 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.
- D. 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.
- E. SMC have made it all but impossible 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. Monday and Wednesday: 10am to 7pm. Tuesday: 10am to 6pm. Thursday and Friday: 10am to 5pm. Saturday and Sunday: 11am to 4pm. This restricted access does NOT constitute open and fair community engagement.
- F. I am deeply disappointed that the 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. This is a dangerous and reckless attempt to get approval for a project that is yet to be properly designed.
- G. 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.

**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: Ondrej SASKA

Signature: [Handwritten 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: 2/59 Wilson St

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

Application Name: WestConnex M4-M5 Link

- a. 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)
- b. 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.
- c. Recently Andrew Constance has been quoted numerous times promoting his vision of the transport future and some of these views are aired in the EIS but the vision put forward is highly visionary with no practical detail addressing how these changes are going to be brought about and so they are totally unrealistic. For example it is starting to be commonly accepted that car manufacturers will be reducing production of petrol/diesel cars before 2040 probably starting in 2030. It is proposed that electric cars will then take over. It is suggested that cars will be charged over night at people's homes. Virtually no one in the Inner City Suburbs has a garage. Are all the streets throughout all the suburbs going to be fitted out with charging points outside all the houses, similar to parking meters? We have all watched the shambles of the rolling out of the NBN it would be mind blowing to watch what would happen with the rolling out of charging points to each household without a garage and it would take years to achieve. There are virtually no recharging points at any Fuel Stations anywhere as yet and to set these up will take years. A large part of the population run older cars, because that is all they are able to afford. It will take many years for these petrol/diesel cars to disappear. Andrew Constance has also said that when everyone is driving an autonomous car average speeds will be reduced but as they are not being controlled by individual drivers this will mean they will be able to travel much closer together and so there will not be so much delay caused by spread out congestion. If this is to be so perhaps the suggestion could be made that some mechanism could be employed which would enable these cars to link together; if that could be done then they could form -a TRAIN - and then really travel at speed!
- d. 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.

**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: Peter F. Hicks

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: 31-51 Talion St

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

1. 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.
2. 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.
3. The presence of 170 heavy and light vehicle movements a day at this site will create an unacceptable risk to students. The EIS should not permit any truck movements near the Darley Road site. The alternative proposal which provides that all spoil trucks enter and leave from the City West link is the only proposal that should be considered.
4. 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.
5. We object to the location of the Darley Road civil and construction site because 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. It is already congested at peak hours and 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.

6. 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.
7. 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.

**Campaign Mailing Lists:** I would like to volunteer and/or be informed about the anti-WestConnex campaign's - 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: <u>Kronica Black</u>	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature: <u>[Signature]</u>	Attn: Director – Transport Assessments
Please <b>include</b> my personal information when publishing this submission to your website <b>Declaration</b> : I <b>HAVE NOT</b> made any reportable political donations in the last 2 years.	Application Number: SSI 7485 Application
Address: <u>25 Brown Street</u>	Application Name: WestConnex M4-M5 Link
Suburb: <u>Newtown</u> Postcode: <u>2042</u>	

**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) 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.
- b) 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 where 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.
- c) 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."
- d) 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.

**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: Mikey Mikey Grogan  
 Signature: McGrogan

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: 19 Illawong Avenue  
 Suburb: Caringbah Postcode 2229

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) 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.
- b) Generally the risk of settlement is lessened where tunnelling is more than 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.
- c) 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.
- 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.

**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:

Hiem Grimes

Signature:

Grimes

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:

89 Juliett St

Suburb:

Marrickville

Postcode

2204

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

- A. The original objectives of the project specified improving road and freight access to Sydney Airport and to Port Botany. We now have proposals for Stages 1,2 and 3 and none achieve this goal. The community is asked to support this proposal on the basis of other major unfunded projects, which are little more than ideas on a map. This is NOT the way to plan a liveable city
- B. No noise barriers have been proposed. This is unacceptable and appropriate noise barriers should be included in the EIS for consideration. (Executive Summary xvii)
- C. 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. 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 for 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.
- D. There has been no 'meaningful' consultation with the community. Some areas affected by M3/M5 have not even been letterboxed by SMC. These include St Peters and sections of Erskineville. The SMC received hundreds of submissions on its concept design and failed to respond to any of these before lodging this EIS.
- E. The EIS at 12-57 describes potentially serious problems where mainline tunnels alignment crosses key Sydney Water utility services that service Sydney's eastern and southern suburbs. Why is SMC proposing tunnelling within metres of these critical services when no accurate surveying has been done? And when there is only limited information available about the strength of these water tunnels? 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.

**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 \_\_\_\_\_

<b>Submission to : Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001</b>	<b>Name:</b> <i>Lauren</i> <b>Signature:</b> <i>[Signature]</i>
<b>Attention: Director – Transport Assessments</b>	Please <u>include</u> my personal information when publishing this submission to your website <b>Declaration: I HAVE NOT</b> made any reportable political donations in the last 2 years.
<b>Application Number: SSI 7485 Application Name: WestConnex M4-M5 Link</b>	<b>Address:</b> <i>28 Levingham St</i> <b>Suburb:</b> <i>Dulwich Hill</i> <b>Postcode</b> <i>2203</i>

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) 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.
- b) 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.
- c) There are two areas in the Rozelle Rail Yards site where construction will be by cut and cover. These are the Portals for the Western Harbour Tunnel and the Portals for the M4/M5 link. This is of particular concern in the light of residents experiences in areas of Haberfield and St Peters where highly contaminated land areas were being disturbed. There was totally inadequate control of dust in these areas, where the dust would have been loaded with toxic chemical particulates. The old Rail Yards are highly contaminated land from their past use. The EIS gives no specific details of how this highly toxic threat is going to be securely managed. It is not acceptable for this to be decided only when the Construction Contracts have been issued, when the community will have no say or control over the methodology to be employed for removing vast amounts of contaminated spoil.
- d) 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.

**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: Hannah WalkerSignature: 

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 Meeks RoadSuburb: Marrickville Postcode 2204**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 M4/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**

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:

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:

Suburb:

Postcode

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

- 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.
- 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.
- 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.
- 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 M4/M5 tunnel would further add to this loss.

- 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.
- 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 \_\_\_\_\_

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

Name: Jack Colwell

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: 107/2a, Haberfield St

Suburb: Glebe 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

- 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 23<sup>rd</sup> 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.

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <u>Callum Hui</u>
	Address: <u>22 / 1-19 Regent St</u>
Application Number: SSI 7485	Suburb: <u>REDFERN</u> Postcode <u>1545</u> <u>2016</u>
Application Name: WestConnex M4-M5 Link	Signature: <u>[Signature]</u>
Please <b>include</b> my personal information when publishing this submission to your website <b>Declaration</b> : I <b>HAVE NOT</b> 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:

- 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 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.
- 371 homes and hundreds of residences near the Darley Rd construction site will be affected by noise sufficient to cause sleep disturbance. The EIS promises negotiation over mitigation on a one by one basis. This is not acceptable to me. On other projects those with less bargaining power or social networks have been left more exposed. There is no certainty in any case that additional measures would be taken or be effective. This is another unacceptable impact of this project and reason why it should be opposed:
- 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. 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.
- 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.

**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: Zoe Stojanovic - Hill

Signature: Zoe Hill

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: 80 Cliff Avenue

Suburb: Northbridge Postcode: 2063

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. 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.
- II. 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.
- III. I strongly object to the privatisation of the WestConnex project that turns public monies into private profit.
- IV. 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.

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

Name: Loise Sree

Signature: [Signature]

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

Address: 12 Melon St

Suburb: Stammore Postcode: 2048

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

- ✓ We 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.
- ✓ Tunnel depths the tunnel depths for the Leichhardt area as low as 35 metres. This creates an unacceptable risk of damage to homes due to settlement (ground movement). The EIS acknowledges that at tunnelling at 35 metres and less this is a real risk. There is no mitigation provided for this risk. Instead, it states that properties will be repaired at the Government's expense. However no details or assurance as to how this will occur are provided. The project should not be approved with such tunnelling depths permitted and with no detail as to the extent of damage and how and when it will be repaired. It will lead to the situation where residents and businesses are forced to engage structural engineers and lawyers to prove that the damage was linked to Westconnex works, with no assurance that this property damage will be promptly and satisfactorily fixed.
- ✓ 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.
- ✓ 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.
- ✓ The presence of 170 heavy and light vehicle movements a day at this site will create an unacceptable risk to students. The EIS should not permit any truck movements near the Darley Road site. The alternative proposal which provides that all spoil trucks enter and leave from the City West link is the only proposal that should be considered.
- ✓ 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.

**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: Virginia Spear

Signature: V. Spear

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: 50 Percival St

Suburb: Wilyfield Postcode: 2046

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 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 sight 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.
- Impacts not provided – Permanent water treatment plant and substation – The EIS states that there will be an office, worker parking and buildings to accommodate this facility on a permanent basis. It does not provide any detail as to – noise impacts, numbers of workers on site, any health risks associated with the facility. This is simply inadequate and the decision to locate this facility should be subject to a thorough assessment and approval process. It should not be approved as part of this EIS as there is simply no detail provided about the impact of this facility on the amenity of the area.
- 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.
- 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 in increase the green space for residents and result in a pleasant green environment for pedestrians, rather than a fenced facility.
- 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.

Submission to: Planning Services Department of Planning and Environment GPO Box 39, Sydney, NSW 2001	Name: <i>Virginia Spear</i>
Attention: Director – Transport Assessments	Signature: <i>V. Spear</i> Please <b>include / delete (cross out or circle)</b> my personal information when publishing this submission to your website. <b>Declaration: I HAVE NOT</b> made any reportable political donations in the late 2 years.
Application Number: SSI 7485 Application Name: WestConnex M4-M5 Link	Address: <i>50 Melville St</i> Suburb: <i>Willyweld</i> Postcode: <i>2040</i>

I am registering my strong objections to Stage 3 of Westconnex and the application should be refused

The EIS has so many uncertainties of what is being proposed that it should not even be accepted as an EIS. It is no more than a concept design. The Rozelle underground Interchange is little more than a design concept. It shows that there will be three levels of tunnels crossing under densely settled urban streets. When questioned at SMC sessions designers told residents that there was not yet any engineering solution to this proposal and as yet no constructional plans or details. It is totally unacceptable to approve such a concept with so little detail.

AECOM is the company responsible for this EIS. It has a known record of wrongly predicting traffic. As has been the case in the past with this company there are already reports that the traffic for all stages of WestConnex have been overestimated and the costs underestimated. This means that the whole case for the project is flawed. Insufficient attention in the EIS has been paid to the social and economic impacts of tolls and the preparedness of the community to pay them.

The original objective of Westconnex was the connecting of Port Botany to Western Sydney and for a freight improvement access to the Airport and Port Botany. Stages 1, 2 and 3 do not fulfil this objective and this is not addressed in the EIS.

I am also very concerned that AECOM, a company that had been sued for misleading traffic projections, was selected to prepare the EIS traffic report, especially since the air quality and noise studies depend on the accuracy of the traffic report.

The WRTM model used for the traffic report has been found by independent research to be flawed. Worse still it is not publicly available, which makes it impossible for its assumptions to be tested. Inner West roads that will be impacted by traffic flows either from or avoiding the portals are excluded from the traffic modelling.

The time saving claimed as benefits in the EIS for earlier stages of Westconnex are no longer claimed in this EIS. In the EIS for earlier stages it was claimed that Westconnex would save motorists 40 mins time saving from Parramatta to the Airport. Now in this EIS for Stage 3 this has been radically downgraded to, "Between Parramatta and Sydney Airport, average peak period travel times are forecast to reduce by about 10 minutes." An investigation into the claims made in the earlier EIS, which will now not eventuate, should be undertaken.

The questionable traffic analysis shows that even if this tollway and all other proposed tollways are completed, the City West Link, Johnston St, the Crescent, Catherine St, Ross St, the St Peters Interchange and Frederick Street in Ashfield will all be considerably more congested in 2033 if the project goes ahead than without it.

The proposed Darley Road dive-site is opposed by the Inner West Council. Council traffic planners and the independent engineers engaged by the Council have stated that Darley Rd is entirely unsuitable for numerous reasons not least of which is the plan to run 170 heavy and light vehicle movements a day in a known accident black spot area. There are no details in the EIS as to how this will be managed.

Serious questions have been raised and continue to be raised concerning the land dealings involving the Darley Road site. These questions must be thoroughly investigated before NSW Planning proceeds in approving this construction site. If approved without investigation this will cost tax payers \$15 million in compensation.

The EIS Air quality analysis shows that PM10 levels near the Sydney Fish Market and in the surrounding area will increase when Westconnex is opened in 2023. PM10 is a carcinogen; World Health Organisation studies have found it linked to increases in lung cancer rates. It is completely unacceptable for a road project to be approved that increases PM 10 concentration in areas that are residential or are beside people's workplaces.