

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: FW: Submission Details

From: system@acelo.com On Behalf Of [REDACTED]
Sent: Sunday, 15 October 2017 11:14:00 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]

Crows Nest, NSW
 2065

Content:

I object to the M4M5 Link. Modern cities throughout the world are not building inner city freeways - it is recognised that these do not fix congestion or journey time. Any relief is temporary and traffic returns to its congested state as more people choose to drive. Many cities are removing freeways or roads to create more livable cities.

The M4M5 includes the start of the tunnels for the Western Harbour Tunnel and Beaches Link (WHT & BL). This project should not be started via an EIS for another project. Including these tunnels is advancing the project by stealth and the WHT & BL has had no environmental assessment and has not been designed yet. There has been no meaningful community involvement in the WHT & BL. tunnels

One of the objectives of the M4-M5 is to facilitate the Western Harbour Tunnel and Beaches Link - this is unacceptable when it is still in the developmental phase.

This EIS identifies the Western Harbour Tunnel as mitigation for the impacts of the M4-M5 Link. This creates the need for the unapproved WHT & BL. The M4-M5 Link will overload the Anzac Bridge with traffic- this then leads to the another means of moving traffic.

The M4-M5 Link will encourage additional traffic on to the road network, creating further congestion. It will lead to increased traffic on local roads - as either feeder roads or exits form the freeway.

Additional traffic on local roads will also occur though drivers seeking to avoid paying tolls.

Building tolled roads puts further financial pressure on people and families. It is likely that the tolls will rise faster than wages growth.

IP Address:

Submission: Online Submission from (object)

https://majorprojects.accelo.com/?action=view_activity&id=227842

Submission for Job: #7485 WestConnex M4-M5 Link

https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

From: [REDACTED]
Sent: Sun, 15 Oct 2017 12:26:09 +0000
To: [REDACTED]
Subject: FW: Submission Details for Holly Gorman (object)
Attachments: 227844_HG EIS Objection b_2017Oct15_2315.pdf

From: system@accelo.com On Behalf Of Holly Gorman
Sent: Sunday, 15 October 2017 11:16:16 PM (UTC+10:00) Canberra, Melbourne, Sydney
[REDACTED]
Subject: Submission Details for Holly Gorman (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Holly Gorman
[REDACTED]

Address:
[REDACTED]

Rozelle, NSW
2039

Content:
I have attached my submission objecting to this project.

[REDACTED]
Submission: Online Submission from Holly Gorman (object)
https://majorprojects.accelo.com/?action=view_activity&id=227844

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

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

Holly Gorman
28 Callan Street, 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

I have lived in Rozelle for over 18 years at our home at 28 Callan Street. My grandmother also lives in Rozelle. Rozelle represents the best of Australian communities: people care and support each other and are passionate about protecting the unique qualities of a vibrant village. The proposal identified in the EIS threatens the very fabric of our community and puts the health and safety of thousands of people at risk.

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.

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 for my parents should my house be damaged by this proposal.

I demand the State government compensate my family for the loss of value of our properties, stress and anxiety caused by this proposal, inconvenience and disruption to our 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,

Holly Gorman

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <i>Holly Gorman</i>	
	Address: <i>28 Callan St</i>	
Application Number: SSI 7485	Suburb: <i>Rozelle</i>	Postcode <i>2039</i>
Application Name: WestConnex M4-M5 Link	Signature: <i>Holly Gorman</i>	
Please include my personal information when publishing this submission to your website Declaration : I HAVE NOT made any reportable political donations in the last 2 years.		

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

- The EIS refers to be construction impacts as being 'temporary'. I do not consider a five year construction period to be temporary.
- I do not consider it acceptable that cycling/pedestrian routes should be changed for four years in Annandale and Rozelle in ways that will make cycling more difficult and walking less possible for residents with reduced mobility. These are vital community transport routes.
- The EIS states that property damage due to ground movement may occur. We object to the project in its entirety on this basis. The EIS states that 'settlement, induced by tunnel excavation, and groundwater drawdown, may occur in some areas along the tunnel alignment'. The risk of ground movement is lessened where tunnelling is more than 35 metres. However, some tunnelling is at less than 10 metres. This proposed tunnel alignment creates an unacceptable risk of ground movement. In addition, the EIS states that there are a number of discrete areas to the north and northwest of the Rozelle Rail Yards, to the north of Campbell Road at St Peters and in the vicinity of Lord Street at Newtown where ground water movement above 20 milliliters is predicted 'strict limits on the degree of settlement permitted would be imposed on the project' and 'damage' would be rectified at no cost to the owner. would be placed (Executive Summary, xvii -iii). The project should not be permitted to be delivered in such a way that there is a known risk to property damage that cannot be mitigated to an acceptable level of risk.
- 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.
- It is outrageous to suggest that four unfiltered stacks would be built in one area in Rozelle
- 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.
- I am completely opposed to approving a project in which the Air quality experts recommend rather than filtrating stacks extra stacks could be added later.

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 _____


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	Address: <i>28 Callan St</i>	
Application Number: SSI 7485	Suburb: <i>Rozelle</i>	Postcode <i>2039</i>
Application Name: WestConnex M4-M5 Link	Signature: <i>Holly Gorman</i>	
Please include my personal information when publishing this submission to your website Declaration : I HAVE NOT made any reportable political donations in the last 2 years.		

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

- The volume of extra heavy traffic in the Rozelle area and the acknowledged impact this will have on local roads is completely unacceptable to me.
- 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.
- 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.
- I am appalled to read in the EIS that more than 100 homes across the Rozelle construction sites will be severely affected by construction noise for months or even years at a time. This would include hundreds of individual residents including young children, school students and people who spend time at home during the day. The predicted levels are more than 75 decibels and high enough to produce damage over an eight hour period. Such noise levels will severely impact on the health, capacity to work and quality of life of residents. NSW Planning should not give approval to a project that could cause such impacts. Promises of potential mitigation are not enough, especially when you consider the ongoing unacceptable noise in Haberfield during the M4East construction.
- The EIS claims to have saved Blackmore Park and Easton Park due to negative community feedback. I am concerned that this is a false claim and that this site was never really in contention due to other physical factors. I would like NSW Planning to investigate whether this claim is correct to have heeded the community is false or not.
- The 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)
- The EIS states that 'a preferred noise mitigation option' would be determined during 'detailed design'. This is unacceptable and residents have no opportunity to comment on the detailed designs. The failure to include this detail means that residents have no idea as to what is planned and cannot comment or input into those plans. (Executive Summary xvi)

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Please include 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 object to the selection of Darley Road as a civil and construction site on the following grounds.
2. I object to the proposal that 170 heavy and light vehicle movements a day will occur at this site. This will create an unacceptable risk to pedestrians and bicycle users. 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. The EIS does not mention that 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.
3. I object to the location of a permanent substation and water treatment plant following the completion of the project on the Darley Road site. This will limit the future uses of the land and the community has been continually assured that the land, which is Government-owned, would be available for community purposes. The presence of this facility will forever prevent the ability for safe and direct pedestrian access to the light rail stop, with users required to walk down a dark and winding path. It will also limit the future use of the site. If a permanent facility is to be located then it should be moved to the north of the site so that it is out of sight of homes and has less visual impact on residents.
4. 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.
5. 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.
6. 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.

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Application Number: SSI 7485	Address: <i>28 CALLAN ST</i>
Application Name: WestConnex M4-M5 Link	Suburb: <i>ROZELLE</i> Postcode <i>2039</i>
Signature: <i>Holly Gorman</i> Please include 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)

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Name _____ Email _____ Mobile _____

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: HOLLY GORMAN
	Address: 28 CALLAN ST
Application Number: SSI 7485	Suburb: ROZELLE Postcode 2039
Application Name: WestConnex M4-M5 Link	Signature: 
Please include my personal information when publishing this submission to your website Declaration : I <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 object to the selection of Darley Road as a civil and construction site on the following grounds.
2. The period of construction proposed is unacceptably long. Leichhardt residents were repeatedly told by SMC that the Darley Road site would be operational for three years while the EIS states that it will be operational for 5 years. This period creates an unacceptable impact for residents. The works on the site should be restricted to a three-year program as was promised.
3. The noise impacts of construction are not able to be mitigated to an acceptable level and the EIS should not be approved on this basis. The EIS states that 36 homes will have unacceptable noise impacts for extended periods at the Darley road construction site. The EIS does not mention the cumulative impact of aircraft noise in the Leichhardt or St Peters area, and therefore does not reflect the true impact of construction noise on the amenity of nearby residents and businesses.
4. No truck movements should be permitted on Darley Rd or any local roads in Leichhardt or adjoining suburbs. The EIS should not be approved on its current basis which provides for 170 heavy and light vehicles accessing Darley Road on a daily basis. This will create unacceptable safety issues and noise impacts for adjacent homes while also compromising pedestrian and bicycle access to the light rail and bay run. It will also lead to truck chaos on this critical arterial road providing access to and across the City West Link. The EIS states that an alternative truck movement is proposed which involves use of the City West Link and no need for spoil trucks to access Darley Road. I object to the selection of the Darley Rd site altogether, but propose this alternative, which appears to represent the least worst impact, should be chosen if this site is to be used.
5. I object to the number of truck movements proposed at the Darley Road site. The EIS states that there will be daily movements of 170 heavy and light vehicles accessing Darley Road. This creates an unacceptable risk to the safety of pedestrians accessing the North Leichhardt light rail stop as well as bicycle users accessing the bicycle route on Darley Road and entering Canal road to join the dedicated bike paths on the bay run. Many school children cross at this point to walk to Orange Grove and Leichhardt Secondary College. The EIS states that an alternative truck movement is proposed which involves use of the City West Link with no trucks to access Darley Road. The selection of Darley Road should not be approved if it involves any truck movements on Darley Road, as is currently provided.
6. No workers associated with the WestConnex project should be permitted to park on local streets. Parking is at a premium in this area and many residents 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 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 and provide a plan for enforcement (to be paid for by SMC and not by the Inner West Council).

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Application Number: SSI 7485	Suburb: ROZELLE Postcode 2039
Application Name: WestConnex M4-M5 Link	Signature: <i>Holly Gorman</i>
Please <u>include</u> 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:

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 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 has many caveats and depends upon further steps (such as traffic management plans), the detail of which is not provided. The community has no certainty that any of the impacts from construction will be managed to an acceptable level.
3. 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.
4. 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)
5. 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)
6. There are 36 homes identified as having severe noise impacts during construction in Leichhardt and Lilyfield. No noise barriers have been identified so residents are unable to comment as to whether this impact will be reduced. No proposal for alternative accommodation is provided. This is unacceptable and all of the proposed noise mitigation options should be detailed in the EIS so that residents have an opportunity to comment on what is proposed. (Executive Summary xvii)
7. There is no plan to manage traffic on Darley Road proposed in the EIS. This critical arterial road is regularly congested at peak periods. Reference in the EIS to developing a traffic management plan in the future is not acceptable. The detail of what is proposed needs to be contained in the EIS so that residents can assess whether the impact of 170 light and heavy vehicle movements a day in and out of the site can be acceptably managed.

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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 object to the proposal to the Darley Road civil and tunnel site for the reasons set out in this submission.
2. I object because of the unacceptable risk it will create to the safety of our community. Darley Road is a known accident and traffic blackspot and the movements of hundreds of trucks a day will create an unacceptable risk of accidents. On Transport for NSW's own figures, the intersection at the City West Link and James Street is the third most dangerous in the inner west.
3. The EIS permits trucks to access local roads in exceptional circumstances which includes queuing at the site. Given the constraints of the Darley Road site queuing will be the usual situation. The EIS needs to be amended to remove queuing as an exceptional circumstance. The truck movements should properly managed by the contractor so that there is no queuing. This exception will make it easier for contractors to neglect their obligation to monitor and manage truck movements in and out of the site and needs to be removed. The EIS needs to specifically provide that all local streets abutting Darley Road and expressly prohibited truck movements (including parking) on these streets. This should include all streets from the north (James St) to the south (Falls Road), which are near the project footprint.
4. Leichhardt residents were repeatedly told by SMC that the Darley Road site would be operational for three years. The EIS states that it will be operational for 5 years. This creates an unacceptable impact for residents. The works on the site should be restricted to a three-year program as was promised.
5. The EIS states that construction noise levels would exceed the relevant goals without additional mitigation. The additional mitigation is mentioned but not proposed or any detail provided. 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. 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 unlivable during this period. In addition, the planned 170 heavy and light vehicles will considerably worsen the impact of construction noise.
6. The EIS does not even mention the impact of aircraft noise and its cumulative impact. As such, the noise levels identified are misleading. I object to the selection of the Darley Road site because of the unacceptable noise impacts it will have on surrounding homes and businesses.

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Application Number: SSI 7485	Suburb: <i>Rozelle</i>	Postcode <i>2039</i>
Application Name: WestConnex M4-M5 Link	Signature: <i>Holly Gorman</i>	
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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 do not consider so many disruptions of pedestrian and cycle ways to be a 'temporary' impact. Four years in the life of a community is a long time. The EIS acknowledges that there will be more danger in the environment around construction sites. It is a serious matter to deliberately take steps to reduce the safety of a community, especially when as the traffic analysis shows there will be a legacy of traffic congestion even in 2033. A promise of a plan is NOT an answer to those concerned about the impacts.
- The 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.
- 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.
- 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.
- 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.
- There is a higher than average number of shift workers in the Inner West. The EIS acknowledges that even allowing for mitigation measures such as acoustic sheds and noise walls, shift workers will be more vulnerable to impacts of years of construction work and will consequently be at risk of a loss of quality of life, loss of productivity and chronic mental and physical illness.
- The 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

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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 object to the planned acquisition of the Dan Murphys site on Darley Road for the creation of a civil and tunnel works site as it will create unacceptable noise impacts for the community and lead to traffic chaos, along with creating an increased risk of accidents to pedestrians and cycle users.
2. The substation and water treatment plant proposed for Darley Road should be moved to the north end of the site near the City West link so that it is less visible to residents. 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.
3. The EIS permits trucks to access local roads in 'exceptional circumstances', which includes queuing at the site. Given the acknowledged constraints of the Darley Rd site (and based on experience with cars accessing the site for Dan Murphy's), queuing will be the norm and not the exception. The EIS, as pertains to the Darley Road site, needs to be amended to rule out queuing as an exceptional circumstance which allows trucks to use local roads.
4. At the conclusion of the construction period, the Darley Road 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 an increase in the green space for residents and result in a pleasant green environment for pedestrians, rather than a fenced facility. The approval conditions need to mandate that the Darley Rd site is to be preserved as green space or other community purposes at the conclusion of the construction period.
5. No trucks (heavy or light) should be permitted on any streets adjacent to Darley Road identified as NCA 13 (James Street to Falls Street). A blanket prohibition should be in force with respect to any worker vehicles from the construction site parking on these local streets. These homes will already suffer the worst construction impacts and should be spared the further imposition of lack of parking and the additional noise impacts of additional cars on their street. These local streets are not designed to handle heavy vehicle movements. Therefore, any approval conditions need to prohibit outright truck movements (including parking) and worker parking on all local streets adjacent to Darley Road.
6. Any approval conditions and the relevant construction contracts must require that all workers to the Darley Rd site are bussed in or use public transport such as the light rail, with no parking whatsoever permitted on local roads adjacent to the Darley Road site. The site currently provides only 11 car spaces for an estimated 100 workers a day on site. The project cannot be approved on this basis without a strict requirement on workers to use public transport or project provided transport and a prohibition needs to be in place against parking on local streets.

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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 the planned acquisition of the Dan Murphys site on Darley Road for the creation of a civil and tunnel works site.
2. The Darley Road site has many issues which make tunneling at this point an unacceptable risk, including that it is in a flood zone. This proposal will worsen the existing flooding risk. The mitigation suggested in the EIS is not adequate.
3. The EIS states that property damage will occur due to ground movement may occur. The EIS states that 'settlement, induced by tunnel excavation, and groundwater drawdown, may occur in some areas along the tunnel alignment'. The proposed tunnel alignment creates an unacceptable risk of ground movement. We object to the project in its entirety on this basis. The risk of ground movement is lessened where tunnelling is more than 35 metres. However, some tunnelling is at less than 10 metres.
4. The EIS states that 'a preferred noise mitigation option' would be determined during 'detailed design'. This approach deprives residents of any ability to comment on the detailed designs. (Executive Summary xvi)
5. The EIS does not mention the impact of aircraft noise and its cumulative impact. Therefore, noise levels identified in the EIS are misleading. The EIS states there will be at least 10 weeks of severe noise impacts during the time that Dan Murphys is demolished and the road prepared. I object to the selection of the Darley Road site because of the unacceptable noise impacts it will have on surrounding homes and businesses, with at least 36 homes identified as suffering extreme noise interference for this initial 10-week period.
6. The EIS states that all vegetation will be removed on the Darley Road site which includes several mature trees. I object to the removal of these trees which create a visual and noise barrier for residents from the City West Link. If the trees are removed they must be replaced with mature trees as soon as the remediation of the site commences.
7. There is no evidence provided in the EIS that the ventilation outlets will be safe. 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.
8. The proposal for a permanent water treatment plant and substation to the south of the site on Darley Road will prevent direct pedestrian access to the light rail station. It will affect the future uses of the site once the project is completed. The facility is out of step with the area which is comprised of low rise homes and detracts from the visual amenity of the area. This site is a pedestrian hub and will be a visual blight for pedestrians, bike users and the homes that have direct line of sight to the facility. It should not be permitted to be located on this site.

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Name _____ Email _____ Mobile _____

From: Holly Gorman <campaigns@good.do>
Sent: Monday, 16 October 2017 4:56 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 am 21 years old and lived in Rozelle my entire life with my sister & parents. I object to every aspect of what WestCONNex's EIS states. WestCONNex is basically going to threaten my life span with carcinogenic car & truck pollution because it wants to use an old fashioned road system that might save maybe 5 minutes for a few years...then just go back to a massive traffic jam. I am really upset that just for someone to sit in their car for a few less minutes travelling to work, this completely heartless government is willing destroy everything in my family's life. You're putting a giant smoke stack and the tunnel entry & exit right near my house to poison the air I breath. You're putting another giant building called a "sub station" and ventilation facility" right on the corner of my street which is going to make a lot of noise and huge shadows as will the smoke stack. I really don't understand it. Why isn't the government spending all that money on improving our current public

transport & building new, really fast and well functioning public transport to EVERY part of Sydney. You're construction is also going to cause our house to possibly sink under us. Are you going to pay for the damages? We have a stream running under our house. That's why Springside St is named that! What's going to happen with that? Your construction is going to pollute the surrounding water in our harbour. We'll have noise vibration dust like all the poor people in all the other suburbs whose lives you have tortured! I really don't get it?! Who's getting paid a lot of money in the back pocket for the dumbest, most destructive "project" that will have the most devastating impact on me, my family, my friends and for ALL the people in the rest of Sydney that you're forcing upon us.

NSW Planning should recommend a halt to the planning process and an independent review of WestConnex before more billions are spent and more residents' lives are damaged. Residents all over Sydney, experts, Councillors and even potential investors have all queried the information supplied by the Sydney Motorway Corporation and NSW Roads and Maritime Services. In this situation, it would be unprofessional of NSW Planning to rubber stamp this inadequate document.

The EIS states 'the detail of the design and construction approach is indicative only based on a concept design and is subject to detailed design and construction planning to be undertaken by the successful contractors.' The community will have no opportunity to comment on the Preferred Infrastructure Report which forms the basis of the approval conditions. Key decisions have been left open in this EIS. Not to allow consultation on the final choice of construction sites would further compromise an already inadequate consultation process.

SMC was required to consider alternatives. This section in the EIS is extremely superficial and fails to come to grips with debates in the field of transport planning. The City of Sydney came up with a well thought out alternative plan and this has been ignored in the EIS. The SMC should be required to engage with this plan and to respond to it. Any responsible system of planning governance would require that.

I completely reject the notion that unfiltered pollution stacks should be built anywhere in Sydney, let alone three or four in a single area. I am particularly concerned that schools would be near such unfiltered stacks. NSW RMS is currently reviewing this policy. A draft of this review should be published for public comment before this planning process is completed

With four unfiltered emissions stacks in Rozelle, two in Haberfield (one each for the M4East and New M5) and two in St Peters, along with a large number of exit portals, residents of these areas will suffer greatly from direct exposure to poisonous diesel particulates.

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

I am also very concerned about the impact of WestConnex on that residents and workers living near local roads which become even more congested as a result of WestConnex. There is research evidence that it is dangerous to live close to congested roads. I reject an approach to transport planning which allows a government authority to approve a project knowing that it will place some residents at increased risk of life threatening impacts.

The noise and air quality studies are completely dependent on the accuracy of the traffic analysis and assumptions. If the traffic analysis is flawed, so too are the air and noise studies and local road traffic impacts. City of Sydney experts and other academic experts have already rejected the traffic analysis on which WestConnex bases its case. Only last week Citi financial analysts in a report to their large investors were of the view that the traffic predictions contained were unlikely to be achievable. They are arguing that due to toll avoidance and the opening of Badgery's Creek airport, the actual traffic figures will be lower than predicted. In this situation, it would be negligent for NSW Planning to approve this project.

I object to the indicative design for the Rozelle Interchange. Sydney Motorway Corporation has not been able to identify any other similar underground interchange project anywhere in the world or find a construction company to build it. This EIS should be rejected because it would be absurd to approve such a design concept without evidence that it could be constructed. It would also be absurd to place conditions on a project for which even the most basic details are not known.

I also object to a project which will add to congestion on local roads in the Alexandria, Newtown, Enmore and Erskineville areas. The EIS does not adequately model the impact on local roads of Stage 3. I am concerned that the final result will be that King Street will become a 24 hour clearway, which would kill a vibrant Sydney area.

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 inadequate traffic analysis shows that even if this tollway and all other proposed tollways are completed, the St Peters Interchange and Frederick Street in Ashfield will be considerably more congested in 2033 if the project goes ahead.

I am also concerned that the traffic figures relied upon in the EIS are simply not reliable. AECOM, the company responsible for this EIS, has a well-documented record of wrongly predicting traffic. Already there are reports that the traffic for all stages of WestConnex has been overestimated and construction costs underestimated. (SMH 'Pressure builds on government to sweeten WestConnex sale' 5/10/2017)

Reductions of volumes of traffic on Parramatta Rd, King Georges Road or the existing M5 are asserted but the model which projects these effects is not provided for scrutiny or independent assessment. The model's margin for error is not stated. The rest of the benefits all depend on the asserted traffic reductions generating improved travel times and better bus services or freight movement etc. So far the experience of the growth of traffic on Parramatta Rd in response to the re-imposition of tolls on the widened section of the M4 gives us leave to doubt these touted benefits.

The Social and Economic Impacts report refers to the socio-economic impact of tolls on Sydney communities. Toll avoidance would be a major impact of this project. The investigation and analysis of the impact of tolls is not adequate and underestimates the social, economic and health burden it will place on residents for decades to come.

There is reference in the EIS to the WestConnex Road Traffic Model version 2.3 (WRTM v2.3), a strategic traffic model that has been used in the traffic analysis. There is insufficient explanation of the nature of the model, where it can be accessed and what function it plays in the analysis. Since so much else in the EIS including noise and air quality predictions are dependent on this forecasting, the lack of transparency makes it difficult for the EIS to be subject to independent critique.

When measuring the impacts in the EIS, it is important to bear in mind the mismanagement of the project to date and residents have little confidence that any measures set out in the approval document will, in fact, be complied with. During 2017 residents in St Peters have been subject to appalling odours which have damaged the health of some community members and damaged the quality of life of many more. SMC has failed to comply with the environmental protection licence that it was granted as part of previous approvals. NSW Planning has shown that it does not have the powers to enforce compliance. In this situation conditions are meaningless. I am appalled that there is a significant risk that these odours would continue if Stage 3 is approved. I would strongly object to the NSW EPA granting a license for this project on the basis of this application and with no clear plan for how contamination would be controlled. No community should be treated in this manner.

I am also concerned that Haberfield and Ashfield residents are being given the apparent choice of two construction plans, Option A or Option B, both of which will have severe impacts on the community. In fact the EIS hints at other options that have not been fully disclosed.

It was promised, and was a condition of the M4 East approval that in 2019, all Haberfield and Ashfield above ground WestConnex construction sites were to have been dismantled, as well the Urban Design and Landscape Plan (UDLP) completed and Legacy Project 'surplus lands and property' delivered back to the community. These promises were still being reiterated in early 2017, when there was community consultation on how surplus land would be restored to the community in 2019. It is a matter of grave concern that these promises are now been ignored as if they did not happen. NSW Planning should investigate this situation.

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

The EIS identifies a significant risk of leaks of contaminated water into Rozelle Bay and Alexandria Canal. Such risks to health of Sydney's waterways is not acceptable to me. The Sydney Motorway Corporation through its conduct at St Peters has shown that it cannot be trusted to manage contamination risks. I am completely opposed to the residents of St Peters being exposed to a high risk of being impacted by gases from exposed landfill for a further three years. The NSW EPA should not grant any further licenses that would allow such events to occur.

I object to the EIS on the grounds that it fails the Secretary's requirement for "meaningful" consultation. Hundreds of submissions on the concept design, including a major one from the Inner West Council, were ignored. Consultation is not the provision of glossy brochures, light on detail, which minimise the negative aspects of a project and state that ever impact will be managed by a 'plan'.

The heritage report ignores potential impacts on hundreds of homes in Newtown and Rozelle which are part of Sydney's valued history. This report is incomplete and should not be accepted. Given that the EIS acknowledges that buildings can be damaged by tunnelling, there should have been a full report on all heritage buildings within the tunnel project boundaries.

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

Yours sincerely, Holly Gorman 28 Callan St, Rozelle NSW 2039, Australia

This email was sent by Holly Gorman 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 Holly provided an email address (hollyfg@gmail.com) which we included in the REPLY-TO field.

Please reply to Holly Gorman at hollyfg@gmail.com.

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

Attention Director
 Infrastructure Projects, Planning Services
 Department of Planning and Environment
 Application number SSI 7485
 GPO Box 39, Sydney, NSW, 2001

To Whom It May Concern,

We are deeply concerned by findings outlined in the Westconnex M4-M5 Link (the "Project") Environmental Impact Statement ("EIS").

In particular, the current Project design results in multiple tunnels 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 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.

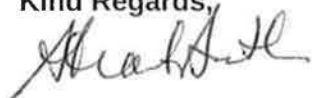
The EIS states that the above tunnels will result in the following impacts to our Neighbourhood:

- 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.**

Kind Regards,



10 Cheltenham Street
 Rozelle, NSW 2039

10 October 2017

Planning Services
Dept of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Objections to WestConnex.

Congratulations to Mayor Darcy Byrne on election and on the well run Inner West Council public meeting on Wed 4Oct 2017 regarding the WestConnex.

My wife and I are both submitting objections. We both share many of the objections distributed at the meeting. And as per the following below.

Primarily I continue to be stumped as to the basic purpose of the WestConnex? Especially in view of its many last minute changes just prior to staged constructions. I gather it will cater for 45,000 more vehicles. Are those from new western suburbs growths or for other reasons? But why direct more western vehicles to the Airport?

And why the complex Rozelle tunnels – as distinct from say just an Anzac Bridge connect? What's the sense turning it back to Victoria Rd and a Balmain tunnel to the north suburbs?

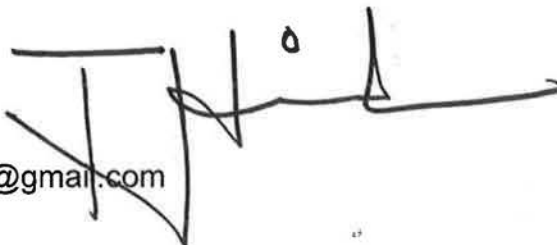
And the sense at St Peters turning south to the M5 and to the Princes H'way etc? Proposing the St Peters connections nearer the Airport seems less disruptive. But why is the WestConnex going to the Airport anyway ?

Why is it instead not "reverse directed" to access and stimulate the new 2nd airport and the Parramatta centre and not increase superfluous city bound traffic ? !

The above questions are in fact major objections to the current WestConnex.

It seems likely the NSW Govt will ignore the many comments made at the meeting including the questions and objections above. Hence I believe the best suggestions were for the IWC to join with Sydney City Council and especially with many western councils – now against the huge tolls – to force the NSW Govt to listen so as to make more sense of the remainder of the WestConnex ! And/or legal actions perhaps ?

Theo J. Hirsch
44 Glassop St.
BALMAIN NSW 2041
9810 1136 tedhirsch@gmail.com



SUBMISSION: WESTCONNEX M4-M5 LINK

001005

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 devastation on a quiet federation suburb where we have worked for years @ maintaining a Heritage feel. There is complete ignorance about the impact of this monstrosity.

Yours sincerely,

B. Haldane

DATE: 15/10/17

NAME: Sharon Haldane

ADDRESS: 14 Waratah St
Haberfield.

Email: haldane37@opnsnet.com.au

Phone: 0434 000 873 .au

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

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

Feedback on EIS for WestConnex M4-M5 Link (Application Number SSI 16 7485)

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

Ventilation: Air pollution

WestConnex proposes unfiltered tunnel ventilation outlets of unknown heights: one approximately 250m northwest and three others approximately 700m south of the School. At present there is insufficient detail or evidence of analysis to determine the impact to the children at the School. Please provide the following:

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

Air pollution, noise and vibration during construction

Four to five years of construction works is proposed, including work as close to the School as Wellington Street, constructing the Iron Cove Link tunnel entrance and exit on Victoria Road approximately 250m from the School, with tunnelling work (and activities to support tunnelling) will be 24 hours a day, seven days a week.

I am very concerned that this will mean our children will be badly affected in some way by poor air quality, noise and vibration during 24/7 construction for four to five years - potentially the rest of their entire primary school education - during the entire time that our children are present on school grounds or at home.

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

- Limit negative impacts on our children's abilities to learn and play during these times,
- Eliminate noise at pre-school infants' nap-times and during tests at the School
- Minimise the impact of construction children's physical health, stress levels, and the impact on those with pre-existing respiratory conditions,
- Ensure children living within 500m of construction are able to receive full nights of sleep, as lack of sleep leads to tiredness and proven difficulty learning.

Soil pollution in construction

Please provide specific plans that ensure that construction will not cause the disturbance of lead and other toxic industrial pollutants known to be distributed in the soil throughout Rozelle and specific plans to eliminate the spread of soil contaminants throughout the surrounding area, including the School.

Safety and traffic management during construction and operation

At present there is insufficient traffic management detail to ensure the safety to the children at the School both during construction and operation. Please provide the following:

- A traffic plan concerning all roads and footpaths within 500m of the construction area, including but not limited to Victoria Road, Wellington Street, Merton Street and Darling Street which minimises risks to safety for road and footpath users, including buses, pedestrians and cyclists during construction due to temporary road arrangements or the close proximity of construction activities to normal traffic,
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Other major concerns I have include:

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

Yours Sincerely,

Signature:



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

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

Name:

Holly Symons

Address:

65-69 Nelson St Rozelle

Email:

HollySymons123@gmail.com

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

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

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Signature: 

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Name: *Zoe Karpin*

Address: *39 Red Lion St Rozelle*

Email:

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

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

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Name:

ROGER PICKUP

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Email:

syonpark@hotmail.com

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

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

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

Yours Sincerely,

Signature:

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

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

Name: *Melissa Maffeo*

Address: *23 Gordon St, Rozelle*

Email: *mattaramelisa@gmail.com*

From:
Sent:
To:
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 should 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.

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.

I 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." I would add that it shortchanges all of those who will depend on transport in Sydney in the future.

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.

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.

I am also concerned that the traffic figures relied upon in the EIS are simply not reliable. AECOM, the company responsible for this EIS, has a well-documented record of wrongly predicting traffic. Already there are reports that the traffic for all stages of WestConnex has been overestimated and construction costs underestimated. (SMH 'Pressure builds on government to sweeten WestConnex sale' 5/10/2017)

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 everyone 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.

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 Lk), 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 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]

at [REDACTED]

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

From: [REDACTED]
Sent: Sun, 15 Oct 2017 13:08:13 +0000
To: [REDACTED]
Subject: FW: Submission Details for Joy Brookes (object)

From: system@accelo.com On Behalf Of Joy Brookes
Sent: Sunday, 15 October 2017 10:05:08 PM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for Joy Brookes (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Joy Brookes
 Email: Jkbaus@yahoo.com.au

Address:

[REDACTED]

Alexandria, NSW
 2015

Content:

I strongly object to the proposal.

As demonstrated by the EIS, the project does not make sense or provide value for the tax payer dollars. The EIS admits that it can't properly model traffic numbers.

With the numbers it does project it admits that there will be no significant improvement in traffic flow/ travel times at peak times.

It fails to properly consider alternative proposals eg a proposal to improve journeys using public and road transport according to commercial and individual public needs.

It does not satisfactorily deal with impact on surrounding roads and streets.

I believe this proposal is not sound. It does not meet the SEARs requirements.

Accordingly, I believe that the Department cannot approve this EIS unless it wishes to betray public trust and confidence in the process.

[REDACTED]
 Submission: Online Submission from Joy Brookes (object)

https://majorprojects.accelo.com/?action=view_activity&id=227806

Submission for Job: #7485 WestConnex M4-M5 Link

https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

From: [REDACTED]
Sent: Sun, 15 Oct 2017 13:13:34 +0000
To: [REDACTED]
Subject: FW: Submission Details for Ian Woolf (object)

From: system@acelo.com On Behalf Of Ian Woolf
Sent: Monday, 16 October 2017 12:10:05 AM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for Ian Woolf (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Ian Woolf
 [REDACTED]

Address:
 [REDACTED]

Ashfield, NSW
 2131

Content:

Please take public transport into account in your planning. All the bus stops from Ashfield Park to Bland St have been removed, and now I'm told Westconnex are acquiring the block that includes the next bus stop, between Bland St and Alt St, which will mean losing yet another bus stop. How is anyone meant to actually use the buses without stops?

If the bus stop between Bland and Alt ST is going to be removed due acquisition by WertConnex, will we also lose the bus stop going the other way on the opposite side of the road? The bus stop renamed Yasmir training centre without any consultation or notification, also has had its listing in the timetable moved from its geographical order to alphabetical order, to everyone's confusion. I use both of these bus stops regularly, am I now to walk half an hour or more to use the buses as WerstConnex eats all my bus stops? What happened to the promises of more buses on Parramatta Rd - will they just whizz past without stopping for passengers? What is the point?

It is unacceptable for the smoke stacks to be unfiltered. Scrubbing smoke stacks is standard industrial technology - its a solved problem. IN addition to the high percentage of people with respiratory illnesses like asthma, there are a large concentration of child care centres and nursing homes in Summer Hill and Ashfield which are full of young children and elderly people who will be hurt the most by unfiltered pollution from the smokestacks.

Please consider provisions for pedestrians who need to walk between bus stops, as well as around the suburbs we live in. EVERYONE is a pedestrian sometimes. There are no spaces for people to walk during construction, and the pedestrian bridge across Parramatta Road on the corner of Bland St, has had its stairs closed. Is the bridge being removed? Its a very long wait to cross a very busy Parramatta Rd intersection, and dangerous despite the lights, without the pedestrian bridge.

[REDACTED]
Submission: Online Submission from Ian Woolf (object)

https://majorprojects.accelo.com/?action=view_activity&id=227850

Submission for Job: #7485 WestConnex M4-M5 Link

https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

From: [REDACTED]
Sent: Sun, 15 Oct 2017 13:26:16 +0000
To: [REDACTED]
Subject: FW: Submission Details for Paul Rupil (object)
Attachments: 227848_M4-M5 EIS Submission_ Paul Rupil_2017Oct16_0007.pdf

From: system@accelo.com On Behalf Of Paul Rupil
Sent: Monday, 16 October 2017 12:08:11 AM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for Paul Rupil (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Paul Rupil
[REDACTED]

Address:
[REDACTED]

Haberfield, NSW
2045

Content:
 See attached for full submission.

- Option B in Haberfield is unacceptable
- project should go ahead and soon\
- m4 east air quality monitoring should be extended
- project should present more advantages to locals - traffic calming on Parramatta Rd, heritage protection assurance
- the mainline should be straightened

[REDACTED]
 Submission: Online Submission from Paul Rupil (object)
https://majorprojects.accelo.com/?action=view_activity&id=227848

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

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

Submission/Response to EIS for M4-M5 (Final Stage) of Westconnex
SSI7485

From
Paul Rupil
29 Dalhousie St Haberfield 2045
paul.rupil@gmail.com
0402087251

Firstly, I concur with many in my community and in particular, members of the Haberfield Association, in that the construction plans for this project should follow the plans presented as part of the M4 East project.

The best summary I have read of the objection is by Victor Storm and states:

I request the Department of Planning not approve the application because significant and relevant information has been omitted from Chapter 4 of the M4-M5 EIS, particularly in relation to Haberfield Option A and B. These omissions make Chapter 4 and the entire EIS incomplete and not ready for exhibition, assessment, or approval.

- *False and misleading or omitted information brings into question the validity of the entire M4-M5 EIS. All chapters, appendices and annexures of EIS rely upon the accuracy of project development background information as presented in Chapter 4. If Chapter 4 is inaccurate and inadequate, then so is the rest of the EIS.*
- *Specifically, what is presented in the M4-M5 EIS is false and misleading due to **no mention or consideration of what occurred during the M4 East exhibition, assessment and approval process**, - and how this background information and WestConnex project knowledge relates to the current M4-M5 application.*
- *What was promised to the community during the M4 East Concept phase (2013-14) and **M4 East EIS exhibition phase in (2015-16)**, was **that there would be no above ground construction sites in Haberfield and Ashfield after 2019** – except if the M4-M5 were to be approved. If the M4-5 were approved, then only limited construction work would be required to fit out of the M4-M5 ventilation stack, as well as use of the M4-M5 entry and entry ramps along Wattle St, between Parramatta Rd and Ramsay St, Haberfield.*
- *When the WestConnex M4 East project was approved in February 2016, the M4-M5 (Stage 3) ventilation facility and exhaust chimney, the M4-M5 'blind portal' entry and entry surface ramps, and the M4-M5 mainline tunnel stubs were also designed and included to be constructed as part of the M4 East project.*

- *The M4-M5 exhaust stack is currently being built onsite as part of the M4 East Parramatta Rd Ventilation Facility (PRVF) opposite Bunnings, the M4-M5 entry and exit surface ramps are currently being built along Wattle St, Haberfield between Parramatta Rd and Ramsay St, Haberfield, and the M4-M5 mainline tunnel stubs are being tunnelled and will end deep underground around 142-144 Alt St, Haberfield.*
- *What was promised at the time of M4 East EIS exhibition and approval was that if the M4-M5 were to be approved (as predicted by SMC/WDA), there would be no need any above ground construction sites in Haberfield and Ashfield. This promise was repeated and reiterated from 2013 until recently, and was said to be being both reasonable and technically feasible.*
- *This promise was also actively used, in 2015/2016, to justify the significantly changed design and expansion of the Wattle St interchange in the M4East EIS, from what was presented to the community during the M4 East Concept Plan information sessions in 2013/2014.*
- *This promise of no M4-M5 above ground construction sites in Haberfield or Ashfield has subsequently been used as the basis for asking for community and resident 'patience' for the promised 'temporary' duration of WestConnex M4 East construction activity. This M4East construction is currently causing significant and adverse health, well-being, social and business impacts in Haberfield and Ashfield.*
- *It was promised, and was a condition of the M4 East approval that in 2019, all Haberfield and Ashfield above ground WestConnex construction sites were to have been dismantled, as well the Urban Design and Landscape Plan (UDLP) completed and Legacy Project 'surplus lands and property' delivered back to the community. These promises were still being reiterated in early 2017, when there was community consultation on how surplus land would be restored to the community in 2019.*

I object that the M4-M5 project proposes to deny and renege on what was originally promised to the Haberfield and Ashfield community in 2019, and which will now result in a total of 8 years, or more, of construction being imposed upon the residents and businesses.

This is scarcely a temporary proposal that residents should be forced to endure! Whilst the proposals made in the current M4-5 EIS are feasible, they are unreasonable because of the sustained and unacceptable impact on the lives of Haberfield/Ashfield residents. A decade long intrusion and disruption into the everyday life of people from 2013-2023 is unreasonable.

I specifically object that no feasible or reasonable alternative to 8 years of construction is being presented or considered in Chapter 4, or elsewhere in the M4-M5 EIS.

It is highly unacceptable that so many residents in the vicinity of the Bland St and Parramatta Rd intersection will need to ensure many more years of noise and dust following the conclusion of work east of Bland St building the M4 East portals. The Noise and Vibration working paper (Volume 2D Appendix) clearly states the number of receptors will be far greater under option B.

It is also unacceptable that spoil removal trucks will need to use surface roads where an underground alternative exists. Option B requires significant spoil haulage movements in the Ashfield area including in the area around Ashfield Park and Ashfield Public School.

The impact of this construction site to families with children (including mine) at Haberfield Public School is unacceptable. Noise and dust is a problem that should end with the completion of the M4 East. Traffic in the school entrance area must be calmed and sources of traffic should be kept away. Option B will ensure some children will spend their entire 7 years of schooling with the noise, dust and traffic of the Westconnex project. There are around 600 students at this school. It's student catchment surrounds the Option B proposed site (as well as the current work on the M4 East portals, and the Wattle St works).

My larger objection is to Option B. Option A has been a noisy area for many years, and although not ideal, Option A represents far fewer impacts on receptors. Should Option B be pursued, it is vital the "upgraded acoustic shed" referred to in the noise report is installed.

Overall, my preference is not to stall this project further. The traffic impact on routes from the M4 East to the city will only be more congested once the M4 East opens, until the M4-M5 link is complete with a link to Anzac Bridge.

Further requested action

It is also unfortunate the Camperdown portals have been removed. This has a clear result as shown in traffic flow projections of increasing the load on Parramatta Road between Haberfield and the city. It is strongly recommended conditions of approval include either traffic **calming on Parramatta Road** after project completion and/or **congestion charges** for through traffic i.e. traffic passing from Haberfield through to Ultimo.

The Westconnex project and City-West Link road changes made prior have left Haberfield heavily altered. This is a suburb fighting to preserve its unique heritage. **Haberfield should be immediately assessed for State Heritage Register protection.** It would be an acceptable and pleasing outcome for many residents affected by this project if the listing of the suburb was an outcome of the completion (or approval) of the final Westconnect stage.

As a member of the AQCCC for the M4 East project, and having actively negotiated with the Haberfield Public School principal and P&C to locate the **air quality monitoring station**

within the school grounds, I would strongly urge the approval conditional on the monitoring **remaining in place until the M4-M5 is complete and for two years after**. Furthermore I would suggest monitoring results are made public in real time and a suitable representative is available to report on the seriousness of any readings well above the predicted air quality as modeled by Pacific Environment on receptor 35 (Haberfield Public School).

Finally I make one observation of the underground mainline path chosen between the interchange at Wattle Street Haberfield and the interchange to Anzac Bridge. **The mainline route curves to the north and back south for seemingly no reason**. Surely it would be cheaper to construct and drive through if it were straight. This seems to be a relic of previous design decisions and perhaps remains due to planning already performed, but nevertheless seems an unnecessary burden for drivers who will always find it safer to see far ahead.

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: FW: Submission Details
Attachments: 227818_MJ objection to proposed Westconnex M4-M5
Link_2017Oct15_2239.pdf

From: system@accelo.com On Behalf Of [REDACTED]
Sent: Sunday, 15 October 2017 10:40:12 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [REDACTED]
Subject: Submission Details

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Name: [REDACTED]
Email: [REDACTED]

Address:
[REDACTED]
[REDACTED]

Content:
Please see my submission uploaded

IP Address: - [REDACTED]
Submission: Online Submission from [REDACTED] (object)
https://majorprojects.accelo.com/?action=view_activity&id=227818

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

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

To:

NSW Department of Planning and Environment

Re: Objections to WestConnex M4-M5 Link (Application Number SSI 16_7485)

I object to the design, construction and operation of the proposed WestConnex M4-M5 Link as it actively supports unsustainable vehicular transport

The major reasons for my objections are numbered and outlined below.

1. Very little or no consideration given to comments on the Concept Design

Wishing to be involved in and respond to the proposal I read and provided feedback on the Concept Design.

However, less than 2 weeks after the exhibition of the Concept Design closed the EIS was released. I cannot see how my (and others') comments could have possibly been considered and addressed in the proposal before the EIS was finalised. This is actually a disgrace on the promoted approach to consultation claimed by the Roads and Maritime Service on the proposal.

2. Actively supports the continued worsening of climate change

Transport modes intended for the proposal are primarily fossil based fuels. These fuels are a major producer of greenhouse gases. There is a stated intention through the Paris Agreement that Australians will reduce greenhouse gas emissions, however, this proposed project actually works against this agreement.

3. The lack of integration with transport and economic planning in and around Sydney.

The NSW Government "A Plan for Growing Sydney" (interim provided on the NSW Planning and Environment website) identifies Greater Parramatta as a Priority Growth Area. Provided information (for example in community brochure) states:

"Our Interim Plan outlines how we're planning for a connected, vibrant city with more jobs, homes, and essential services over the next 20 years. It provides a framework to guide future redevelopment and identifies the infrastructure needed for continued growth."

However, the proposed M4-M5 Link is promoted as a link between Parramatta and Sydney CBD for employment and business. There is a focus on transport from Parramatta to the Sydney CBD and other locations.

This demonstrates a lack of integration of the intended NSW Government support of employment and business actually in Parramatta.

4. Integration with proposed Western Harbour Tunnel and cumulative impacts

The EIS Design shows that tunnel stubs will be constructed for the proposed Western Harbour Tunnel. However the actual integration with the M4-M5 Link and Western Harbour Tunnel is not included for future construction methodology and operational use.

This must be incorporated into the EIS, especially as construction on the Western Harbour Tunnel will effectively commence with the M4-M5 Link.

5. Proposing an old-fashioned approach to transport and traffic management

Designing and developing road-based transport has been the major approach for 60 years. It is now widely recognised that this approach has not been effective. The proposal itself is an example: a road based transport system is not working optimally, so build a new or expand an existing one. This dated approach will worsen the transport and traffic management system now and into the future.

This needs to be avoided for the sustainability of people and the wider environment by reducing the use of fossil fuels, air pollution and associated impacts such as climate change.

Our resources and budget should be spent on further developing extensive public transport.

6. Actually increasing the existing poor traffic performance

The proposed discharge of the traffic into the CBD occurs at the Anzac Bridge. This bridge is currently very congested throughout the day. Promotion and addition of even more traffic will slow travel time further over time.

7. Decreasing the need for further beneficial public transport

In simple terms, promoting and providing for the use of private vehicles will decrease the demand for public transport. The EIS does not provide any adequate comparison with the benefits of public transport for worthwhile and holistic assessment.

8. Operational Ventilation: Air pollution

Roads and Maritime Services propose unfiltered tunnel ventilation stacks. These emissions lead to adverse health effects. My particular concern is the health impact on children.

I support that the stacks will be filtered at a minimum for carbon monoxide, nitrogen dioxide and particulates (PM 10 - PM 2.5 particles).

9. Air pollution, noise and vibration during construction – through out the area and specifically Rozelle Public School

Four to five years of construction works is proposed. Specifically in the Rozelle area, this includes constructing the tunnel entrance and exit on Victoria Road approximately 250m from the Rozelle Public School, continuing the tunnelling and all associated work including: demolition, storing and moving rock, haulage by trucks and the workforce travelling, parking and more.

Above-ground work is proposed to be undertaken 7am–6pm Mondays to Fridays and 8am-1pm on Saturdays. Tunnelling work (and activities to support tunnelling) will be 24 hours a day, seven days a week.

Page 10- 108 in the EIS states that:

“One educational facility in this area would be subject to worst case exceedances of 11 to 20 dBA above NML during the higher noise generating activities. This receiver is Rozelle Public School, located at 663 Darling Street, Rozelle (within NCA31).”

This demonstrates how sensitive the School is to noise and other construction impacts. For children at Rozelle Public School this is potentially for the rest of or their entire primary school education.

10. Soil pollution in construction

Construction could cause the disturbance of lead and other toxic industrial pollutants known to be distributed in the soil throughout Rozelle and these could be spread throughout the surrounding area.

While the management of existing contamination and future potential contamination is considered in Chapters 15 and 16 of the EIS, it is not clear on how the potential impacts would be identified and managed.

11. Safety and traffic management during construction and operation

Constructing and using the M4-M5 Link will endanger our community's safety and transport in many ways. These include:

- Increased safety risks for road users, including buses, pedestrians and cyclists during construction due to temporary road arrangements or the close proximity of construction activities to normal traffic
- Road closures and heavy construction vehicles making it very difficult for parents and small children to walk to School safely
- Rat runs and increased traffic in side streets by drivers changing their routes to avoid tolls
- Negative impacts on bus routes and stops on Victoria Road
- Negative impacts on cycle paths on Victoria Road.

For traffic movements during construction Table 6.22 of the EIS states:

C5 Rozelle civil and tunnel site, 517 heavy vehicles and 350 light vehicles per day

C6 The Crescent civil site, 10 heavy and 10 light vehicles per day

C7 Victoria Road civil site, 42 heavy and 140 light vehicles per day

C8 Iron Cove Link civil site, 42 heavy and 140 light vehicles per day

The spoil haulage routes for C7 Victoria Road civil site and C8 Iron Cove Link civil site are not given in the EIS, while all other haulage routes are shown in Figures 6-26 to 6-27. As the sites C7 and C8 are closest to the Rozelle Public School these proposed haulage routes need to be properly included in the EIS for assessment.

12. Potential changes to the design of the project if approval to proceed is given

The proposed design shown in the EIS is not necessarily the final design and changes can be made by the chosen contractors in the final design. This creates a high risk that if approval is given for the project changes are made that cannot be considered by the public.

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: FW: Submission Details

From: system@acelo.com On Behalf Of [REDACTED]
Sent: Monday, 16 October 2017 1:52:04 AM (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:

To Whom It May Concern,

The WestConnex Project had gone ahead without sufficient consultation. It's moving ahead with tremendous speed and a lack of care of local residents who have had to lose homes and businesses. It's going to be a blight on the face and infrastructure of Sydney. It will make Sydney transport an embarrassment in the eyes of the world.

The main problem with it is the focus on cars and road vehicles instead of rail and public transport. Focusing on cars means that even if there is an improvement in the short term, there is less scope for improvement in transport options in the future. Relying on cars for transport is not an efficient way of moving people. London is building more tunnels for trains. So is NYC. They are not building underground motorways! What happens when there is an accident underground? It's just going to cause crazy congestion and blockage. How do you remove an accident from a tunnel kilometres underground?

So many people have said that Sydney is no longer the Sydney that they know. It has changed in the last 5-10 years to an unfriendly and ugly city. That is very sad to hear. And despite that, no one within the planning department is "hearing" this. I think that people will gladly give up their home if they feel that a project is worthwhile and will move with the times. Unfortunately WestConnex is not one of these projects. It's archaic and will set the city back at least 50 years. How is that a project worth supporting. Unfortunately, no one wants to hear this and peoples opinions are being pushed aside all for what? 4000 jobs? NOBODY anywhere is building motorways under their beloved city!!!

I urge the planning to department to just stop and listen. Just stop and consultate with your community a bit more. Not just locally but internationally. Get more opinions! This is a disaster and i'm afraid it's a disaster that would be very hard to undo and reverse. All the tons of concrete will be difficult to unpour. All those houses you tear down will be no more. All the tolls you collect will be meaningless. All the small businesses you push out of local communities will be death of the communities themselves. If you

remove Swadlings Timber and Hardware from Rozelle, where are the local tradies going to go? You will be forcing them to use your WestConnex just to get a sheet of plywood!

I implore you. Please reconsider your vision. Its not the future. If that's the future you see, then it's the wrong future for Sydney.

IP Address:

[REDACTED]

Submission: Online Submission from [REDACTED] (object)

https://majorprojects.accelo.com/?action=view_activity&id=227854

Submission for Job: #7485 WestConnex M4-M5 Link

https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: FW: Submission Details
Attachments: 227860_Westconnex 2 [REDACTED].pdf

From: system@accelo.com On Behalf Of [REDACTED]
Sent: Monday, 16 October 2017 2:25:19 AM (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]
[REDACTED]

Content:
see attached

IP Address: [REDACTED]
Submission: Online Submission from [REDACTED] (object)
https://majorprojects.accelo.com/?action=view_activity&id=227860

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

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

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: [REDACTED]
	Address: [REDACTED]
Application Number: SSI 7485	Suburb: [REDACTED] Postcode: [REDACTED]
Application Name: WestConnex M4-M5 Link	Signature: [REDACTED]
<p style="text-align: center;"> <i>Please [REDACTED] Exclude (circle) my personal information when publishing this submission to your website</i> Declaration : I HAVE NOT 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, and request the Minister reject the application.

Inner West Subsurface Interchange:

The proposed Inner West Subsurface Interchange, planned as part of Stage 1 (Vol 2B Appendix E p 1), linking the 2 mainline tunnels with the Rozelle Interchange and the Iron Cove link is of serious concern, there has been little information about the Inner West Interchange, its construction or which streets it would affect.

The EIS states the Inner West Interchange would be under 3 suburbs - Lilyfield, Annandale and Leichhardt – so clearly it would cover a very extensive area (see map in EIS Vol 1A Chap 5 Part 1 p11) with drilling and danger of subsidence affecting hundreds of homes.

Four intersecting tunnels, each 8 lanes wide, with four toll locations, would converge under Mayes, Young, Ferris, Moore, Catherine, Hill, John, Emma, Styles, Ilka, Paling, Piper and the many other surrounding streets (Vol 1A Chap 5 Pt 1 p 11).

The construction of the Interchange, with its intersecting tunnels at varying depths in a spaghetti junction network, would exacerbate ground settlement and vibrations and cause homes, most of which are Federation or earlier above the Interchange to be seriously impacted.

Air quality – exhaust emissions:

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.

In particular I object to the Darley Road Civil and Tunnel Construction site because of the impact it will have on health.

Many school children alight from the light rail at this stop to get to Sydney Secondary College Leichhardt Campus. Many school children board the light rail at this stop to get to the Blackwattle Bay campus, St Scholastica's and other schools along the light rail. Many school children who attend Orange Grove Public School, Lilyfield cross the City West Link here.

These pedestrians and school children will be forced to inhale diesel fumes containing dangerous fine particulate matter day in, day out, for years.

No other WestConnex Civil and Tunnel Construction site brings pedestrians and school children directly into daily contact spoil trucks and their dangerous diesel emissions.

The Darley Road Civil and Tunnel Construction site in Leichhardt should not be allowed to proceed because of the health impacts from diesel exhaust.

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: FW: Submission Details
Attachments: 227862_Westconnex 3 [REDACTED]_2017Oct16_0227.pdf

From: system@accelo.com On Behalf Of [REDACTED]
Sent: Monday, 16 October 2017 2:28:10 AM (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:
see attached

IP Address: [REDACTED]
Submission: Online Submission from [REDACTED] (object)
https://majorprojects.accelo.com/?action=view_activity&id=227862

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

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

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

Traffic and transport - spoil haulage routes:

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 route identification and scheduling of transport movements, particularly outside standard construction hours.

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.

From: [REDACTED] <campaigns@good.do>
Sent: Monday, 16 October 2017 1:17 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 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.

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]

_____ 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] at [REDACTED]

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

From: [REDACTED]
Sent: Sun, 15 Oct 2017 20:08:11 +0000
To: [REDACTED]
Subject: FW: Submission Details for Peter Brittliff (object)

From: system@accelo.com On Behalf Of Peter Brittliff
Sent: Monday, 16 October 2017 7:08:01 AM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for Peter Brittliff (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Peter Brittliff
[REDACTED]

Address:
[REDACTED]

ASHFIELD, NSW
2131

Content:

I'm writing to to raise strong objections and concerns around this project namely the impact upon my young family who live and attend Haberfield State School and the Infants home -- immediately beside the construction and unfiltered exhaust stack.

My major concerns are:

Air-quality during construction with increased above-ground diesel truck movements of poison (dirt) extracted from the tunnel.

Air-quality post construction due to unfiltered airstacks and increased traffic on Parramatta road due to toll-avoidance.

Traffic & Parking increased considerably putting additional cars and trucks on the roads where my children walk to school. We also expect our street (Ilford) to be blocked due to trucks and worker vehicles accessing the site.

I'm also frustrated by the lack of certainty around 'indicative' aspects of the EIS the governance around this and the previous stages has and continues to be highly questionable.

[REDACTED]
 Submission: Online Submission from Peter Brittliff (object)
https://majorprojects.accelo.com/?action=view_activity&id=227881

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

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

From: [REDACTED]
Sent: Sun, 15 Oct 2017 20:22:16 +0000
To: [REDACTED]
Subject: FW: Submission Details for James Monroe (object)

From: system@acelo.com On Behalf Of James Monroe
Sent: Monday, 16 October 2017 7:22:06 AM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for James Monroe (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: James Monroe
 [REDACTED]

Address:
 [REDACTED]

Balmain, NSW
 2041

Content:

The exhibited proposal for exhaust stacks near Terry Street, Rozelle is unacceptable. It is not a reasonable excuse that the vehicle emissions currently happening along Victoria Road will be constrained within the stack and ejected high into the air.

Victoria Road will continue with current traffic volumes within a couple of years (as happened with Anzac Bridge) and additional traffic will pass through the tunnel.

The first temperature inversion will have the pollutants intended to disperse into the upper atmosphere (questionable supposition that is!) redirected into the near ground air. With a relatively mild level of hayfever I have trouble trapped in traffic as it is. People who are more sensitive need to be protected from the fallout of polluted air.

I am particularly concerned that there are two schools close by and if these emission stacks are not filtered then they should be moved to the alternative site to increase the chances of dispersal. Having observed the stack preparation near Bunnings, Ashfield, I also dread the impact of the construction phase.

By now filtering technology could reduce the impact considerably so I cannot believe that even the currently built stacks are not in line for retrofitting. It is essential any new ones do have filtering (I would think permanently but at the very least on Sydney's high pollution days) for the sake of the residents and the school children nearby - and even the motorists left to travel along Victoria Road.

[REDACTED]
 Submission: Online Submission from James Monroe (object)
https://majorprojects.acelo.com/?action=view_activity&id=227883

Submission for Job: #7485 WestConnex M4-M5 Link

https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

From: [REDACTED]
Sent: Sun, 15 Oct 2017 20:40:57 +0000
To: [REDACTED]
Subject: FW: Submission Details for Craig Channells (object)
Attachments: 227889_Westconnex Submission October 2017_2017Oct16_0739.pdf

From: system@accelo.com On Behalf Of Craig Channells
Sent: Monday, 16 October 2017 7:40:09 AM (UTC+10:00) Canberra, Melbourne, Sydney
[REDACTED]
Subject: Submission Details for Craig Channells (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Craig Channells
[REDACTED]

Address:
[REDACTED]

Rozelle, NSW
2039

Content:
As attached

[REDACTED]
Submission: Online Submission from Craig Channells (object)
https://majorprojects.accelo.com/?action=view_activity&id=227889

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

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

Feedback on Westconnex M4-M5 Link Project

Following is my submission on the Westconnex M4-M5 Link Project. To be clear I oppose this project and do not see it as part of the solution to Sydney long term transport needs. The amount of money spent on this project would be far better spent on public transport infrastructure.

Despite the advertising that projects such as this are helping connect communities this project is doing the exact opposite to my community. Neighbours who have lived in the area in some cases for over eighty years are being forcibly removed from their houses. Many whose houses aren't being forcibly acquired are selling and moving thus further destroying our community.

- Westconnex is not a long term solution to Sydney's transport needs. Public transport is a more cost effective method of moving people around Sydney.
- This project further privatises Sydney's road network.
- The business case for this project has been shown to be inaccurate.
- The EIS shows that several sections of the existing road network will face increases in traffic and as such increased pollution. This is an unacceptable outcome.
- Large pollution chimney stacks should not be built at all let alone in the proposed residential areas. These stack will have a negative social and public health issues on the surrounding area.
- Tunnelling and construction risks further damage to heritage areas and houses as has already happened in existing Westconnex construction areas.
- Potential damage to aboriginal sites along the route and surrounding areas has not been adequately addressed.
- Tunnel construction, vibrations and noise will negatively impact living amenity for those nearby during the lengthy construction period.
- Noise, vibration and pollution from traffic will continue to negatively impact residents should the project be completed and operating.
- The time frame given to read through and assess the large EIS documents is not sufficient.

Below are further points in opposition to this project and comment on the proposed design should it go ahead.

- Design should incorporate separate cycleway down the length of Victoria Road

- Toelle Street should remain closed during and after construction and not become main access point for neighbouring streets
- Exhaust stacks should be filtered and placed well away from residential areas
- The impact of tunnel vibrations from construction and ongoing operation is not clear
- If houses are demolished along Victoria Road unused areas remaining should become open space and not be turned over to housing construction
- Previous misinformation about extent of project such as where tunnels were coming out or extent of roads encroaching on residential areas means we have no trust that there no other aspect to this project being kept from us.
- Dilapidation reports before, during and after construction should be done for all residents who are possibly affected or who request them.
- Alternate accommodation should be offered to all resident within or nearby construction zones.
- Any former residential land where houses have been acquired should be made public open space after construction.
- Any tunnel from Iron Cove to the Anzac Bridge City West link should not be tolled so cars use the tunnel not local streets or Victoria Road.

From: [REDACTED]
Sent: Sun, 15 Oct 2017 20:41:18 +0000
To: [REDACTED]
Subject: FW: Submission Details for company Leichhardt Against WestCONnex (LAW) (org_object)
Attachments: 227887_16_10_2017_LAW EIS SUBMISSION_ APPLICATION NUMBER_ SSI 7485_103 pages__2017Oct16_0734.pdf

From: system@acelo.com On Behalf Of Christina Valentine
Sent: Monday, 16 October 2017 7:35:42 AM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for company Leichhardt Against WestCONnex (LAW) (org_object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Christina Valentine
 Organisation: Leichhardt Against WestCONnex (LAW) (co-convenor)
 Govt. Agency: No

Address:

Leichhardt, NSW
 2040

Content:
 Please find attached the submission from Leichhardt Against WestCONnex (LAW) for Application SSI 7485

The submission is 103 pages and provided in Pdf. A hard copy will also be hand-delivered to the Planning Office today.

LAW represents over 1,000 families in the Leichhardt and surrounding area and this submission is presented on their behalf.
 Christina Valentine, Catherine Gemmell and Jennifer Aaron

Submission: Online Submission from company Leichhardt Against WestCONnex (LAW) (org_object)
https://majorprojects.acelo.com/?action=view_activity&id=227887

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

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



LAW - Leichhardt Against
WestConnex

Email: lawactiongroup@gmail.com

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

Submitted by: Leichhardt Against WestConnex (LAW)

Convenors:

- Jennifer Aaron, 6/38 William Street, Leichhardt, NSW 2040
- Catherine Gemmell, 32 Hubert Street, Leichhardt, NSW 2040
- Christina Valentine, 278 Elswick Street North, leichhardt, NSW 2040

Contact: lawactiongroup@gmail.com

16 October 2016

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

Declaration: None of the signatories on whose behalf this submission is tendered has made any reportable political donations in the last two years



TABLE OF CONTENTS

Introduction	6
Objection to Westconnex and the Project	6
Fundamental flaws with the EIS	9
EIS is Indicative only	9
Lack of ability to comment on the urban design as part of the approval process	9
Non-Compliance with the SEARS	10
Flawed reliance on future toll roads	14
Failure to address overlap in Project impacts	15
Why is it needed?	15
SEARS requirement - Consultation: Project is developed with meaningful and effective engagement during project design and delivery	17
Public comment period	17
Failure to provide content in user-friendly, accessible manner	17
Poor community 'consultation'	18
'Information' Sessions	18
Poor information provided throughout 'consultation' period	19
Misleading, inaccurate information provided as part of 'consultation'	20
Community Reference Group (CRG)	21
Refusal of Minister for Westconnex to meet with community groups	21
Concept Design	21
SEARS requirement - Transport and Traffic	23
Project-wide traffic issues	24
SEARS Requirement - Noise and vibration	27
Poor track record of SMC	30
Access tunnel	31
Night works	31
Hours of operation	31
Mitigation proposed	32
Acoustic barriers and devices	33
Constant out-of-hours work expected and permitted	35
No mention of cumulative effect of aircraft noise - Leichhardt and St Peters	36
Inner West Subsurface Interchange - Noise and vibration impacts	38
Transport and Traffic issues - Darley Road Leichhardt	39
Safety and accident risks posed by use of Darley Road	40

Crash statistics – City West Link and James St intersection	42
Development Application refusal for Darley Road	42
Traffic data is out of date	44
Impact on traffic and the road network	45
The Project will worsen traffic near the Darley Road during and after construction	45
Management of potential impacts	46
Truck Movements	47
Proposed truck routes	47
Alternative spoil haulage route not analysed	48
Lack of detail of vehicle movements	48
CTAMP	49
Alternative access route for trucks	49
Trucks on local streets	50
Further Traffic impacts	52
Local road diversions and closures	52
Contractor worker parking - Leichhardt	52
Traffic operational modelling	53
Heavy vehicle movements during peak hours	53
Tunnel vertical alignments	54
Depths of tunnelling and incomplete EIS diagrams	55
Environmental risks	56
Contamination - Darley Road	56
Risk of settlement (ground movement)	57
Impact on Dobroyd Canal and Hawthorne Canal - Leichhardt	58
Flooding - Leichhardt	58
Removal of vegetation	58
Visual Impacts	59
Health Risks of Project	59
Omission of sensitive receivers	59
Project fails to minimise health impacts	59
Human health risk	60
Dust Impacts	60
Examples of Westconnex failure to adhere to asbestos and dust management measures	61
SEARS Requirement - Air Quality	62
Motorway Operational Ancillary Infrastructure	66
SEARS Requirement: Water - Hydrology	69

SEARS Requirement: Utility Services	70
Flooding and Proposed drainage infrastructure	73
Compensation	79
Post Project	81
Return of the Darley Road site after construction	81
Future use of the Darley Road site	81
ATTACHMENTS	82
Questions in Writing to the Minister for Urban Infrastructure submitted by Anthony Albanese MP	82
Media release issued by Anthony Albanese 'Minister Won't Answer Questions on Westconnex' (18 August 2017)	82
Media release by Inner West Council - 'Westconnex "Claytons: consultation an insult to the community' (25 May 2017)	82
Media release by Inner West Council - 'Council Concerned by Potential Westconnex dive Sites,' 23 September 2016	82
Letter from Peter Jones (Project Director, M4-M5 Link) dated 24 February 2017	82
Letter to Stuart Ayres (Minister for Westconnex) from the Coalition Against WestConnex (CAW)(22 May 2017)	82
Introduction	4
Objection to Westconnex and the Project	4
Fundamental flaws with the EIS	7
EIS is Indicative only	7
Lack of ability to comment on the urban design as part of the approval process	7
Non-Compliance with the SEARS	8
Flawed reliance on future toll roads	12
Failure to address overlap in Project impacts	13
Why is it needed?	13
SEARS requirement - Consultation: Project is developed with meaningful and effective engagement during project design and delivery	15
Public comment period	15
Failure to provide content in user-friendly, accessible manner	15
Poor community 'consultation'	16
'Information' Sessions	16
Poor information provided throughout 'consultation' period	17
Misleading, inaccurate information provided as part of 'consultation'	18
Community Reference Group (CRG)	19
Refusal of Minister for Westconnex to meet with community groups	19
	3

Concept Design	19
SEARS requirement - Transport and Traffic	21
Project-wide traffic issues	22
SEARS Requirement - Noise and vibration	25
Poor track record of SMC	28
Access tunnel	29
Night works	29
Hours of operation	29
Mitigation proposed	30
Acoustic barriers and devices	31
Constant out-of-hours work expected and permitted	33
No mention of cumulative effect of aircraft noise - Leichhardt and St Peters	34
Inner West Subsurface Interchange - Noise and vibration impacts	36
Transport and Traffic issues - Darley Road Leichhardt	37
Safety and accident risks posed by use of Darley Road	38
Crash statistics – City West Link and James St intersection	40
Development Application refusal for Darley Road	40
Traffic data is out of date	42
Impact on traffic and the road network	43
The Project will worsen traffic near the Darley Road during and after construction	43
Management of potential impacts	44
Truck Movements	45
Proposed truck routes	45
Alternative spoil haulage route not analysed	46
Lack of detail of vehicle movements	46
CTAMP	47
Alternative access route for trucks	47
Trucks on local streets	48
Further Traffic impacts	50
Local road diversions and closures	50
Contractor worker parking - Leichhardt	50
Traffic operational modelling	51
Heavy vehicle movements during peak hours	51
Tunnel vertical alignments	52
Depths of tunnelling and incomplete EIS diagrams	53
Environmental risks	54
Contamination - Darley Road	54
Risk of settlement (ground movement)	55

Impact on Dobroyd Canal and Hawthorne Canal - Leichhardt	56
Flooding - Leichhardt	56
Removal of vegetation	56
Visual Impacts	57
Health Risks of Project	57
Omission of sensitive receivers	57
Project fails to minimise health impacts	57
Human health risk	58
Dust Impacts	58
Examples of Westconnex failure to adhere to asbestos and dust management measures	59
SEARS Requirement - Air Quality	60
Motorway Operational Ancillary Infrastructure	64
SEARS Requirement: Water - Hydrology	67
SEARS Requirement: Utility Services	68
Flooding and Proposed drainage infrastructure	71
Compensation	77
Post Project	79
Return of the Darley Road site after construction	79
Future use of the Darley Road site	79
ATTACHMENTS	80
Questions in Writing to the Minister for Urban Infrastructure submitted by Anthony Albanese MP	80
Media release issued by Anthony Albanese 'Minister Won't Answer Questions on Westconnex' (18 August 2017)	80
Media release by Inner West Council - 'Westconnex "Claytons: consultation an insult to the community' (25 May 2017)	80
Media release by Inner West Council - 'Council Concerned by Potential Westconnex dive Sites,' 23 September 2016	80
Letter from Peter Jones (Project Director, M4-M5 Link) dated 24 February 2017	80

Introduction

Leichhardt Against WestCONnex (**LAW**) is a community group formed in August 2016 in response to unconfirmed reports that Sydney Motorway Corporation (**SMC**) had earmarked 7 Darley Road, Leichhardt (the now Dan Murphys site) as a possible mid-tunnel construction ('dive site') for the M4-M5 Link, WestConnex. As a community very familiar with the constraints of the site and its history of traffic accidents and fatalities, and unable to obtain any information from the Government about this proposal, we formed a community group to obtain information and communicate to the Government our serious concerns with this proposal and the Westconnex project as a whole. LAW is not affiliated with any political party and is run by volunteers, without government funding. LAW has over 1,000 members from the Leichhardt and surrounding area.

Objection to Westconnex and the Project

This submission is an OBJECTION to the entire WestConnex proposal (**Westconnex**), including the unapproved M4-M5 Link (**Project**) the subject of the Environmental Impact Statement (**EIS**). Any statements in this submission which refer to amelioration of predicted impacts should not be interpreted as endorsement or support for any aspect of the Project. It is LAW's position that it is patent from the EIS that the impacts of the Project are unacceptable and cannot be managed in such a manner that is acceptable. For the reasons set out in this submission, we do not believe that the EIS meets the Secretary's Environmental Assessment Requirements (**SEARS**) and therefore no part of the EIS should be approved.

Darley Road site should not be assessed as part of this EIS

LAW calls on the Department of Environment and Planning (**Planning Department**) to refuse to approve any part of the EIS relating to the proposed dive site at Darley Road. We seek that Darley Road is ruled out for consideration from this EIS because of the circumstances of the Government lease extension to Tdrahhciel Pty Ltd (Leichhardt spelled backwards) in 2011, which has now been referred to the Independent Commission Against Corruption (**ICAC**) by both the State Member for Balmain, Jamie Parker and the Leader of the State Opposition, Luke Foley. Serious probity issues have arisen with respect to the decision by Transport for NSW (TfNSW), to extend the lease without a competitive tender process and contrary to probity advice. It would amount to gross negligence and maladministration of public funds, for reported compensation of up to \$50 million to be paid to claimants where the matter of their tenure has been referred to our State's top corruption watchdog. [See Media Statement dated 11 October 2017 issued by Luke Foley, Leader of the Opposition http://www.lukefoley.com.au/premier_continues_to_hide_from_the_truth_on_darley_road_site_in_leichhardt]

There are further maladministration of public funds issues related to the Darley Road site that support its removal from consideration as part of this EIS. Documents obtained by LAW (and State

Labor) under FOI laws disclose that the site was renovated *after* the leaseholder was informed in writing by RMS that it would to be acquired. In fact, trade at Dan Murphys commenced just before Christmas 2016, with the PAN issued to the leaseholders on 4 November and the sub-lessee, Dan Murphys (Woolworths) on 22 November 2016. If acquired, this new business will be shut down and the building entirely demolished (renovated for a reported cost of \$7 million), within 18 months of it opening - all at the taxpayer's expense.

There is a compelling public interest in ruling out consideration of the Darley Road site until the probity and value for money issues with this site have been satisfactorily explained and relevant investigative bodies such as ICAC have publicly stated their findings. To persist with consideration of this site for the Project in these circumstances will erode public trust in Government, in the Project and not be reflective of the community's best interests and its right to a proper process. The public interest in this issue is borne out by its media coverage over the past week:

Channel 10 Eyewitness news (lead story 11 October 2017)

<https://tenplay.com.au/news/sydney/2017/10/sydney-news--11-oct-2017>

<https://www.facebook.com/tennewssydney/videos/10155548410840259/>

Daily Telegraph:

<http://www.dailytelegraph.com.au/newslocal/inner-west/nsw-premier-denies-involvement-in-westconnex-lease-deal-that-has-been-referred-to-the-icac/news-story/4fe7db56fa442cc1a005c5b7f2e7ebd5>

News.com

<http://www.news.com.au/national/breaking-news/nsw-premier-referred-to-icac-by-greens/news-story/3260dad8699ff24c5b8e6808a4ced632>

Other media coverage by the SMH in 2017:

<http://www.smh.com.au/nsw/kerry-chikarovski-helped-leichhardt-lease-owner-in-deal-that-has-complicated-westconnex-plans-20170228-gundu7.html>

<http://www.smh.com.au/nsw/westconnex-to-tunnel-at-inner-west-bottle-shop-not-next-to-school-20170331-gvatox.html>

<http://www.smh.com.au/nsw/the-mystery-of-the-bottleshop-the-westconnex-tunnel-and-the-50m-bill-20170514-gw4cy2.html>

<http://www.smh.com.au/nsw/transport-for-nsw-gets-probity-warning-on-leichhardt-lease--so-gets-new-advice-20170607-gwmmsi.html>

This matter has also been raised both in State and Federal Parliament:

Question on Notice tabled in Federal Parliament by Mr Anthony Albanese (**see Attachment**)

Questions Without Notice (NSW Parliament):

<https://www.parliament.nsw.gov.au/Hansard/Pages/HansardResult.aspx#/docid/HANSARD-1323879322-97917>

<https://www.parliament.nsw.gov.au/Hansard/Pages/HansardResult.aspx#/docid/HANSARD-1323879322-97915>

<https://www.parliament.nsw.gov.au/Hansard/Pages/HansardResult.aspx#/docid/HANSARD-1323879322-97976>

<https://www.parliament.nsw.gov.au/Hansard/Pages/HansardResult.aspx#/docid/HANSARD-1323879322-97865>

<https://www.parliament.nsw.gov.au/Hansard/Pages/HansardResult.aspx#/docid/HANSARD-1323879322-97863>

<https://www.parliament.nsw.gov.au/Hansard/Pages/HansardResult.aspx#/docid/HANSARD-1323879322-93155>

Example of media coverage on Darley Road issues.

TUESDAY, APRIL 11, 2017 | INNERWESTCOURIER.COM.AU NEWS 09

WESTCONNEX

Huge bill for bottleshop land

Dan Murphy's store could cost taxpayers \$50m for tunnel site

Jim O'Rourke

NEGOTIATIONS will begin this week to acquire land for WestConnex now used for a Dan Murphy's bottleshop, which could leave NSW taxpayers with a \$50 million bill.

Roads and Maritime Services wants to grab the property in Darley Rd, Lilyfield, to build a construction tunnel for the motorway's underground M4-M5 Link.

But the firm leasing the site from the State Government, and then subleasing it to Woolworths for the shop, said it wanted to be "compensated appropriately".

The Endeavour Drinks Group (EDG), Dan Murphy's parent company and part of the Woolworths Group, confirmed it would also seek compensation from RMS.

The shop opened on December 2 and has a lease until 2038.

Shane Barr, a partner in Tdrachiel Property Development, which holds the head lease on the RailCorp-owned land, said a compensation figure of \$50 million was "in the ballpark".

On March 31, WestConnex Minister Stuart Ayres announced the Dan Murphy's site was the only option for the midpoint access tunnel to build the M4-M5 Link.

Mr Barr said his compensation claim would take into account the rent his organisation would have received from Woolworths until 2038.

"We've just got to hope we get treated fairly and compensated appropriately and don't have to go to the Land and Environment Court," he said.

RMS is meeting Mr Barr's legal advisers this week.

Motorway critics have questioned why Dan Murphy's spent millions of dollars to continue building the shop after it was advised the land may be compulsorily acquired. Taxpayers may be exposed to a greater financial liability because the property is renovated.

EDG head of risk and reputation Andrew Wilmore said work on the building began in January 2016 and continued after it was advised last August that RMS was keen on the site.

Mr Wilmore said the lease meant Dan Murphy's was "legally compelled" to finish building and to open.

Leichhardt Against WestConnex co-convenor Christina Valentine said the Government should not be paying up to \$50 million of taxpayer dollars to a private company in circumstances where the leaseholder knew the site was likely to be acquired – and then pushed through with major renovations.

An artist's impression of the tunnel entrance at the St Peters interchange, with the ventilation facility behind the trees in the centre.



GREEN DREAM DRAWN UP FOR PARK

RESIDENTS living around the WestConnex interchange being built near Sydney Park have been given their first glimpse of what new open space and recreational facilities will be provided.

The New M5 Draft Urban Design and Landscape Plan also provides details of ventilation stacks to be built above the motorway tunnels at the corner of Canal Rd and the Princes Highway.

Released by the Sydney Motorway Corporation on Friday, the plan shows that the former Alexandria landfill dump at St Peters is being transformed into 8.5ha of community space.

A 2.5ha slice of that space will include a full-size soccer field as well as options for multipurpose sports courts and walking paths linked to Sydney Park via a bridge.

About 6ha of the open space will be built in and around the spaghetti road junction where the new M5 will meet the M4-M5 Link.

WestConnex Minister Stuart Ayres said the State Government was proud to have the former landfill site enjoyed by local residents, while also delivering vital infrastructure for motorists.

Motorway critics said the ventilation stacks would disperse non-filtered, diluted vehicle exhaust emissions.

WestConnex Action Group's Pauline Lockie said the stacks would spew unfiltered toxic fumes over homes and schools.

"This so-called 'open green space' will be surrounded by the noise, stench and pollution caused by WestConnex's unfiltered stacks, giant flyovers and six-lane highways," she said.

• An information session is being held at the New M5 Community Information Centre, 27 Burrows Rd, St Peters, tomorrow from 5-8pm.

Fundamental flaws with the EIS

It is LAW's contention that the EIS should be rejected in its entirety on the basis of its fundamental flaws, as set out below.

EIS is Indicative only

As is stated in the EIS:

'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 impact of proposing an 'indicative' only design is that the community is deprived of the opportunity to comment on confirmed plans. This is significant because there is no other formal consultation process mandated under Part 5.1 of the *Environmental Planning & Assessment Act (EPA)*. Only where there are major changes identified as such in the Preferred Infrastructure Report (**PIR**) is there the possibility of the PIR being made public (section 155Z, EPA). Even where this occurs, there is no requirement that further community input will be permitted and no guarantee that any public comment on the PIR will occur prior to finalisation of the contractor contracts. When this issue was raised with representatives of Roads and Maritime Services (**RMS**) and Sydney Motorway Corporation (**SMC**) they stated that the EIS was provided in indicative form because 'this is what the community asked for,' assumedly because of concerns at earlier Stages that the design had been agreed with contractors and could not be amended. We reject this assertion and believe that the EIS is fundamentally flawed. The community has asked for more consultation and input, not to be locked out of decisions about how the project will be implemented.

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 measures cited with respect to construction noise mitigation for (example) will not be adopted.

Lack of ability to comment on the urban design as part of the approval process

The EIS, if approved, does not provide any opportunity for the public to comment on the urban design and landscape component of the project. It states that: *'a detailed review and finalisation of the architectural treatment of the project operational infrastructure would be undertaken during detailed design'*. The quality of this detailed design will influence the impacts of the project on the community. The Community should be given an opportunity to comment upon and influence the design.

In addition, the EIS should not be approved on the basis that it does not provide a reliable basis on which to base the approval documents. Because of its indicative nature the EIS is riddled with caveats and lacks clear obligations and requirements on project delivery. It is, at most, a dressed-up 'concept design'. A further impact of an indicative design is that the EIS acknowledges 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.

Non-Compliance with the SEARS

We object to the Project because it does not comply with the SEARS requirements. The EIS must include, but not necessarily be limited to, a description of the project and all components and activities (including ancillary components and activities) required to construct and operate it, including the location and operational requirements of construction ancillary facilities and access.

Insofar as it describes the Darley Road civil and tunnel site (C4) at Leichhardt, the EIS does not meet this requirement because it does not describe the components and activities that have been described to the community either in meetings with LAW or at the WestConnex Community Reference Group established by SMC.

The EIS has been released before the proponent is able to describe how it actually plans to carry out construction activities at Darley Road, Leichhardt, in particular the plan for staging the arrival of spoil trucks. The proponent via its agent Peter Jones (SMC) has advised on several occasions that spoil haulage trucks will be staged from the Sydney Ports land on Glebe Island via James Craig Road. This is to avoid the situation at Haberfield where trucks circle the Northcote St site as they are not able to queue to enter it creating congestion and noise impacts as they drive slowly into Wattle St and Ramsay St. before making a second run at the Northcote St site from the Parramatta Road entrance. No details of this staged spoil haulage proposal at Darley Road, Leichhardt are provided other than that *'construction traffic may also access the Darley Road civil and tunnel site (C4) at Leichhardt via the westbound lanes of City West Link'*.

Peter Jones (SMC) has advised that he is in the process of finalising an agreement with Sydney Ports which will enable him to stage trucks from a location on Glebe Island via James Craig Rd. The EIS should not have been released before this plan was finalised. Peter Jones has advised that he is only required to describe the 'worst case scenario' in the EIS, which is trucks arriving ad hoc via the eastbound lanes of City West Link. The EIS should describe what the proponent actually plans to do, as well as the worst case scenario, so that the impacts of all options being considered can be assessed and commented on.

It is not clear from the EIS how the alternative plan for the staged arrival of spoil trucks from Sydney Ports will be documented and how stakeholders will have an opportunity to assess its impacts. The EIS does not specifically state that this staged arrival plan will be documented in the CTAMP, the Ancillary Facilities Management Plan or the Preferred Infrastructure Report.

Project Alternatives

There is no need for a dive site between Haberfield and Rozelle for the Project to be built; on SMC's own admission, its sole justification is a time saving (tunneling) of several months. It is unacceptable that the community should be forced to endure five years of severe disruption to accommodate the timetable of these private contractors, no doubt with bonuses pegged to completion dates. The EIS should not be approved on the basis that it contains no real justification for the Darley Road site.

We also note that the EIS fails to demonstrate that feasible alternative sites (which are less impactful on the community) have been properly considered. In 4.6.2 Construction Ancillary Facility Locations, the EIS states:

"Throughout the development of the project, a number of potential construction ancillary facility sites were investigated but were excluded from the project for various reasons. These sites and the reasons they do not form part of the project are outlined in Table 4-7. The location of these sites is shown in Figure 4-17. Other design refinements related to construction ancillary facilities included limiting construction activities at Darley Road civil and tunnel site (C4) to standard construction hours only, where out-of-hours works were initially proposed. The refinement was included to minimise noise impacts on surrounding receivers and minimise heavy vehicle movements on local roads outside standard construction hours. This refinement was made following consultation with relevant stakeholders and the community."

Table 4-7 references Blackmore Park (Oval) and an unspecified site on the City West Link, Lilyfield:


Site name	Works proposed	Reasons for excluding this site	Project function provided by
Blackmore Park, Leichhardt	Tunnel and civil site – support tunnelling of the mainline tunnels including launching road headers and spoil management and haulage	Would require temporary loss of passive and active open space and vegetation removal. Community and stakeholder feedback requesting that impacts on public open space be avoided was also taken into consideration during relocation of the ancillary facility site. Access to the site was constrained by a narrow road (Canal Road) and the restricted height clearance under the light rail bridge.	Darley Road Civil and tunnel site (C4)
City West Link, Lilyfield	Tunnel and civil site – support tunnelling of the mainline tunnels including	The temporary access tunnel between the site and the mainline tunnels would be around 750 metres in length. Constructing this temporary access tunnel before tunnelling of the mainline could begin from this site would have	Rozelle Civil and Tunnel site

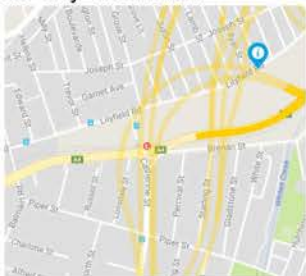
launching road
headers and
spoil
management
and haulage

resulted in substantial construction
program delays.

There is the potential for the site to be contaminated given current and previous land uses. The site is in proximity to active light rail corridor facilities and would require tunnelling under the light rail line. There are level differences between the site and surrounding roads which would constrain access.

Our response is as follows:

EIS	Issue	Submission
1. The EIS omits to refer to a number of alternative sites that were considered for dive sites in Leichhardt and Lilyfield such as Pioneer Memorial Park, the Bus Museum and a site near le Montage. These are sites that Peter Jones of SMC has directly informed LAW.	The EIS therefore does not provide the necessary level of detail to allow the impacts to be appropriately assessed.	Darley Road should be rejected as a dive site because the alternatives have not been appropriately explained in the EIS.
2. The EIS suggests that the restriction on out of hours work was made following consultation with the relevant stakeholders and the community.	There was actually no consultation with the community before this decision was made. LAW met with Peter Jones for the first time in November 2016 and was advised at that meeting that there would be no spoil trucks after hours. The EIS is misleading and therefore does not provide the necessary level of detail to allow the impacts to be appropriately assessed.	Darley Road should be rejected as a dive site because its selection is based on the misleading suggestion that the community have been adequately consulted at all stages when this is not the case.
3. The reasons given for ruling out alternative sites are incorrect, incomplete or vague: <ul style="list-style-type: none"> Blackmore Park (Actually Blackmore Oval) is subject to inundation and that is why it was ruled out according to SMC. This reason is not even mentioned in the EIS. The Inner West Council's independent engineer, Jim Holt, identified the "City West Link, Lilyfield" site in the Western Rozelle Railyards (shown adjacent) as a more viable and 'less impactful' alternative than Darley Road and Derbyshire Road, yet the EIS does not adequately explain why this site 	<p>The EIS is misleading and does not provide the necessary level of detail to allow the respective impacts of the various dive site options to be appropriately assessed and should not form the basis of accepting Darley Road as a dive site location.</p> 	<p>Darley Road should be rejected as a dive site because the alternatives have not been adequately considered.</p> <p>The proponent should be required to provide options that would make the "City West Link, Lilyfield" site a viable alternative.</p>

<p>has been ruled out. The site in the railyards is where the 2 large sheds are in the image below.</p> <ul style="list-style-type: none"> The EIS states that 'There are level differences between the site and surrounding roads which would constrain access.' Peter Jones is considering a way of loading up spoil trucks directly onto the City West Link via a hopper from the Darley Rd site (not detailed in the EIS but disclosed to Leichhardt Against WestConnex). 		
<p>4. The EIS states that 'The temporary access tunnel between the site and the mainline tunnels would be around 750 metres in length. Constructing this temporary access tunnel before tunnelling of the mainline could begin from this site would have resulted in substantial construction program delays.'</p> <p>The EIS does not state what these delays would be or how they could be mitigated.</p> <p>There is no discussion of how the proponent could make the alternative site work.</p> <p>There is no explanation as to why the tunnel alignment could not be changed to be nearer the alternative site.</p>	<p>The basis for rejecting the City West Link site is incorrect, as it is directly over the alignment of the tunnel off the City West Link.</p>  <p>It should be a requirement that the proponent investigates how to make the alternative site viable.</p> <p>The residents near Darley Rd and others should not be impacted just because the proponent wants to save time.</p> <p>The EIS is incomplete and inadequate and should not form the basis of accepting Darley Road as a dive site location.</p>	<p>The Darley Road site should be rejected on the basis that the proponent has not adequately considered less impactful alternatives.</p>
<p>5. The EIS states that potential contamination is a reason not to use the City West Link site</p>	<p>7 Darley Rd is a known contaminated site (it is on the EPA register of contaminated sites). 7 Darley Rd is also closer to waterways than the City West Link. If contamination is a reason to reject one site then it is a reason to reject the other site.</p> <p>If no sites without contamination can be found then the proponent must execute the project without a mid-point dive site.</p>	<p>The Darley Road site should also be rejected due to contamination and the risk of contaminating our waterways.</p>
<p>6. The EIS is incomplete, deficient and superficial in its explanation of the reasons for alternative sites not being</p>	<p>The EIS does not compare the impacts of the alternatives vis a vis the chosen sites. We are therefore unable to assess whether the proponents site choice</p>	<p>The Darley Road site should be rejected on the basis that the proponent has not provided a comparison of the impacts</p>

considered or no site at not being considered.	is justified as the one with the least impact. Peter Jones advised Leichhardt against WestConnex that Darley Road was not an ideal site and rated it as 50%. The proponent is forcing an unsuitable and inappropriate site onto the community in its haste to complete the project.	of the alternatives vis a vis the chosen site.
7. The EIS does not present the impacts of having a mid-way tunnelling site between Haberfield and Rozelle compared to the impacts for having no mid-way tunnelling site at all.	The impacts of construction with and without a mid-way tunnelling site should be clearly set out. Innovative tunnelling methods should be assessed to see if a mid-way tunnelling site can be avoided.	The Darley Road site should be rejected on the basis that the rationale for a mid-way tunnelling site and the alternatives have not been adequately investigated.

In conclusion, the EIS does **not** adequately explain the alternatives to a dive site at Darley Road or the rationale for their rejection. The proponent should be required to better explain the case for subjecting the community to very severe impacts for five years. The proponent's EIS in this respect is superficial and inadequate. The noise, safety and congestion impacts and health risks associated with a site at Darley Road (exposure to silica, increased asthma) may be better mitigated at the City West Link site.

The reasons given for ruling out the City West Link site, or indeed the need to have any dive site, are open to challenge. To allow this site to be selected, where there are other known, less-impactful site, is negligent and unacceptable.

If the impacts on either site noted above cannot be satisfactorily mitigated (and we contend that it is evident in the case of Darley Road that they cannot be), then neither site should proceed and the proponent should be required to redesign the Project (and reassess its timeframes) without a dive site between Haberfield and Rozelle. The fact that it may be quicker and cheaper to build the Project with a dive site is not a sufficient justification where the impacts to the community are severe and long-term, and not mitigated to an acceptable level, as is the case with the Darley Road proposal.

Flawed reliance on future toll roads

The EIS is flawed because of its inappropriate and misleading reliance on future, unapproved and unfunded toll roads which the EIS (repeatedly) claims will reduce the impacts of the Project (in particular traffic impacts). The building of more toll roads is even presented as a benefit of the Project, with the Executive Summary providing:

'future opportunities for improved connectivity in Sydney's transport network to be realised by allowing for connections to proposed motorway projects, including the Western harbour

Tunnel and beaches Link project to the north, the Sydney Gateway project (via the St Peters interchange) and the F6 extension (via the New M5 Motorway to the south'. (EIS, vi).

Throughout the EIS, when measuring and commenting upon potential impacts, are statements that the identified negative impacts will be lessened or ameliorated when these additional toll roads are built. However, it is flawed and misleading to rely on the building of future toll roads when explaining and assessing the impacts of this Project. These toll roads are mere concepts at present and, if approved, would not be built for many years (a matter which is not properly explained in the EIS). The State Opposition has publicly stated on numerous occasions that if it takes office in March 2019 these toll roads will **not** be built. The details of these toll roads are not known; they are mere concepts at best. To take into account - in **any** manner when assessing this Project - possible future toll roads is completely inappropriate. Planning should not permit possible future toll roads to be taken into consideration in assessing the Project's possible impacts.

Failure to address overlap in Project impacts

There are overlaps in the construction periods of the New M5 and M4 for Haberfield residents that are not properly explained nor their impacts analysed in this EIS. The EIS makes no attempt to measure or mitigate the cumulative impact of these prolonged periods of construction noise exposure. 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. Failure to comply substantially with the SEARS requirements

Throughout this submission we will outline the manner in which the EIS consistently fails to meet the legislative requirements contained in the SEARS (issued 3 March 2016, 9 November 2016 and 3 May 2017). As such it is our contention that the Planning Department should **not** approve this EIS for the Project.

Why is it needed?

This question is asked (and apparently answered) in one page in the Executive Summary (v). We reject the assertions and justifications for Westconnex and the Project in their entirety. Westconnex is based on a business model that relies upon increased car use; it entrenches car dependence. The NSW Government should be planning to reduce car dependency to avoid further deterioration in our air quality. No amount of so called parks, cycleways or pedestrian walkways will mitigate the polluting impact of this Project.

Throughout this EIS, RMS fails to substantially address key components of the SEARS, which suggests that it has been rushed out in order to meet the Government's time frame for selling 51% of the mainline tunnel component of the Project.

RMS do not explain how this Project is a solution to transport freight, which was the justification for the entire Westconnex project. It is unbelievable that Westconnex does not actually go to the port or the airport and it is now obvious that the reason is so that Lendlease can make an unsolicited proposal to build the Sydney Gateway in order that an additional toll revenue stream can be generated. Once sold, the Government will have no control over what is built.

RMS fails to explain how congestion will be dealt with in this EIS. The EIS states that the road network will improve once the Western Harbour Tunnel and Beaches Link opens, which means that residents will have to endure worsened traffic conditions for up to 10 years. While the traffic on the City West Link is forecast to decrease by up to 40 per cent once the project is completed, this is based on unsubstantiated evidence that commuters will choose to use the tollway. There is limited evidence to support these statistics and it is likely that many people will choose to use local roads to avoid the toll which will result in significant rat-running (and there is no plan in the EIS to manage this issue).

There is nothing in this EIS that suggests that the toll road will improve connectivity with public transport or how this toll road will link in and improve public transport options. The proposed 8-lanes of tolled roads do not even contain a bus lane! The Project in fact negatively impacts on future public transport options, involving for example the removal of the historic goods tram lines from the Rozelle railyard to Balmain. But the Project is of course predicated upon increased use of private vehicles, with public transport alternatives presenting a risk to future toll road revenue.

It is patent that this EIS is intended to procure an approval to sell to the private sector, not an approval to build the project under certain conditions. Significantly, if approved, there can be no real enforceable conditions because the design is not complete.

Another key failing is that the EIS does not adequately address Project risk. For example, no expressions of interest have been lodged to build the Rozelle interchange. Yet there is only one sentence in the whole EIS about the risk of not being able to complete the Rozelle interchange. Again RMS is ignoring inconvenient facts and is minimising its analysis of risk to NSW when it doesn't suit the Government's agenda and timeframe for completion of this Project. The outcome of this failure to properly manage risk will be very poor for our community. Costs blowouts are inevitable, which will further erode an already questionable business case.

There is critical lack of financial justification for Stage 3. In the original Business Case, Stage 3 was required to connect Stages 1 and 2 but RMS now state in the EIS that Stages 1, 2 and 3 don't make financial sense unless we also build the F6, the Western Harbour Tunnel, the interchange in the Warringah Freeway and the Northern Beaches link. In addition the Government will have to toll the Sydney Harbour Tunnel and the Sydney Harbour Bridge for an extra 30 years to make this Project break even. RMS's justification is that if we keep on building more roads then Westconnex Stage 3 will make financial sense. This is malfeasance in public office, nothing less.

RMS's discussion on strategic alternatives is inadequate and is not evidenced by any analysis or data. RMS state that that *'Individually none of the alternatives would effectively replace the need for Westconnex'*. This ignores the fact that if you add the alternatives together they more than replace the need for Westconnex. The EIS should be rejected because it fails to acknowledge the circumstances in which the Project would not be necessary.

We note that there is limited short or long-term benefit for residents in the vicinity of the Darley Road dive site flowing from this Project. The EIS provides that Darley Road traffic will actually increase by 4% following the completion of the Project in 2022. Leichhardt residents, particularly those close to Darley Road, will be forced to endure years of highly intrusive construction impacts to then derive no benefit from the Project.

SEARS requirement - Consultation: Project is developed with meaningful and effective engagement during project design and delivery

The SEARS (March 2016, item 2) states that *'the project is developed with meaningful and effective engagement during project design and delivery'*. The EIS does not comply with this requirement, as discussed below.

The Executive Summary heading asks: *'How did the community participate in selecting the preferred project?'* Our response to this question (and to its answer on pages xiii-ix) is that the community has **not** been provided with an opportunity to meaningfully comment on the Project. This is because of the paucity of Project information, the lack of adequate response to direct questions and indeed, actual misinformation that has been provided by representatives of both SMC and RMS. Nor has the public been provided Project information in a user-friendly and appropriate manner.

Public comment period

The decision to allow only 60 days for submissions to this EIS was unrealistic and unfair given the length and complexity of the document and the inclusion of school holidays during this period, when many families are away. The Inner West Council elections were held during this period (as a result of this Government's forced mergers), which severely disrupted the ability of the Council to prepare a submission, with Councillors sworn in less than three weeks ago. Despite writing to the Planning Department on several occasions, the Council's requests for an extension of time have been refused. A key stakeholder has been denied the opportunity to effectively represent the community's views with respect to local impacts.

Failure to provide content in user-friendly, accessible manner

In addition, the 7,000+ plus pages of highly-technical information comprising the EIS has not been presented in a manner that is user-friendly (and with few hard-copies provided). The difficulty in digesting and understanding this mammoth and complex document compelled local community groups to create a website where the information could be easily accessed (<https://thepeopleseis.wordpress.com/>). Community groups such as LAW also held their own 'information sessions' where relevant content could be communicated via Powerpoint slides and summary handouts. This should not have been the community's responsibility - the EIS could have been provided in a manner that made it easier for members of the public to understand the impacts, with appropriate summary documents and a user-friendly dedicated webpage..

Poor community 'consultation'

In LAW's experience the quality of community consultation on the Project has been very poor. It has not been *'informed by consultation, including with relevant local, State and Commonwealth government agencies, infrastructure and service providers, special interest groups (including Local Aboriginal Land Councils, Aboriginal stakeholders, and pedestrian and bicycle user groups), affected landowners, businesses and the community'*. (SEARS, March 2016, item 4). The Executive Summary of the EIS sets out what is touted as 'community consultation' (pages xiii-ix), stating:

'project-specific consultation with stakeholders began following the lodgement of the SSI application report in January 2016. Stakeholders (including the community) have been provided with project specific information and opportunities to raise questions and provide suggestions and feedback.'

'Information' Sessions

It is simply wrong to state that 'consultation' commenced in any meaningful way from January 2016. The first 'information session' for members of the public relating to the Project was not held until August 2016. This session was notable for its lack of information, with members of the public encouraged to write comments on yellow sticky notes. A true information session would involve a presentation with summaries of key impacts; an open forum for Q&A and information presented in an accessible and user-friendly manner. The staff on duty were not from the relevant project team and clearly knew nothing about the technical details of the Project, seemingly being temporary staff engaged for the day via seek.com. The actual information, such that it was, comprised glossy artist's renditions on the walls, with little information on negative impacts. The posters themselves were inaccurate, lacked detail and were sloppy. For example, St Columba's Primary School (which is 400 metres from the proposed Darley Road site) was not included on the poster depicting schools in the areas affected (despite having been established in 1870). When I raised this at the time I was told the maps were 'indicative only.' Eventually I was issued with an apology by Kylie Cochrane of SMC, but the failure to include impacted schools is indicative of the lack of information and misinformation which has been the hallmark of the entire consultation process. Interestingly, despite repeated statements that SMC had consulted with key stakeholders, the St Columba's School was never contacted by SMC or RMS, and eventually took it upon itself to do so in September 2017.

At this information session in August 2016 there was no information whatsoever as to the number or location of proposed construction sites. The two options under consideration in Leichhardt (Derbyshire Road next to Sydney Secondary College - Leichhardt campus and Darley Road) were only publicly confirmed in February 2017 when SMC door-knocked and dropped a letter to residents in the area. The reason the community was informed (not consulted, just informed) was because of a breaking story in the Daily Telegraph, published the next day, stating that the School site was under consideration. For RMS to suggest that any meaningful consultation took place from January 2016 is therefore inaccurate. In fact, the letter in January 2017 was the only official notification

received by residents from the Government even mentioning the proposed construction site locations.

The community was not 'consulted' about any of the construction sites prior to the Concept Design released in mid 2017, despite the fact that the EIS now reveals there are in fact five major construction sites planned for the M4-M5 link. While LAW had several meetings with RMS and SMC during this period, no information was forthcoming and we were instead repeatedly advised that the details 'would be in the Concept Design', which they were not.

Poor information provided throughout 'consultation' period

Information made available online on the Project on the Westconnex webpage has been generally out-of-date, inaccurate and sparse on detail. With respect to the M4-M5 link, WestConnex provided a one page high-level summary of the proposed link on its official website, with no details other than a line on a map with the proposed route and an indicative timeline for approval of the Project. This page remained unchanged for over 12 months, with no updated information provided to the public either by mail or online, let alone on their '1800' hotline.

The second 'round' of community consultation that occurred between May and June 2017, was characterised again by lack of information and misinformation. While representatives of the Project were in fact in attendance at this session, their answers were inconsistent, light on detail or simply not forthcoming. Most questions were met with the response: *'All of the details will be in the EIS.'* Letters from the responsible Minister during the 'consultation' period repeated this mantra. In respect of the Darley Road site, at the second 'round' information session, there was simply a poster of the proposed 'dive' site but seemingly no ability on the part of the representatives to provide any detailed answers.

SMC seem to equate 'information' (glossy flyers and facebook posts) with 'consultation'. SMC have an endless budget and money for highly-paid consultants to spruik the benefit of the Project. But genuine consultation involves an exchange of information and consideration of community and stakeholder views.

The failure of SMC's community engagement, however, is most evident when the content of the EIS is critically examined. The key issues raised by LAW repeatedly to both RMS and SMC are not resolved or even addressed in the EIS. For example, LAW repeatedly asked where the estimated 100 plus workers will park at the Darley Road site. The EIS provides for 12 car spaces and no other allocated parking. LAW was told over and over again that this issue would be addressed in the Concept Design. It was not even mentioned in the Concept Design. We were then told that it would be addressed in the EIS. Again, it is not satisfactorily resolved with no provision for worker car parking. In fact the EIS acknowledges that workers will park on 'local adjacent streets' and would instead be 'encouraged to use public transport.' Clearly our views expressed as part of this 'consultation' were ignored. The experience of LAW appears to be similar to that of others. When

the overall Project proposal is considered, it is clear that it has not been informed by genuine community consultation.

Misleading, inaccurate information provided as part of 'consultation'

Information that has been provided during the 'consultation' process has been either not provided, misleading or inaccurate on many occasions. For example SMC continually state that they abandoned Blackmore Park (oval) and Easton Park because they 'listened to the community.' However LAW was told by SMC that Blackmore oval could not be used as a tunneling site because it suffered from inundation and that Easton Park had a geotech fault, also rendering it unsuitable. This misrepresentation has been repeated in countless public statements and glossy flyers spruiking the Project, and again is again repeated in the EIS.

LAW was continually misled about the status the the dive site selection. Plans for the Darley Road 'dive site', were only revealed verbally by SMC Stage 3 project director Peter Jones after repeated questioning at the August 2016 information session at Leichhardt Town Hall. Mr Jones stated that there was a 'possibility' that the site would be taken, but that 'nothing had been confirmed'. However, information obtained by LAW under FOI laws revealed that two days after this conversation RMS and SMC met with the leaseholders of the Darley Road site to commence commercial negotiations for its acquisition. The Government had in fact decided upon this site without consulting with the community and directly misled the community when asked about this matter.

Another example of misinformation also relates to the Darley Road site. After LAW attended a two-hour meeting with SMC, RMS and the Inner West Council in November 2016, Mr Jones agreed to look at alternative sites which were not as impactful to the community. He undertook to rule out the acquisition of any mid-point dive site in the area if a suitable site could not be located. Trusting that this was a genuine undertaking, LAW lobbied the Council to engage an independent engineer to assess the suitability of the Darley Road site and to consider alternative sites which would not be as impactful. This process of 'consultation' entailing the consideration of alternative sites continued from September 2016 until June 2017 when the engineer's report (which soundly rejected Darley Road as suitable) was provided. During this period, LAW and the Council had numerous meetings with SMC, RMS and the Council about alternative sites and was repeatedly informed by the Minister for Westconnex, the engagement lead (Kylie Cochrane) and RMS, that no decision had been made as to the selection of the dive site. A copy of relevant letters is **attached**. However, information obtained by LAW under FOI laws revealed that this entire process of consultation and 'listening' to the community and considering alternative sites, was a sham. This is because RMS issued a notice to acquire the Darley Road site to the leaseholders on 4 November 2016 and then to the lessee (Dan Murphys) on 22 November 2017 (mere days after LAW met with SMC and RMS). This misleading and duplicitous behaviour has been reported in the SMH and other media outlets: <http://www.smh.com.au/nsw/the-mystery-of-the-bottleshop-the-westconnex-tunnel-and-the-50m-bill-20170514-gw4cy2.html>

Community Reference Group (CRG)

Formal consultation has also been poor, being neither 'effective', nor 'meaningful', as required by the SEARS. Two of LAW's convenors are members of the Westconnex Community Reference Group (**CRG**), convened as part of 'consultation' by Westconnex. The two 'engagement' representatives who attend the meetings on behalf of SMC have no technical knowledge whatsoever and no real understanding of the Project. At the CRG almost every issue raised about Westconnex (all three Stages) is taken on notice. Several SMC project directors refuse to attend meetings to answer questions or, when they attend, treat the community concerns with disdain. Despite the Terms of Reference stating that RMS (the project proponent) would attend the meetings, this did not occur for several meetings and until the community representatives insisted they do so.

Refusal of Minister for Westconnex to meet with community groups

The Project's responsible Minister (Stuart Ayres, Minister for Westconnex and Sport), despite numerous requests by letter and repeated phone calls to his Ministerial and electorate office, refused to ever meet with LAW. The CRG also wrote to the Minister asking him to attend the meeting and he refused.

In addition, local Government members have refused to provide project information and instead referred written requests from members of the public to SMC. When LAW wrote to John Sidoti (the then Parliamentary Secretary for Transport, Roads, Industry, Resources and Energy) he did not respond to LAW. Instead, he provided LAW's letter to Kylie Cochrane (a private consultant engaged by SMC) who wrote back on behalf of the Government! It is completely unacceptable that elected public officials who are responsible for this Project should refer community correspondence to a private consultant in this manner. We are aware this was not an isolated incident as other community groups who wrote to other members of the State Government received the same response. See **attachment**.

Concept Design

We now turn to consideration of the Concept Design which formed part of the 'consultation' process. The community was continually told '*We don't have to give you a concept Design*'. They need not have bothered. It was a sloppy document, full of errors and unreadable on screen and not printable in a format that could be read. We raised these issues with Nicole Ryan from SMC at the time and the entire document was required to be reformatted and reissued. The Concept Design also initially contained no closing date which was confusing. Nor did SMC notify a closing date in its medium for informing the community, newsletter 'Inside Lane'. Community organisations such as LAW received many complaints about this document, such that the Coalition Against Westconnex (**CAW**), a coalition of 12 community groups opposed to Westconnex, wrote to the Minister for Planning and the Minister for Westconnex demanding that the document be substantially redrafted and reissued. A copy of the letter and the media statement issued by the Inner West council on the Concept Design is **attached**.

The EIS was released less than just two weeks after the 'closing date', suggesting that the 2000+ formal submissions were not even considered in the EIS, strong evidence refuting any claim that thousands of submissions were even read, yet alone considered, in the EIS.

We therefore reject any assertion in the EIS that there has been robust community engagement and proper community consultation as part of the Project and as required by the SEARS.

SEARS requirement - Transport and Traffic

The project proponent is to comply with the following SEARS requirements with respect to Transport and Traffic:

Network connectivity, safety and efficiency of the transport system in the vicinity of the project are managed to minimise impacts.

The safety of transport system customers is maintained.

Impacts on network capacity and the level of service are effectively managed.

Works are compatible with existing infrastructure and future transport corridors (Key Issue, item 1, SEARS March 2016)

[Photograph of Darley Road, Leichhardt, with queues to James St/City West Link intersection]



Project-wide traffic issues

The EIS should be rejected on the ground that it does not adequately explain, nor manage effectively, the probable traffic impacts of the Project. Nor does it ensure network connectivity, safety and efficiency of the transport network as required by the SEARS.

In the Executive Summary for Appendix H, 6 Existing Road Network Performance, RMS states that the road network in the study area currently functions under high levels of traffic demand, which often exceeds the operational capacity, especially citybound during the AM peak period and goes on to state that:

'In the Haberfield, Rozelle and St Peters road networks, current average speeds of less than 30 kilometres per hour in the AM and PM peak periods are reported on several key roads.' (Page xxiv).

The Minister for Planning should reject RMS's justification for Westconnex on traffic grounds because it has based its assessment on what is reported, as opposed to what they have analysed to be the case. The summary goes on to state that *'conditions may cause traffic to seek alternate routes.'* (page xxv). Again, it is not sufficient to merely speculate on what the effect may be. RMS should be presenting the actual effect of the congested conditions based on its analysis.

In the Executive Summary RMS states:

'Any investment in motorway infrastructure has to be aligned with supporting public and active transport initiatives to achieve an increase in capacity, while aiming to reduce the reliance on and demand for private vehicles on the future road network.'

But RMS fails to provide details of how it will reduce demand, what the level of reduction would be and importantly, whether collectively these demand reduction measures would make WestConnex redundant or unjustified.

In the Executive Summary for Appendix H, RMS states that:

'While public transport is also part of this mix, it is recognised that not all trips in Sydney can be served by public transport, especially trips to dispersed destinations or commercial trips requiring the movement of large or heavy goods/materials.'

It is astonishing that RMS has failed to measure how many trips will be avoided if public transport alternatives are available and what those public transport alternatives might be.

There is also no discussion anywhere in the EIS of the effectiveness of any of the planned public transport measures. The Sydney Metro will go directly under St Peter station but there is no interchange planned for St Peters station. Nor is there a Sydney Metro stop in Alexandria or Erskineville. It is obvious to all that traffic flows more smoothly and is much lower during school holiday periods when a much lower number of commuter trips are taken. RMS also fails to consider how many commuters would travel by train, bus or light rail if they had the option to do so and by how much this would reduce congestion. It appears that in its EIS, RMS prefers to avoid inconvenient questions the answers to which would make the Westconnex and the project unjustified.

Also unbelievable and unsubstantiated is RMS's statement that:

'WestConnex is an enabler of integrated transport and land use planning, supporting the development of initiatives including The Bays Precinct and the Parramatta Road Corridor Urban Transformation: Infrastructure Schedule (UrbanGrowth NSW 2016).'

International corporation Google has publicly stated that they decided against a HQ in the Bays precinct because of the lack of planning for public transport. NSW can have integrated transport and effective land use planning without Westconnex and RMS should not be representing that Westconnex will support these very worthwhile aims, without providing evidence of how it will actually have a positive impact on these outcomes.

On Page xxxi of Appendix H under 'Cumulative Operational Performance Summary,' RMS states:

'In both 2023 and 2033, comparing the 'cumulative' scenario to the 'with project' scenario:

- *Anzac Bridge/Western Distributor is forecast to be less congested eastbound in the AM peak period due to traffic reassigning to the proposed future Western Harbour Tunnel (and Beaches Link in the 2033 'cumulative' scenario)*
- *In the PM peak period, the network functions similar to the project case, with fewer unreleased vehicles on Western Distributor due to traffic reassigning to Western Harbour Tunnel (and Beaches Link in the 2033 'cumulative' scenario).*

Primarily due to capacity constraints on Anzac Bridge and the Western Distributor, forecast demands cannot access the road network during the peak periods due to congestion extending back into model entry points. This occurs at the model boundaries on Victoria Road, City West Link and The Crescent/Johnston Street. Potential mitigation measures are discussed in section 11.2.'

The cumulative operational performance summary fails to describe the scenario if the Rozelle interchange is completed but if the Western Harbour Tunnel and subsequently the Warringah Freeway interchange and Beaches link are not completed. It is misleading to present a scenario which provides a justification for Westconnex when the scenario is based on projects that have not yet even been funded, justified, designed or modelled. RMS should have made it clear that there were significant subjectivities to its 'with project' scenarios which render them meaningless for the purpose of assessing the traffic impacts of the M4-M5 link EIS. Failure to do so renders their claims and analysis misleading and of limited use in assessing the impacts of the Project.

The Rozelle interchange will create a serious traffic problem that would then be the justification for building the Western Harbour tunnel - and RMS has failed to point this out in its EIS. Based on RMS's own figures the ANZAC bridge would have to carry 60% more traffic than the ANZAC bridge can physically hold to make this project work. RMS is conveniently ignoring facts that are inconsistent with its attempt to make a case that the Rozelle interchange will improve congestion.

The Rozelle interchange will dump traffic onto a bridge that is already at 100% capacity. RMS have concluded that the Anzac bridge congestion can't get worse because it is already bad. This is misleading. The Rozelle interchange (as is acknowledged by RM in the EIS) will cause traffic to back up on the City West Link, Victoria Road and in the interchange itself creating congestion and further air pollution for drivers and residents alike.

Discussion on strategic alternatives in the EIS is inadequate and is not evidenced by any analysis or data. RMS state that: *'Individually none of the alternatives would effectively replace the need for Westconnex'*. The EIS fails to assess whether collectively the different alternatives for demand

reduction would make Westconnex unnecessary. This deliberate omission is evidence of how RMS is willfully ignorant about alternatives in proposing this Project.

RMS state that:

'The Crescent, Johnston Street and Ross Street are forecast to experience increased levels of demand with the introduction of the project, with people travelling to and from the southern fringe of the Sydney CBD through the Annandale area.'

The effect of Westconnex will be to increase congestion in these areas, not to reduce it. This is an unacceptable impact. RMS is the custodian of the road network and should not be proposing a project that shifts and increases congestion.

RMS do not compare apples with apples when analysing congestion impacts, as set out below:

- (a) There is no 2033 comparison to the base case, but there is for 2023. The Project should not be approved until this information is made available. The omission of this information again suggests that RMS is willfully ignorant or is concealing information that does not support its case.
- (b) RMS has based their analysis of traffic impacts on the Sydney Gateway being completed but it is not funded and there is no design or modelling. We have no way of knowing how it would be priced. Therefore any modelling or reasoning based on assumptions about the Sydney Gateway should be ignored as a basis for approving this project.
- (c) RMS has based their analysis of traffic impacts on the Western Harbour Tunnel being completed but it too is not funded and there is no design or modelling provided for analysis in the EIS, nor is such information generally available. The public has no way of knowing how it would be priced and whether its business case would stack up; in other words, whether NSW can afford to build it. Therefore any modelling or reasoning based on assumptions about the Western Harbour Tunnel should be ignored as a basis for approving this project.
- (d) RMS have based their analysis of traffic impacts on the Northern Beaches Link being completed but it too is not funded and there is no design or modelling. We have no way of knowing how it would be priced and whether NSW can afford to build it. Therefore any modelling or reasoning based on assumptions about the Beaches Link should be ignored as a basis for approving this project.

RMS should not consider impacts of projects which are simply hypothetical ideas.

Conversely, the EIS contains serious omissions. For example, RMS has not considered the impacts of actual RMS projects such as the King Street Gateway and the Alexandria to Moore St upgrade. The EIS should not be approved until the traffic impacts take into account these projects.

The EIS should therefore be rejected because there are grounds for believing that the traffic modelling is flawed.

The EIS should be rejected on the following further grounds:

- (a) A review of RMS data shows that there has been no actual traffic increase across the network since 2006. RMS should acknowledge this fact and should re-examine the need for Westconnex.
- (b) The treatment of induced traffic in the EIS is misleading. RMS has used its own definition of induced traffic. This tries to hide what the impacts will be. There will be an extra 50,000 plus vehicles a day to the network, not a reduction in congestion as RMS claim.

- (c) The manner in which RMS has modelled the traffic and constraints means that they have ignore the reality and have ignored traffic. The modelling pretends that gridlock doesn't exist.
- (d) The St Peter interchange operational model area does not present a true and accurate picture of traffic impacts. It doesn't take into account traffic impacts that RMS knows will happen. RMS conclude everything will improve but the statistics they provide in the EIS reveal that every intersection in the whole area will deteriorate to level F. RMS argue that this would happen without the Project because traffic will increase over time but this is not the case. RMS own figures show that there has been no overall increase since 2006. Euston Rd service level is to goes from A to F. How is this impact justified? RMS state that Gardeners Road will have to be widened and rebuilt at some stage. This is built to the road line with apartments so exactly how will this occur?
- (e) RMS provide no information on any of the road upgrades they say are necessary and how they will be funded. This is public money that is not in any of the forward estimates so there is no allocation of funds for any those upgrades to happen. In other words RMS are planning to make the roads gridlocked but there is no public money that has been confirmed or even earmarked to fix it.
- (f) It is clear that because of constraints with the network if the tunnels are build they will back up into local streets. It is notable that the demand growth forecast caused the models to become inoperable. As a result, peak hour demand has been understated and the model should not be relied on. Unreleased vehicles are vehicle that can't get onto the road because of congestion. These have been removed from the model because the model could not cope with them.
- (g) It is not clear what the demand reduction used in the model was. There is no explanation as to why RMS believe that demand will reduce. The modelling used as the basis to justify the need for Westconnex and to predict impacts should be rejected.
- (h) RMS predict in the EIS that every intersection within 3km of the St Peters interchange will not work as a result of the Project. RMS propose waiting to see how bad it is after a year. This is not acceptable and the EIS should not be approved until a plan to prevent this congestion is made available. RMS must acknowledge that this Project will cause major congestion in suburbs which will mean that they need to divert traffic. RMS should also acknowledge the impacts on public transport as buses won't be able to move.

SEARS Requirement - Noise and vibration

The EIS discloses unacceptable noise and vibration impacts for those living in the vicinity of the Darley Road site. 11.4.2 states:

'Heavy vehicles involved in construction are expected to travel via existing arterial roads (figures showing spoil haulage routes are provided in Chapter 6 (Construction work)). In all areas evaluated, there are no noticeable increases in noise from construction traffic on the proposed routes during the daytime or night-time.'

The residents adjacent to the truck routes at the Darley Road Civil and Construction site would find this an unbelievable claim. In the EIS, RMS sets out a plan to bring 100 heavy vehicles (trucks) a day in and out of that site, plus 70 'light' vehicles. Most of the properties along Darley Road are modest homes directly adjacent to the Darley Road truck routes. The noise and vibration from truck and dogs will make life in these and other affected homes unbearable and stressful.

It is to be noted that RMS's modelling addresses the worst-case situation when the tunnelling is occurring immediately beneath a sensitive receiver. RMS admits that:

'Exceedance of the night-time criteria has been identified for sensitive receptors near key construction areas, specifically the Darley Road civil and tunnel site (C4) (with exceedance up to four dB (A)) and the Pyrmont Bridge Road tunnel site (C9) (with exceedance up to five dBA).'

Residents near the Darley Road dive site can therefore expect to be exposed to unacceptable impacts, yet very little information has been provided in this EIS about how RMS proposes to proactively manage these impacts. It must be a condition of approval that there be no exceedance of the night time criteria. We further object to the Darley Road civil and tunnel site (C4) at Leichhardt on the basis that:

- (a) There is no clear plan in the EIS for measures that will provide the maximum possible level of mitigation from noise impacts. We also object because there is no clear plan for remedies available to residents who are impacted.
- (b) The proponent's assessment of who are Highly Noise Affected receivers in the area adjacent to the Darley Road civil and tunnel site (C4) at Leichhardt is incorrect and wrongly minimises the actual number of Highly Noise Affected receivers.
- (c) Many residents in Charles St and Hubert St were highly affected by noise from works conducted during the renovation of 7 Darley Rd in 2016. In Hubert St, residents at least as far as No 31 and No 32 Hubert St were affected. The affected properties are not correctly reflected in the EIS.
- (d) It underestimates the number of residents that will be highly affected by noise. It does not take account of the impact of vehicle noise from fully laden spoil trucks driving up the very steep incline from Darley Rd to the City West Link. It does not take account of the noise impact of vehicles using air brakes down the same incline and braking to enter the site.
- (e) The proponent incorrectly asserts that construction traffic is unlikely to result in a noticeable increase in LAeq noise levels at receivers along the proposed construction traffic routes (Darley Road, Leichhardt and City West Link). This does not take account of the impact of vehicle noise from fully laden spoil trucks driving up the very steep incline from Darley Rd to the City West Link. It does not take account of the noise impact of vehicles using air brakes down the same incline and braking to enter the site. The impact of these will be substantial:
 - Commercial trucks are very loud; a standard diesel engine produces approximately 100 decibels (dB) of noise.
 - Engine braking noise can be disturbing both because it is loud and also as it has a distinctive characteristic modulation. Engine braking noise is caused by pulses of gases being emitted from the truck exhaust system, giving a 'machine gun' sound. Engine noise from the trucks approaching the intersection up the grade would be a constant source of annoyance to residents of Darley Road down to its intersection with Charles Street. The independent engineer engaged by the Inner West Council (Jim Holt) reached this conclusion in his report to the Council. SMC have not recognised this impact in the EIS and sent a response to the Council as follows:

'Response: Noise from construction traffic using the public road network is assessed under the Roads and Maritime Noise Criteria Guideline (NCG), which documents Roads and

Maritime's approach to implementing the Road Noise Policy (RNP). Under the NCG, an initial screening test is carried out to determine whether noise levels would increase by more than two decibels (dBA). This represents an increase in the number of vehicles of approximately 60 per cent due to construction traffic or a temporary reroute due to a road closure. Where increases are 2dBA or less, then further assessment is required as noise level changes would most likely not be perceptible to most people. Where noise levels increase by more than 2dBA (i.e. 2.1 dBA or greater) further assessment is required using criteria presented in the NCG.

Darley Road is currently being used by heavy vehicles and light commercial vehicles (construction, delivery etc) that contribute to background noises. The predicted traffic noise increase (dBA) at the Darley Road site is around 0.5dBA.'



SMC's response does not acknowledge this and does not refute Jim Holt's conclusion that residents will be impacted. The response, like the proponent's EIS, fails to acknowledge the true impact of the Darley Road civil and tunnel site (C4) at Leichhardt. You do not need to be an acoustic engineer to know that truck and dogs are very noisy and that local residents will be impacted greatly, especially those close to where trucks will be accelerating and decelerating. Darley Road, Leichhardt is not currently experiencing 14 truck and dog movements an hour during peak time stated in the EIS and an unknown (but presumably greater) number of truck movements within off peak construction hours. This is a truck movement every 3-4 minutes during peak. Assuming that

they will increase truck movements during off peak, residents can expect a truck every 2-3 minutes. We do not need a screening test or assessment to tell us that residents will be subjected to extreme levels of truck noise. The residents of Darley Rd, Francis, Hubert and Charles St have little acoustic protection against the noise of truck engines, exhaust and brakes and none is contemplated in the EIS. Noise and disruption from construction.

We object to the proposal for the Darley Road Civil and Tunnel Construction site at Leichhardt because of the noise and disruption impact it will have on residents during periods of extended construction.

Poor track record of SMC

SMC has a very poor track record of managing the impacts of Stages 1 and 2 of Westconnex. In addition the conditions of approval for Stages 1 and 2 are so broad as to make enforcing compliance with Council or EPA regulations impossible. The protections for residents are ineffectual and the abuse of the Critical State Significant Infrastructure powers is ongoing.

The reality for residents living with the Stages 1 and 2 of WestConnex is night after night of disruption and disturbance with no respite and no way of enforcing compliance. In addition, the policy for mitigation entitlements such as noise protection or respite accommodation is not transparent and is discretionary. Many residents especially the most vulnerable such as those in rental properties or in public housing are unwilling to complain about their situation.

In St Peters in mid-September 2017 the Stage 2 Joint venture's contractors were digging up pipes all one weekend, resulting in two burst water mains. They worked through Saturday night until after 1am on Sunday morning when they should have finished at 6pm on Saturday. Many of the residents were without water for much of the weekend. On Monday night at 8.30pm RMS turned up unannounced with concrete saws and jackhammers. On Tuesday night, RMS were supposed to stop at 6pm but again the work until after midnight. A resident whose bedroom was right next door to the work, posted a video of the deafening concrete saws in use after midnight with the caption "It's impossible to live here at the moment".

Many local residents are unaware of the construction impacts and that there will be months of construction work which will have to take place out of hours. The EIS does not specify which works to establish the site will take place during standard construction hours.

The Department of Planning should oppose the approval of the Darley Road site at Leichhardt because alternatives are available which will have less impact on residents or which will impact fewer residents during the construction phase. These alternatives should be assessed. If not suitable then the proponent must do without a dive site. It is not acceptable to treat communities like this. The mistakes of Stages 1 and 2 should not be repeated.

The Department of Planning should ensure that the conditions of any approval are stringent and prohibit out of hours work at the Darley Road Civil and Tunnel Construction site at Leichhardt for more than 2 nights in a row and in any two week period. The proponent should be required to pay a predetermined amount of ex gratia payment to residents for each night of disturbance, which is sufficiently high to deter extended periods of out of hours work at all proposed construction sites of the Project.

Access tunnel

RMS has failed to advise what the noise and vibration impacts will be on residents of James Street from the access tunnel which is to run down the middle of this street both as it is tunnelled and when it is in operation. In fact there is little more than a rough drawing of its approximate alignment provided, with no detail of tunnel depths provided, nothing about the period of its operation or even the location from where tunneling will start. The access tunnel will be used to bring spoil up to the surface by trucks 24/7. For how long and with what impacts - no one knows as the EIS doesn't address these critical matters.

Night works

RMS state 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 during daytime, it is likely this will be used as a justification for frequent night work (EIS, 6.4). This will create an unacceptable impact on residents. It is unacceptable that a highly unsuitable site has been selected and instead of a proper plan to manage traffic, the EIS contemplates and allows work to simply occur at night. This is objected to in the strongest terms.

RMS states that at two (unspecified) residential locations: *'night-time ground-borne noise is predicted to exceed the criteria by 10 dBA or more'*. At these receivers, additional mitigation measures have been identified that include providing individual briefings on impacts and mitigation measures, providing respite periods, and alternate accommodation.

Best practice would be for RMS to have provided the EIS in a format which allowed residents to see the impacts for them. There must be agreed rules before the Project begins governing how long excessive noise can go on for (no more than 2 hours for example) and who is entitled to what. RMS should pay for affected residents to install double glazing, noise insulation and air conditioning where necessary. Again the Crossrail project in the UK has a transparent process for managing noise and vibration impacts which RMS should be required to replicate and adopt.

Hours of operation

We object to the EIS because it is effectively a 24-hour operation, despite the fact that the proponent represents that spoil removal from this site would only occur within standard construction hours. The EIS states in 6.5.8 Darley Road civil and tunnel site (C4):

'Spoil handling associated with tunnelling supported by the Darley Road civil and tunnel site would occur 24 hours a day, seven days a week. Spoil would be handled below ground wherever practicable to reduce the potential for amenity impacts in adjacent areas. Spoil handling at the surface outside standard daytime construction hours would occur within an acoustic shed to manage potential amenity impacts. Spoil removal from this site would only occur within standard construction hours, between 7.00 am and 6.00 pm Monday to Friday, and between 8.00 am and 1.00 pm on Saturdays.'

The EIS allows for the possibility of spoil handling above ground 24 hours 7 days a week. The EIS fails to assess or explain the impacts of this on the residents in nearby streets. These impacts could include construction noise, light and heavy vehicles (other than spoil trucks), workers arriving for shifts and leaving after shifts. It is not clear to what extent the acoustic shed will contain noise. The Jim Holt report stated that the acoustic shed would not operate effectively due to its location on the site. It is not clear whether the proponent will mandate the contractor to employ the highest level of acoustic protection rather than what is feasible.

The EIS states in 6.5.8 Darley Road civil and tunnel site (C4):

'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. Local residents, businesses and the NSW EPA would be kept informed about works outside standard daytime construction hours at the site.'

We object to the EIS because the proponent/contractor would only be required to keep local residents, businesses and the NSW EPA informed about works outside standard daytime construction hours at the site. Local residents, businesses and the NSW EPA would have no right to limit works outside standard daytime construction hours at the site. As we have seen with other stages of WestConnex this leads to devastating impacts for residents who must endure significant periods of exposure to out of hours works which involve noise, lights and disturbance.

The proponent should be directed to abandon its plan for a dive site as it is clear impacts are too great for the community. At the very least the site should be restricted to standard construction hours for all operations above ground and there should be no shifts commencing or ending outside of standard construction hours. The proponent should be directed to find a site where its operations will not impact on residents outside of standard construction hours. The proponent should be directed to find a site where its operations will not impact on residents outside of standard construction hours.

Mitigation proposed

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

We therefore object to the EIS on the ground that the proponent has not provided details of the noise mitigation measures proposed in relation to the Darley Road civil and tunnel site (C4) at Leichhardt. As a result it is not possible to assess the noise impacts of the proposal. It is completely unacceptable for the proponent to establish a major construction site in the middle of a residential area without a clear plan for mitigating noise impacts.

Acoustic barriers and devices

The EIS states in 6.5.8 Darley Road civil and tunnel site (C4) that:

'Acoustic barriers and devices at the access tunnel entrances would be considered and implemented where reasonable and feasible to minimise potential noise impacts associated with out-of-hours works within the tunnels. In addition, temporary noise mitigation measures may include noise barriers and other temporary structures such as site buildings, which would be provided to minimise noise impacts on surrounding properties.'

The approval document needs to mandate that all of these measures are implemented. The acoustic shed that is considered for Darley Road (and other construction sites) offers the lower grade noise protection. This is despite the fact that 36 'sensitive receivers' at Darley Road 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 as shown in fig. 6-20 below. 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 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.

Darley Road civil and tunnel site (C4) will create a high level of noise impact for residents yet the proponent has not given details of the plan for mitigating this impact. The measures will be implemented only if 'reasonable and feasible' which is a subjective assessment as it does not state whether they will be assessed as reasonable from the standpoint of the proponent or the residents. What the proponent thinks is reasonable may not meet the residents' expectation as to what is reasonable. The measures appear to be optional as the proponent only states that that *'may include noise barriers and other temporary structures such as site buildings'*.

We note the following further failures to comply with the SEARS:

- The proponent has not provided a clear plan for measures that will be taken to minimise noise impacts from work within and outside of standard construction hours at the Darley Road civil and tunnel site (C4) at Leichhardt.
- The proponent has failed to take account of the fact that the demolition of the Dan Murphys building will remove a significant barrier to traffic noise from the City West Link. This will mean increased traffic noise impacts to the residents of Darley Rd, Francis St, Hubert St and Charles Street.

- The proponent has failed to take account of the noise impact of fully laden spoil haulage trucks exiting the Darley Road civil and tunnel site (C4) at Leichhardt driving up the very steep blind turn at the intersection with the City West Link. The RMS should install noise measuring equipment and monitoring cameras at this location to measure noise from heavy vehicles and identify vehicles whose noise that exceeds the applicable Australian standard.
- The proponent has failed to take account of the noise impact of spoil haulage trucks using air brakes on the descent down Darley Rd off the City West Link. Heavy vehicle drivers should avoid using exhaust brakes, engine compression or 'jake' brakes near residential areas and noise-sensitive areas such as hospitals and schools, unless they are necessary for safety reasons. RMS should implement noise limits from engine compression brakes and should use roadside noise 'cameras' as an aid to enforcement as vehicles emitting engine compression brake noise might affect nearby communities.

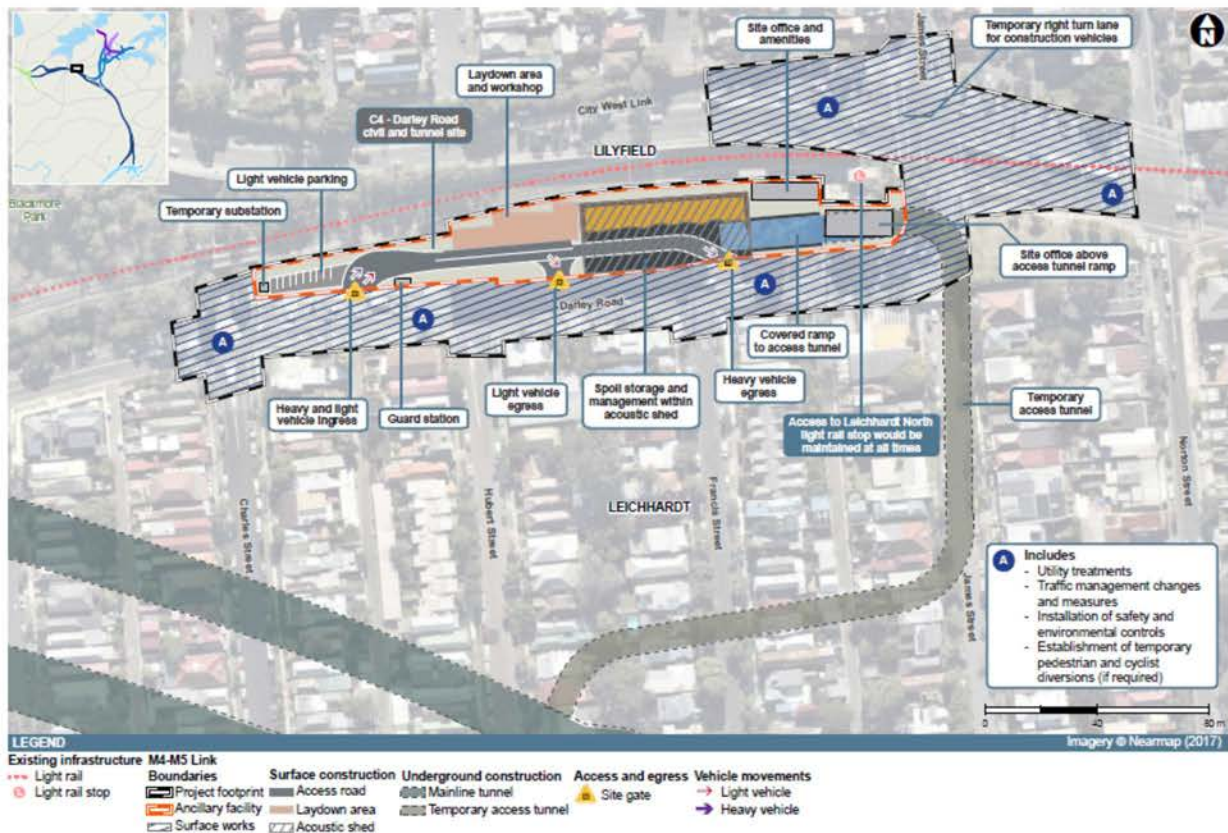


Figure 6-20 Indicative Darley Road civil and tunnel site (C4) layout

6-54

Constant out-of-hours work expected and permitted

The EIS states that '*some surface works*' would need to be carried out out-of-hours '*to minimise traffic disruptions or for safety or operational reasons*'. Given that Darley Road is a known accident black spot and is highly congested, particularly at peak periods, it is likely that there will be frequent out-of-hours work. This will create an unacceptable impact on those living close to the Darley Road site. In addition, it is likely to lead to additional road closures and diversions, placing pressure on the local traffic network. The EIS as drafted effectively permits out of hours to be undertaken whenever this is convenient to the contractor (Executive Summary xiv). No out-of-hours work should be permitted except in the case of a true emergency.

Unacceptable construction noise levels

The EIS states that construction noise levels would exceed the relevant goals without additional mitigation. Activities identified include earthworks, demolition of existing structures and site establishment and utility adjustments. Those near the Darley Road site will suffer unacceptable construction impacts due to the need to demolish the large Dan Murphy's building. The EIS notes that 10 weeks of demolition and road adjustment works will be needed. There are no additional mitigation measures proposed for residents during this period such as temporary relocation, noise walls or treatments for individual homes. 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 (Executive Summary, xiv). We object to the selection of this site on the basis that the works required (demolition and surface works) will create unbearable noise and vibration impacts and make over 36 homes unlivable and there are NO additional mitigation plans for these residents. As stated we believe that RMS has underestimated the true number of homes near Darley Road affected and the Department of Planning should not approve the Darley Road site on this basis.

The proponent has identified that the most affected receivers are residential receivers which adjoin the Darley Road civil and tunnel site (C4) on Darley Road between Norton Street and Falls Street. The most noise affected receivers are located between Charles Street and Norton Street due to their proximity to the construction site.

The proponent has identified that the *worst case construction scenario* will occur during

- Road adjustments works
- spoil handling works within the acoustic shed during all works periods

Highest construction noise impacts:

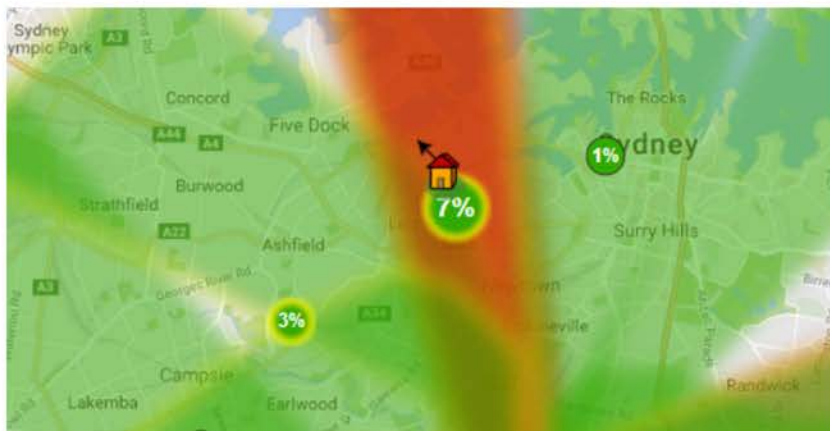
- Use of a rock breaker during the daytime period as part of the demolition works and
- Use of a road profiler during the night-time period as part of the road adjustment works

We object to the EIS because the proponent provides that spoil handling works within the acoustic shed will take place for the duration of the construction phase which could be up to two to three years duration, yet there is no clear plan for measures that will be taken to minimise noise impacts.

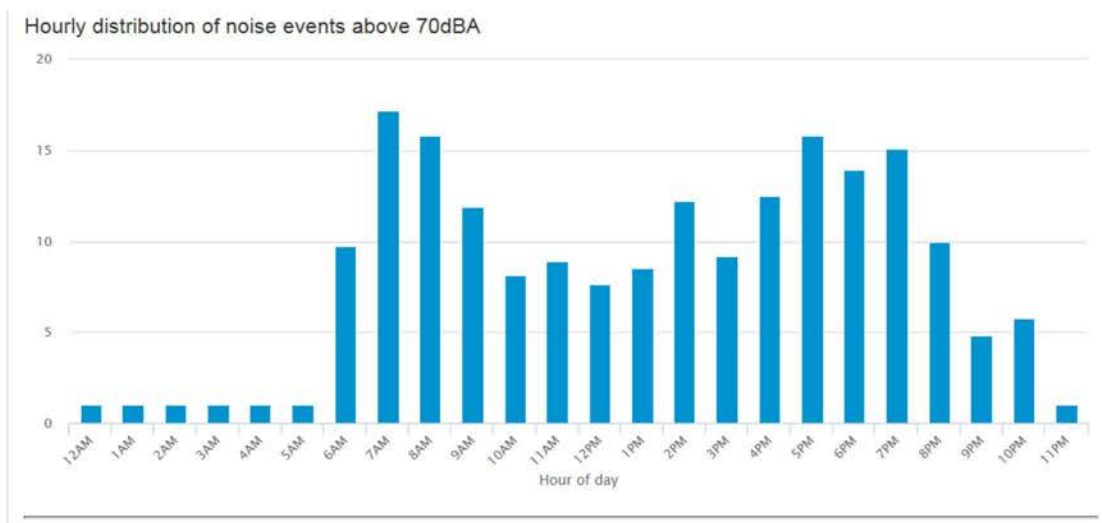
We object to the Darley Road civil and tunnel site (C4) on the basis that there is no clear plan in the EIS for measures that will provide the maximum possible level of mitigation from noise impacts. We also object because there is no clear plan for remedies available to residents who are impacted.

No mention of cumulative effect of aircraft noise - Leichhardt and St Peters

We object to the EIS because the proponent has failed to take account of the cumulative impact of its proposed Darley Road, Leichhardt civil and tunnel site operations and the aircraft noise which the residents near the site already endure. The extract from Webtrak (**below**) shows that Darley Road, Leichhardt and adjacent streets are directly under the flight path.



Airservices Australia reports that in April to June 2017 the number of average daily noise events over 70 dBA. In Leichhardt this is an average of 16- 17 per hour over the peak morning period and 16 per hour in the early evening peak period.



The above extract from Webtrak shows that Darley Road, Leichhardt and adjacent streets are directly under the flight path.

Airplane exhaust, like car exhaust, contains a variety of air pollutants, including sulfur dioxide and nitrogen oxides. Many of these particles of pollution are tiny, about a hundred millionths of an inch

wide, or smaller than the width of a human hair. So-called particulate matter that's especially small is the main culprit in human health effects, especially since the particulates can become wedged deep in the lung and possibly enter the bloodstream, scientists say.

Exposure to loud noise from living under a flight path over a long period of time may increase the risk of developing high blood pressure or having a stroke, a 2013 study by researchers at the University of Athens suggests. Researchers examined data from 420 people living near busy Athens International Airport in Greece and found living with high noise levels from aircraft, especially at night, was associated with high blood pressure. Every additional 10 decibels of night-time aircraft noise appeared to result in a 69 per cent increased risk of high blood pressure, also known as hypertension.

The researchers at the University of Athens found that around half the participants (just under 45 per cent) were exposed to more than 55 decibels of daytime aircraft noise, while around one in four (just over 27 per cent) were exposed to more than 45 decibels of night-time aircraft noise.

Only around one in 10 (11 per cent) were exposed to significant road traffic noise of more than 55 decibels. Between 2004-6 and 2013, 71 people were newly diagnosed with high blood pressure and 44 were diagnosed with heart flutter (cardiac arrhythmia), while a further 18 had a heart attack, the researchers found.

The International Civil Aviation Organization (ICAO) is a UN specialized agency, established by States in 1944 to manage the administration and governance of the Convention on International Civil Aviation (Chicago Convention). It recognises that aircraft emit pollutants which are a risk to public health (<https://www.icao.int/environmental-protection/Pages/Contaminants.aspx>). The following contaminants are emitted during the different phases of aircraft operation:

NITROGEN OXIDES (NO_x) – which includes nitrogen oxide (NO) and nitrogen dioxide (NO₂)

CARBON MONOXIDE (CO)

SULPHUR OXIDES

PARTICULATE MATTER (PM) – which leaves the exhaust as carbon black soot

VOLATILE ORGANIC COMPOUNDS (VOCS) – such as benzene and acrolein

OZONE (O₃)– which is formed from the nitrogen oxides and volatile organic compounds emitted

SEMI-VOLATILE ORGANIC COMPOUNDS (SVOCS)

METALS

The EIS should not be approved because RMS has failed to assess the cumulative impact of aircraft emissions and emissions that will be generated by the project. There has been a noted increase in lead found in Inner West gardens and of course aircraft fuel contains heavy loads of lead. References can be found at:

<http://www.lead.org.au/Lanv7n3/L73-4.html>

<https://www.icao.int/environmental-protection/Pages/Contaminants.aspx>

<https://www.scientificamerican.com/article/lead-in-aviation-fuel/>

<http://www.sciencedirect.com/science/article/pii/S0967070X14000547>

http://ac.els-cdn.com/S0967070X14000547/1-s2.0-S0967070X14000547-main.pdf?_tid=1fced014-7d8a-11e7-bd89-000

We object to the plan for a construction site on Darley Road because:

- (a) In addition to the existing aircraft emissions and noise experienced by people living near the site, this will mean an additional cumulative impact of spoil truck diesel exhaust emissions and noise every 4 minutes in peak hour based on number of truck movements per hour and in excess of every 4 minutes per hour in non peak permitted construction hours. This will give rise to increased health risks from noise and air pollution which research suggest will cause increased blood pressure and risk of stroke.
- (b) The proponent has failed to take account of the cumulative impact of emissions from spoil truck vehicles from it proposed Darley Road, Leichhardt civil and tunnel site operations and emissions from aircraft to which residents near the site are already exposed.

Failed mitigation in Stages 1 and 2 of Westconnex

The mitigation and management measures proposed by RMS are inadequate and clearly have failed affected communities such as Haberfield and St Peters. It is also noted:

- RMS plans to validate predicted impacts from the noise and vibration modelling (which is based on a conservative worst-case assessment) – in other words once the residents have been subjected to these impacts they will take a look at it. This is unacceptable.
- RMS plans to notify the community of noise impacts anticipated at specific times. In the past RMS or its contractors are only required to notify residents many months before. The noisy work then comes as a shock to many. It is unacceptable for RMS not to set out clearly and transparently the rules which it must follow. The Crossrail project in the UK has a transparent process for managing noise and vibration impacts which RMS should be required to replicate and adopt.

Inner West Subsurface Interchange - Noise and vibration impacts

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

The EIS states the Inner West Interchange would be under 3 suburbs - Lilyfield, Annandale and Leichhardt – so clearly it would cover a very extensive area (see map in EIS Vol 1A Chap 5 Part 1 p11) with drilling and danger of subsidence affecting hundreds of homes. Map 2 in Vol 1A Chap 5 Pt 1 shows four intersecting tunnels, each 3 lanes wide, with four toll locations, apparently converging under Mayes, Young, Ferris, Moore, Catherine, Hill, John, Emma, Styles, Ilka, Paling, and the many other surrounding streets.

The construction of four intersecting tunnels at varying depths in a spaghetti junction network would exacerbate ground settlement and vibrations, and cause homes most of which are Federation or

earlier above the Interchange to be seriously impacted. Scant detail is provided in the EIS as to how this risk will be minimised or indeed the degree of such risk.

Transport and Traffic issues - Darley Road Leichhardt

There are many issues with the traffic and transport component of the EIS generally and as pertains to Darley Road. The EIS states in 6.5.8 Darley Road civil and tunnel site (C4) that:

'It is anticipated that the majority of construction traffic would enter the site from the southern (westbound) carriageway of Darley Road, Leichhardt via new driveways. Heavy vehicles associated with spoil haulage would travel eastbound on City West Link and turn right into Darley Road, Leichhardt. A temporary right turning lane at the intersection of City West Link and Darley Road, Leichhardt would be provided for use by construction vehicles. Heavy vehicles would exit the site by turning left onto Darley Road, Leichhardt before turning left onto City West Link.'

'Construction traffic may also access the Darley Road civil and tunnel site (C4) via the westbound lanes of City West Link.'

'Temporary traffic management measures would be established to enable access and egress arrangements. These would be detailed in a CTAMP, which would be prepared to manage construction traffic associated with the project.'

We object to the proposal for vehicles associated with spoil haulage to travel eastbound on City West Link and turn right into Darley Rd. This proposal is dangerous and the impacts and risks are too great. Darley Road is acknowledged by RMS to be a sub-standard road in terms of its construction. The intersection from the City West Link is a steep blind turn even for traffic coming across from James St. This is followed by immediate left hand turns into both Francis St and Hubert St. A number of properties on Darley Rd would be at risk of destruction from spoil haulage trucks in the event of a truck having to brake suddenly to avoid stationary vehicles.

New right hand turning lane on the City West Link to James St

We object to the Civil and Tunnel Construction site at Darley Road Leichhardt because the proponent is planning to create a right hand turning lane on the City West Link to allow construction vehicles to turn right into James Street. This is a dangerous proposal given that it involves turning into a steep blind corner which carries a high degree of risk of collision with oncoming vehicles and with pedestrians including the many school children who cross James St at this point.

It is reckless beyond belief to plan for large number of truck and dogs to make a right hand turn into James St from the City West Link. Even vehicles crossing the City West Link from the Lilyfield Rd side of the City West Link have a higher risk of collision or error due to the steep blind turn. This would be even higher when making a right hand turn into James St from the City West Link.

This intersection is reported as being the third most dangerous for accidents in the Inner West. The proponent should abandon a dive site completely or find a location directly on the City West

Link where spoil trucks will never use local roads. Why should residents lives be put at risk because the Project must be delivered as soon as possible?

Safety and accident risks posed by use of Darley Road

We object to the proposal to the Darley Road civil and tunnel site because of the unacceptable risk it will create to the safety of our community. The traffic forecasts in the EIS state that Darley Road will have 170 heavy and light vehicle movements a day. We note that this is a forecast only and SMC has acknowledged that the number of movements may be higher. We object to the EIS because the proposal that *'heavy vehicles associated with spoil haulage would travel eastbound on City West Link and turn right into Darley Road'* presents unacceptable safety and amenity impacts.

The corner of Darley Rd (actually James St) and the City West Link is a pedestrian and active transport zone for:

- Pupils of Orange Grove Public School who live in Leichhardt
- Commuters who board at Leichhardt North light rail stop
- Students of Sydney Secondary College, Leichhardt Campus who alight at Leichhardt North light rail stop
- Students of many other schools along the light rail who board at Leichhardt North light rail stop
- Pedestrians and cyclists accessing Blackmore Oval (junior rugby club), the Bay Run, the large off-leash dog park and the many children' playgrounds along Hawthorne Canal
- Residents walking to Leichhardt Park Aquatic Centre and adjacent sporting facilities
- Cyclists accessing the cycle network on the Bay Run

The proponent's plan brings pedestrians, and school children in particular, directly into the path of spoil haulage trucks at an intersection found to be the third most dangerous, according to Transport for NSW figures. A further impact will be to discourage people from walking or cycling in this area leading to greater car use for local trips.

The selection of Darley Road as a dive site has been publicly opposed by the Inner West Council and its traffic planners in the strongest terms, with numerous representations made to SMC opposing its selection (See **attached** media statements issued by the Council). This is because Darley Road is a known accident and traffic blackspot and because it is clear that the movements of hundreds of trucks a day in this location will create an unacceptable risk of accidents. The Site has long been acknowledged by the Council as a traffic black spot as disclosed in several Council Reports. The Inner West Council's own 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. One report dated 21 August 2007 headed 'DARLEY ROAD LEICHHARDT PEDESTRIAN AND TRAFFIC SAFETY ISSUES' (2007 Report) points out serious issues with Darley Road:

“Darley Road, Foster Street and Tebbutt Street have not been constructed to contemporary engineering standards with respect to cross falls, sight distances and horizontal alignment and the impact of vehicles using this route causes a number of safety concerns for residents. Given the speed, volume and nature of the vehicles using Darley Road it is difficult for many people to cross the road, especially at peak hour. The northern side of Darley Road provides the Leichhardt area with a large area of recreational open space, children’s playgrounds and community facilities which is difficult and unsafe to access.”

The Council’s accident data for the six-year period (1 January 2001 until 21 December 2006), as provided in the 2007 Report (page 4) is extracted below:

Location	Accidents	Injuries
Cnr of Tebbutt and Kegworth	2	1
Cnr of Foster and Hawthorne	1	1
Cnr Foster and Lords	11(9- ped)	11
Cnr Foster and Marion	41	26
Cnr Foster and Walter	3	1
Cnr Foster and Allen	3	1
Cnr Darley and William	3	1
Cnr of Darley and Elswick	1	1 fatal
Cnr Darley and Charles	6	4, 1 fatal
Cnr Darley and Hubert	1	1
Cnr Darley and Francis	2	
Cnr of Darley and James	1	
Mid block along Darley and Foster	23	9
Total Accidents	98	56 Injuries & 2 fatalities

You will note that there have been two fatalities and several serious accidents in a five-year period at roads adjacent to the Site. While some traffic calming measures were introduced (partial closure of Elswick Street), Darley Road remains acknowledged by the Council’s strategic traffic planners as hazardous.

We have been provided with further accident documentation by Ken Welsh, (Strategic Traffic Planner, Inner West Council) and it indicates that a large number of accidents have occurred near the Site since 2006, including on the streets adjacent to Darley Road and also at the James Street intersection. With respect to the James Street intersection, the proposal by SMC would involve hundreds of trucks a day turning at this dangerous location, while permitting a dangerous right-hand turn into James Street.

This intersection, on TfNSW’s own statistics, is the third most dangerous intersection in the inner west:

<http://www.dailytelegraph.com.au/newslocal/inner-west/crash-and-injury-figures-reveal-worst-black-spots-in-the-inner-west/news-story/56e7f60740b31ad8f3eaf21bc581cb46>

Crash statistics – City West Link and James St intersection

It is also significant to note that the EIS only provides analysis of crash statistics near the proposed 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 needs to detail the increased risk in crashes that will be caused by the additional 170 vehicles a day that are proposed to enter and leave Darley Road during the construction period. Its failure to do so renders its analysis of impacts misleading and inadequate.

Development Application refusal for Darley Road

The history of the Darley Road site confirms these safety and accident risks. On 5 December 2006 the Building & Development Council of Leichhardt Council refused Development Application D/2006/311 in relation to 7 Darley Road, which was an application for alterations and additions to existing building and change of use of existing building for use as a liquor store, cafe/deli and commercial office space, new landscaping and signage. The former Leichhardt Council repeatedly and over several years refused the application for use of the Site on safety and traffic issues – and when it was ultimately approved by the Court, there were several key conditions imposed to address these concerns.

The Council found that the projected extra vehicles of Thursday evening (150 per hour), Friday evening (156 per hour) and Saturday midday (228 per hour) meant that *“the proposal is considered unsatisfactory when having regard to traffic and parking impacts.”* One of the bases of refusal by the Council therefore was:

“Traffic and parking impact on Darley Road and the surrounding residential street network/vehicular – pedestrian conflict, especially with school children/ increase noise from traffic movements and truck loading and loading.”

The use of the Site as proposed will mean that these traffic and safety matters will not be able to be managed, as proposed by the Court. For example, the Court prohibited the use of trucks longer than 11 metres - this will be regularly breached if converted to a construction site. Hundreds of local residents had lodged objections to the DA. One of the grounds on which the application was refused was that the RTA did not support the access arrangements and would not allow right hand turns into the site, which is precisely what the proponent is now proposing.

The following extract from the decision sets out why the RTA objected to the DA:

“The application has proposed a number of traffic management measures along Darley Road, included painted median islands.

The RTA does not support the access arrangements as proposed and has advised that it is likely to create conflicts at the shared entry/exit near Hubert Street. It has been recommended that

there be separate entry and exit driveways, with the entry nearest to Charles Street, and the exit at the driveway crossing near Hubert Street.

The RTA has advised that these driveways must be physically restricted with left-in/left-out movements through the provision of 900mm wide concrete median islands, covering the width of each driveway and extend to a distance of 10 metres either side of each driveway crossing. The parking area along the eastern section of the site must also be restricted to left-in/left-out movements.

On the advice of the RTA, no right-turn into the site is then possible, potentially encouraging west-bound traffic on Darley Road to conduct 'U-turns' at the Charles Street intersection to access the carpark, creating a conflict at that point.

Council's engineers have advised that the proposed traffic management works on the Darley Street frontage have a number of deficiencies including:

- Traffic lanes on the southern side of Darley Street would be relocated onto the existing parking lane which is geometrically unsuitable and unsafe for vehicular traffic.
- The proposed kerbside traffic lane on the southern side of Darley Street would conflict with existing stormwater drainage inlet structures. Significant drainage works would be required to address this issue without exacerbating existing flooding problems in this area.

Advice from the RTA has also noted the unsuitability of the existing kerbside parking and bicycle lanes for a through lane due to its cross-fall.

The RTA have further advised that the bicycle lane along Darley Road must be retained, and that no objections are raised to the proposed pedestrian refuge, subject to compliance with the relevant Australian standards. "

The RTA also raised objections in relation to traffic that the bottleshop development would generate:

"It is expected that the peak traffic generation periods for the development would be Friday evenings and Saturdays, with Thursday evening also busy. Conflict with the morning peak hour is therefore expected to be limited. It is noted that the traffic surveys were conducted prior to the closure of Moore Street West, Leichhardt.

Anecdotal evidence has suggested that traffic flow has increased on east-west thoroughfares such as Darley Road and Marion Street since the closure.

Traffic generation figures supplied in the traffic report initially submitted to Council were derived strictly from the amount of car parking provided on the site.

The revised traffic generation figures provided as a result of the additional parking provided on the site. It has factored that 35% of traffic to the site are passing trips. It has not accounted for spill-over traffic that cannot be accommodated on the site.

These figures would appear to conflict with statement within the Social Impact Assessment (SIA) that was submitted to the LAB for approval. This document indicates that the 'catchment' for the proposed liquor outlet is considerably larger and it states "In contrast Dan Murphy's OLR's are larger format destination stores designed to appeal to a regional market ..."

It has also been noted that the proposed liquor store alone would expect up to sixty (60) deliveries a week.

The study derives that the likely additional traffic on the local network would be:

- Thursday evening – some 150 vehicles/hour (in + out)
- Friday evening - some 156 vehicles/hour (in + out)
- midday - some 228 vehicles/hour (in + out)

Of particular concern in this regard is that the 'No stopping' restriction required by the RTA for the northern side of Darley Road during the Thursday and Friday evening peaks, which may funnel overflow parking into the surrounding residential streets. Furthermore, the substantial increase in traffic flow at the Saturday peak may result in significant queuing at the City-West intersection as all vehicles are forced to left-turn exiting the site.

On the basis of the above, the proposal is considered unsatisfactory when having regard to traffic and parking impacts."

It is clear that the same traffic impacts raised by the RTA will be a consequence of the Darley Road Civil and Tunnel Construction site at Leichhardt - yet the proponent has failed to provide any detail about these impacts will be managed. The same deficiencies are present in the proponent's EIS as that presented to the Court and should therefore be rejected on the same grounds. We note in particular:

- Construction trucks travelling on the southern side of Darley Road will force traffic onto the existing parking lane which is geometrically unsuitable and unsafe for vehicular traffic.
- The construction works will conflict with existing stormwater drainage inlet structures which will exacerbating existing flooding problems in this area.
- The access arrangement for the site will create traffic conflict at the shared entry/exit driveway near Hubert Street.
- The application would result in the loss of on-street parking spaces on the southern side of Darley Road.
- There is no traffic management proposal.
- The proponent has failed to demonstrate how the existing bicycle lane would be maintained.
- The proponent has failed to demonstrate that the proposal would not have an undue increase in traffic generation along Darley Road and the surrounding residential street network.
- The proponent has failed to adequately address the impacts from vehicle queuing in Darley Road.
- There is no detail as to how (both access points) to the Light rail will be maintained and how access will be made safe.

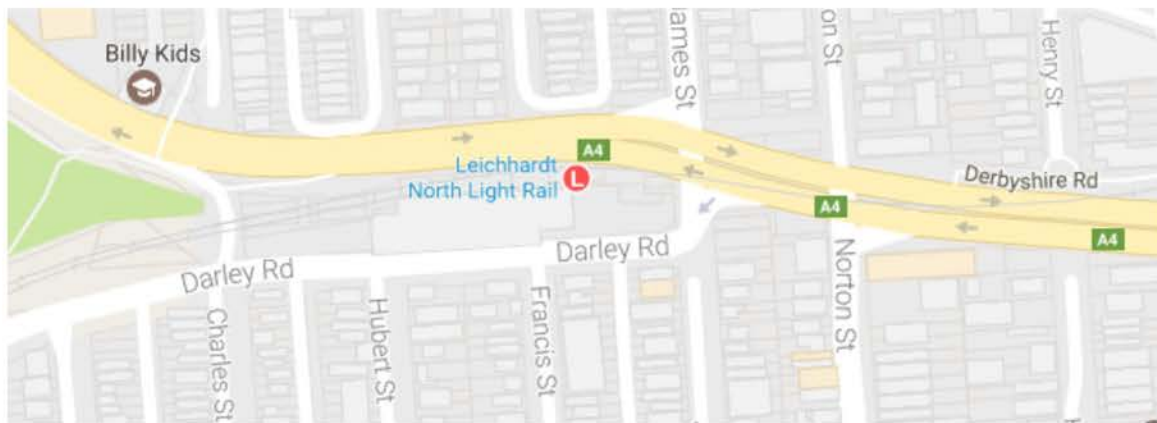
Traffic data is out of date

We also note that Darley Road has experienced a dramatic increase in traffic over the past 6 months, most likely caused by the extensive building development work in the area and overflow heavy vehicle traffic from nearby WestConnex construction sites in Haberfield. This increase in traffic on Darley Road renders any earlier traffic analysis commissioned by SMC as to the viability of the Site as redundant. Up to date traffic data and analysis is urgently required.

Impact on traffic and the road network

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.

See image **below** which depicts the location of Darley Road and Norton Street relative to the City West Link:



The Project will worsen traffic near the Darley Road during and after construction

The EIS discloses that during construction westbound traffic will increase on Darley Road by 37%. This increase in traffic for a period of up to five years will make it hazardous to cross the road and access the light rail and travel to Blackmore Oval, the Bay Run, the dog park and the Leichhardt pool. In addition, it will drastically increase both local traffic and outer area traffic at peak commute times. We therefore object to the location of this site based on the unacceptable traffic impacts it will have on road users and on pedestrians.

Failure to properly assess construction, transport and traffic impacts

We 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 route identification and scheduling of transport movements, particularly outside standard construction hours.

Management of potential impacts

The EIS states that a Construction traffic and Access Management plan (CTAMP) would be prepared to minimise delays and disruptions and identify changes to ensure road safety. The plans are not in the EIS so residents cannot comment. What guarantee is there that the plan will be effective? The EIS should be rejected on the basis that the impacts on traffic and safety are not adequately addressed. It is also inadequate to simply refer to a plan, with no provision for residents and other key stakeholders to be involved in its development and no assurance it can work.

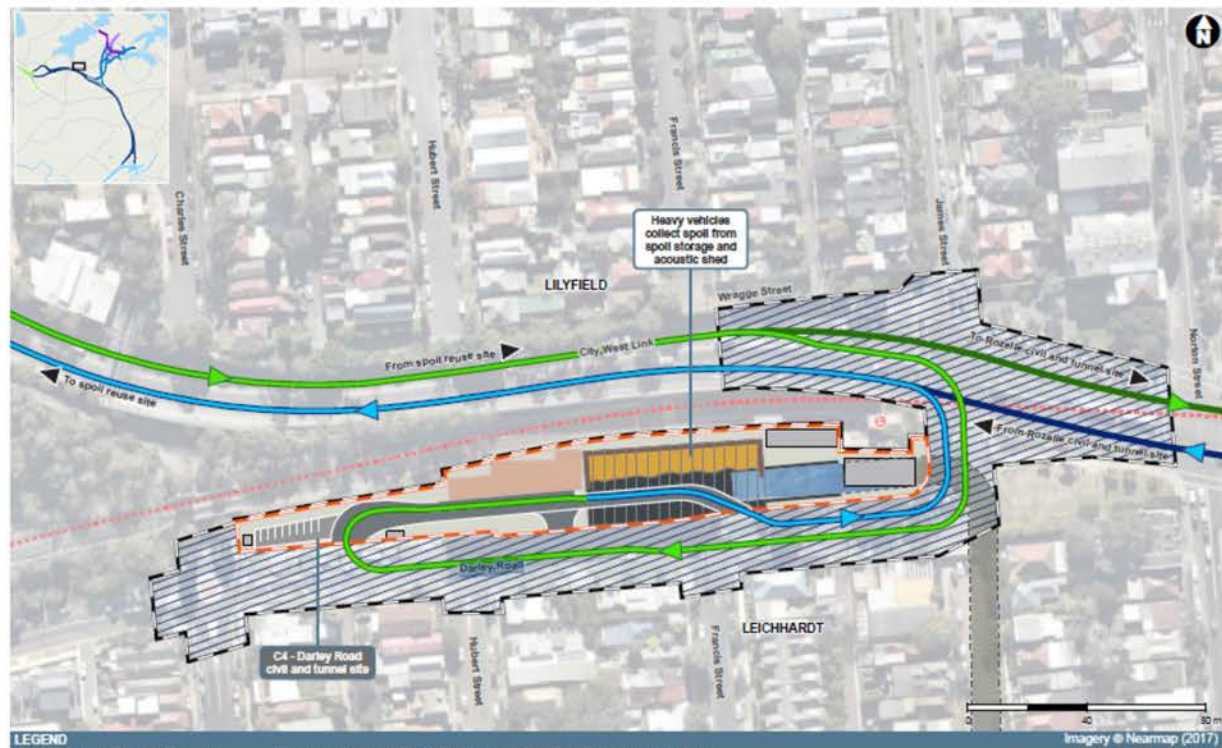


Figure 6-28 Indicative spoil haulage route – Darley Road civil and tunnel site (C4)

6-88

[proposed spoil truck movements at Darley Road above]

Truck Movements

Proposed truck routes

The EIS provides that all trucks will arrive at the Darley Road site from Haberfield and travel along Darley Road to the site, with a right-hand turn now permitted into James Street. The proposed route will result in a truck every 3-4 minutes for 5 years running directly by the modest houses on Darley Road. These homes will not be habitable during the five-year construction period due to the unacceptable noise and vibration impacts. The truck noise will be worsened by the truck's need to travel up a steep hill to return to the City West Link; therefore, the noise impacts will affect not just those homes on or immediately adjacent to Darley Road. The proposal to run trucks so close to homes is dangerous and highly intrusive to residents. 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.

Alternative spoil haulage route not analysed

Peter Jones (SMC) has on many occasions made public representations to the community that his plan is to stage trucks from the port and eventually when possible to have them arrive and depart from the site underground when a tunnel is established between Leichhardt and the M4 East. He has also stated that loading of spoil would take place underground at this time. He has recently told LAW of his new plan to load trucks from a ramp off the City West Link by means of a hopper conveyor which would pass over the Light rail station delivering spoil into silos below which trucks would pull up to receive their load. The laden trucks would then travel west bound along the city west link. **None** of this plan is detailed in the EIS.

The proponent has failed to assess the impacts of **all** the spoil haulage routes to and from the sites that SMC is considering. These include the option of staging trucks from Sydney Ports at James Craig Rd, creating an off-ramp from the City West Link near North Leichhardt Light Rail and running trucks underground in established tunnels. These spoil haulage routes will have different impacts from the proposal contained in the EIS and the proponent is obliged to identify them. We object to the fact that we are denied the opportunity to assess the impacts of all options. We also object to the fact that the public will have no right or opportunity to have input into the CTAMP, PIR or AFMP on matters which will have a devastating impact on residents near 7 Darley Road.

The proponent only provides details of light and heavy vehicle volumes predicted to arrive and depart from construction ancillary facilities like the Civil and Tunnel Construction site at Darley Road Leichhardt during a typical AM peak hour, PM peak hour and daily period. This is an insufficient amount of information about the impacts. It does not make it clear what the impacts will be during the course of the Project. It does not make it clear what the impacts will be during non typical hours and during non peak hours.

We are also concerned that the proponent is understating the impact of vehicle volumes by only providing information on typical AM peak hour, PM peak hour and daily period. What is typical is a subjective assessment. Leichhardt might end up with greater vehicle volumes and greater impacts because the EIS has been approved on the basis of typical AM peak hour, PM peak hour and daily period.

Lack of detail of vehicle movements

The proponent and its agent SMC are already undertaking identical operations at other tunnelling locations for Stages 1 and 2 of WestConnex and should be able to provide more detail about what the vehicle volumes will be at each stage of the project. The proponent should be in a position to provide more than just typical volumes and more than just peak hour volumes. The proponent should know how many vehicles will be arriving and departing from the site on an hourly basis at the various stages of the project. The proponent should describe what a typical day would look like hour by hour in terms of vehicle arrivals and departures at specific points in the project. The proponent should also describe what a non-typical day would look like and what might cause a non-typical day to occur.

We object to the Civil and Tunnel Construction site at Darley Road Leichhardt because the

proponent has failed to provide sufficient detail about vehicle volumes to enable a meaningful assessment of the impacts.

CTAMP

We object to the EIS because it fails to describe the truck route options available to the proponent in relation to the Darley Rd site and instead allows for the final plan to be detailed in the CTAMP, Preferred Infrastructure Report or Ancillary Facilities Management Plan.

All of the streets abutting Darley Road identified as NCA 13 (James Street to Falls Street) should have a blanket prohibition on any Project 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. These streets are not constructed for heavy vehicle movements and on this basis should also be ruled out. The EIS needs to prohibit outright truck movements including parking) and worker parking on all of these streets.

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

Alternative access route for trucks

The EIS states that there are 'investigations' occurring into alternative access to the Darley Road site. The EIS does not provide any detail on which residents can comment about alternative access which would keep trucks off Darley Road. The plans for alternative access should be expedited. It should be a condition of approval that the alternative access is confirmed and that no spoil trucks are permitted to access Darley Road due to the unacceptable noise, safety and traffic issues that the current proposal creates.



Trucks on local streets

Note 1 to Table 8-43 states:

'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.

We 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. Alternative sites have been identified which provide adequate worker parking and the proponent has not given an adequate explanation as to why these alternatives have not been included in the EIS.

The EIS permits trucks to access local roads in 'exceptional circumstances' which includes queuing at the site. Given the constraints of the Darley Road site, queuing will be the usual situation.



The EIS needs to be amended to **remove queuing** as an 'exceptional circumstance'. The truck movements should properly managed by the contractor so that there is no queuing. Retaining this exception will make it easier for contractors to neglect their obligation to monitor and manage truck movements in and out of the site and needs to be removed. The EIS needs to specifically mention all local streets abuttign Darley Road and expressly prohibited truck movements (including parking) on these streets. This should include all streets from the north (James St) to the south (Falls Road), which are near the project footprint. The EIS needs to be amended to rule out queuing as an exceptional circumstance which allows trucks to use local roads.

Further Traffic impacts

Local road diversions and closures

The EIS states that *'temporary diversions along Darley Road may be required during construction'* (8-65). No detail is provided as to when these diversions would occur; there is no provision for consultation with the community; no detail as to how long the diversions will be in place and no comment on the impact of diversions on local roads or the amenity of residents. Will diversions occur at night? If so, down what streets? Diverting the arterial traffic from Darley Road down local streets (which are not designed for heavy vehicle volumes) will result in damage to streets, sleep disturbances for residents and create safety issues. There is also childcare centre and a school near the William Street/Elswick Street intersection which will be impacted by diverting vehicles onto local roads. It is unacceptable for proposed road diversions not to be detailed whatsoever in the EIS.

The EIS should not be approved without setting out the impacts of road diversions on residents and businesses. 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.

Contractor worker parking - Leichhardt

The SEARS requires that *'construction worker parking' effectively manages network capacity and levels of service; and the safety and efficiency of the transport system so as to minimise impacts'* (SEARS, March 2016, item 1)

We object to the Civil and Tunnel Construction site at Darley Road because the proponent has no proposal or plan to manage the impacts in relation to contractor worker parking. The impacts are clearly foreseeable yet there is no plan for worker parking and as a result the residents of Charles St, Hubert St, Darley Rd and Francis St will not be able to park on their streets and will be adversely impacted by worker parking. It is completely unacceptable for a major construction site to be proposed to be located in a village, non-industrial setting, such as Darley Road, without providing either allocated sufficient car parking or an alternative, enforceable plan to move workers in and out of their workplace without unfairly taking resident parking.

In 8.3.1 of the EIS the proponent states that:

A number of the project's staff and labour force would be expected to drive to construction sites and would therefore require car parking.' And that 'It is anticipated that construction workforce parking would be primarily provided at the following sites: Northcote Street civil site (C3a) – around 150 car parking spaces (Option A) Parramatta Road East civil site (C3b) – around 140 car parking spaces (Option B) Rozelle civil and tunnel site (C5) – around 400 car parking spaces Campbell Road civil and tunnel site (C10) – around 150 car parking spaces.

These facilities would be used to provide worker parking and shuttle bus transfers to other nearby construction sites.'

It is inevitable that the main contractor and sub-contractor workers at the Darley Road site will not avail themselves of the parking sites and shuttle bus at these locations and that they will end up parking in streets near to the site. They will do this because it is more convenient for them to park in local streets.

The EIS states that workers 'will be encouraged to use public transport.' Parking is at a premium 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. We have also been informed by Peter Jones that SMC are also considering acquiring the parking available on the opposite side of Darley Road during the construction period, removing another 20-30 car spaces. There is also a pre-DA application for 120 units on William Street which is not taken into account in the EIS, along with a major development of several hundred units on the corner of Allen and Flood Street leichhardt. This will place further stress on parking and is not mentioned in the EIS where parking impacts are supposedly set out. If this site proceeds, the EIS approval conditions at a minimum should:

- (a) prohibit any worker parking on local streets;
- (b) provide that RMS is to fund any policing that is required of parking restrictions;
- (c) require the contractor to require workers to use public transport such as the tram which is directly next door to the site (which is policed) or arrange for them to be bussed in. This requirement needs to be backed up by proper enforcement and contractual penalties if breached by workers.

Traffic operational modelling

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

Heavy vehicle movements during peak hours

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

Failure to assess - impacts on public transport, pedestrians and cyclists

We further object to the Darley Road site 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

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 learnt 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, namely:

- 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.

- The steep grade slows down heavy vehicles which will contribute to congestion further adding to vehicle emissions as compared to free flowing traffic.

The proponent should be required to redesign the tunnels so that no gradient exceeds 4%.

Depths of tunnelling and incomplete EIS diagrams

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

In response to enquiries made to the Westconnex Info line it was confirmed that the depths are measured from the excavation to the surface. Diagrams of the tunnel dimensions in the EIS only give 5.3m as a minimum height. When further clarification was sought of the total height ie from the tunnel floor to the crown (top of the tunnel), Westconnex Infoline confirmed that 5.3m is the 'minimum height', and when pressed further that there is an extra 2.2m above this to allow for signage and jet fans, giving a total height of 7.5m. This is in contrast to information from staff at the Westconnex Information Balmain session who claimed the extra section above the minimum height of 5.3m would be between 1 to 1.5m.

It throws into confusion what the total height of the tunnels are and therefore the depths of tunnels below homes, which again the Information Session staff stated could be changed by the contractors. What are residents expected to believe? Yet Westconnex is asking residents to provide feedback on inadequate, conflicting information.

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

Recent experience tells us that numbers of people in the ongoing construction of Stages 1 and 2 have suffered extensive damage to their homes caused by vibration, tunnelling activities, and changed soil moisture content costing thousands of dollars to rectify, and although they followed all the elected procedures their claims have not been settled. Insurance policies will not cover this type of damage. The onus has been on them to prove that damage to their homes was caused by Westconnex. Furthermore, the EIS actually concedes that there will be moisture drawdown caused by tunnelling. There is nothing addressing these major concerns in the EIS. This is what residents in Annandale, Leichhardt and Lilyfield are facing and it is totally unacceptable.

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

Environmental risks

Contamination - Darley Road

We 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.'*

7 Darley Road is a site which has been reported to the NSW EPA under section 60 of the *Contaminated Land Management Act (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).

We 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 at all and in particular when this dive site is not necessary. 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. 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. The proponent in identifying the potential contamination impacts at Darley Road states that:

'Previous soil investigations identified fill material with slightly elevated metals and PAHs, although the site is still suitable for ongoing commercial/industrial land use. A UST has also been decommissioned. If present and not appropriately controlled, there is potential for:

- *Direct contact, inhalation and ingestion risk to site workers from contaminated soil or hazardous building materials via dust*
- *Discharge of contaminated surface water to the stormwater system and ultimately Hawthorne Canal and Iron Cove*
- *Incorrect handling or disposal of spoil*

- *Disturbance of actual or potential acid sulfate soils at the western end of the site which could impact local soil and water quality.'*

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.

The proponent rates contamination at this site as a medium risk yet the proponent's track record in managing these risks suggests otherwise.

- In April 2016 Marrickville Council voted to release confidential legal advice which suggested that WestConnex had been operating for months without any legal approval, including in the handling of toxic waste and asbestos.
(<http://www.southernthunderer.com.au/westconnex-acts-illegally-in-handling-of-toxic-waste-and-asbestos/>)
- In September 2016 it was reported by the ABC that a former employee of Sydney excavation company Moits, Daniel McIntyre, has claimed the company supplied asbestos-laden road base to the WestConnex project.
(<http://www.abc.net.au/news/2016-09-01/asbestos-westconnex-allegations-labor-calls-for-works-to-stop/7803378>)
- In August 2017 it was reported by the Parramatta advertiser that Granville and Harris Park residents living in a hotspot asbestos dumping ground, who have been warned not to mow their lawns too short or dig in their back yards for fear of deadly contamination, say they are inhaling dust kicked up by WestConnex trucks.
(<http://www.dailytelegraph.com.au/newslocal/parramatta/granville-and-harris-park-residents-fear-contamination-from-asbestos-from-dust-created-by-westconnex-trucks/news-story/853d43d153da6c5edeb64d1043b00c68>)
- In August 2017 the NSW Environment Protection Authority (EPA) has fined WestConnex contractors CPB Contractors \$8,000 following an investigation into the emission of offensive odours at the St Peters Interchange worksite in March this year.
<http://www.epa.nsw.gov.au/epamedia/EPAMedia030817.htm>
- On numerous occasions in Campbell Street St Peters residents have observed inadequate and dangerous risk asbestos management practices by WestConnex contractors such as using hoses to damp down dust and material containing asbestos without wearing protective clothing.

Risk of settlement (ground movement)

The EIS states that *'settlement, induced by tunnel excavation, and groundwater drawdown, may occur in some areas along the tunnel alignment'* (Executive Summary, xvii). The risk of ground movement is lessened where tunnelling is more than 35 metres. However, it is proposed to tunnel at 29 metres under Hawthorne Parade, Haberfield and at 35 metres at Elswick Street North, Leichhardt. The EIS also states that there are a number of discrete areas to the north and northwest of the Rozelle Rail Yards, to the north of Campbell Road at St Peters and in the vicinity of Lord

Street at Newtown where ground water movement above 20 milliliters is predicted. In Rozelle tunnelling will occur under homes at less than 10 metres. This proposed tunnelling the EIS states that *'strict limits on the degree of settlement permitted would be imposed on the project'* and 'damage' would be rectified at no cost to the owner (Executive Summary, xvii -iii). This is not acceptable. The Project should not be permitted to be delivered in such a way that there is a known risk to property damage that cannot be satisfactorily mitigated. Why should the homes of our community be collateral damage because of the Project's imperatives? Why should the taxpayer have to fund repairs to homes caused by a private contractor?

The project creates an unacceptable risk of ground movement. The Project should not be approved on the basis that it creates a risk of property damage that cannot be mitigated against to an acceptable level.

Impact on Dobroyd Canal and Hawthorne Canal - Leichhardt

The Hawthorne canal, which is the closest waterway to the Darley Road site, is described in the EIS as a 'sensitive receiving environment' (Executive Summary, xix). Darley Road is a contaminated site with probable asbestos. The permanent water treatment plant to be established during construction proposes running water from the treatment plant directly into the waterways. It will involve water from the tunnel discharged to local stormwater systems and waterways; this is a permanent environmental impact. This proposal will further compromise the quality of the waterway and impact on the four rowing clubs in close vicinity.

Flooding - Leichhardt

The EIS states that there may be impacts from flooding which, amongst other things, may disrupt drainage systems. There is no detail as to how the issues with flooding at Darley Road will be managed and on their potential impact on the area. (Executive Summary, xxi) Darley Road and adjacent streets such as Hubert St are exposed to flood and are 'flood zones'. 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. 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.

Removal of vegetation

The EIS states that all vegetation will be removed on the Darley Road site. There are several mature trees located on the north of the site. None of these trees should be removed as they provide precious greenery. They also act as a visual and noise screen for residents from the City

West Link traffic. All efforts should be taken to retain the trees and the EIS should not simply permit these trees to be removed without proper investigations being undertaken as to how they can be retained. Removal of these trees 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. If they are removed following a proper investigation and consideration of all options) then the approval needs to specify that all streets are replaced with mature, native trees at the conclusion of the construction at the site.

Visual Impacts

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

Health Risks of Project

The health impacts of the Project and the cumulative health impacts of the Westconnex Project as a whole (both long and short-term) are not adequately addressed in the EIS and therefore a proper assessment of the acceptability of the Project's health impacts cannot be made. Where health impacts are dealt with, the analysis lacks depth, detail and credibility, as set out below.

Omission of sensitive receivers

In a serious omission, several schools, including Orange Grove Public School in Lilyfield and St Columba's Primary School in Leichhardt are omitted from the study area of sensitive receivers (11.1.3), despite the fact that they are within the human health risk assessment study area shown in Figure 11-1. This omission means that the health impacts have simply not been considered for these schools. RMS should be required to undertake a proper assessment of the health impacts on **all** sensitive receivers and the Project should not be approved until this is thoroughly completed and provided to the public for comment.

Project fails to minimise health impacts

RMS states in 11.2 'Project design to minimise health impacts' that:

'The majority of the project footprint is underground. This includes the mainline tunnels as well as the Rozelle interchange and the Iron Cove Link. This means that road traffic noise is avoided during operation of the project except where entry and exit ramps come to the surface. It also means that emissions from vehicles are removed from surface roads and dispersed from elevated ventilation outlets with minimal impact on local air quality (see section 11.5.1 and refer to Chapter 9 (Air quality)).'

It is clearly not the case that the emissions will be safely dispersed from the Rozelle Railyards ventilation stacks. These three stacks are planned to be 38 meters high. Rozelle Railyards is 3m above sea level. Orange Grove Public School and many residences in Lilyfield are 36 meters above sea level which is exactly where the emissions will travel in certain weather circumstances. Quite clearly RMS is repeating the mistakes of the M5 emissions stacks and failing to take account the local topography. Emission stacks are designed to be higher than where people go to school, work and live to enable dispersion.

Human health risk

The EIS states that there may be a 'small increase in pollutant concentrations' near surface roads (Executive Summary xvi). 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.

Dust Impacts

RMS admits in Chapter 11, 11.4 that its activities will have significant health impacts on people during construction in some circumstances and that these would not always be avoided:

'Dust management measures may not be effective all of the time.'

'In situations where the construction air quality management measures are not fully effective, impacts on the community would generally be temporary and short-term and are not considered to be significant.'

RMS has not explained the basis for arriving at the conclusion that the impact would not be significant. The Project should not be allowed to proceed until this basis is explained and verified. In the same paragraph, RMS admits that it can't avoid significant impacts 100% of the time. An asthma attack caused by exposure dust from construction which RMS has failed to control can be fatal. RMS states:

'The effectiveness of dust control measures would be monitored and adjusted as required. Where the dust mitigation measures are effectively implemented, impacts on the health of the community would be minimised.'

We have seen time and time again the failure of Westconnex contractors to manage dust impacts even when the dust contains lethal asbestos. The above statement about mitigation by RMS is meaningless, as what has been observed in reality is that that RMS, SMC and its Joint Venture contractors and their subcontractors continually flout dust mitigation measures.

The impacts are neither insignificant nor temporary. They are severe and ongoing for several years. The conditions under which the project is allowed to proceed must include severe sanctions for non-compliance with dust management measures. However it is LAW's position that the inadequate treatment in the EIS of health impacts should result in the rejection of this EIS.

The proponent appears to downplay the impact of dust emission from construction activities by stating that 'It is difficult to reliably quantify dust emissions from construction activities. Due to the variability of the weather it is impossible to predict what the weather conditions would be when specific construction activities are undertaken'.

This is an astonishing statement given the fact that the proponent is undertaking identical construction activities at numerous other sites as part of Stages 1 and 2 of the project. The proponent should by now be able to reduce any risks and impacts to zero in all weather circumstances. The proponent has failed to demonstrate that it is capable of managing risks that are capable of being managed and its proposals for the Darley Road Civil and Tunnel Construction site at Leichhardt should be rejected on this basis.

The proponent appears to downplay the impact of dust emission from construction activities further by stating that 'Any effects of construction on airborne particle concentrations would also generally be temporary and relatively short-lived.' This is also an astonishing statement given that a consequence of even one exposure to asbestos is fatal lung disease, not to mention the risk to children and adults with asthma. One asthma attack can result in death.

We object to the Darley Road Civil and Tunnel Construction site at Leichhardt because it creates an unacceptable risk to the health of workers and residents due to the dust impacts from demolition and construction and in addition will cause loss of amenity to residents.

Examples of Westconnex failure to adhere to asbestos and dust management measures

Report of Westconnex trucks creating dust in asbestos clean up site in Harris Park:

<http://www.dailytelegraph.com.au/newslocal/parramatta/granville-and-harris-park-residents-fear-contamination-from-asbestos-from-dust-created-by-westconnex-trucks/news-story/853d43d153da6c5edeb64d1043b00c68>

'While the area around the construction sites have been curtained off and asbestos warning signs are in place, when we visited the area we found several discarded asbestos masks and even what appeared to be an asbestos-protective suit dumped on the roadside.

"Trucks have been leaving Duke St coming down Victoria St past my home," Ms Poyner said.

"No water truck, no decontamination procedure, just dust.

"I find it absolutely unbelievable that given asbestos fact sheets to residents on the opposite side of my street because they appear in a report as a possible James Hardie asbestos legacy site, then I look at the dust being generated by WestConnex in my street and then you have two sites — one with asbestos operating procedures and one with none."

Demolition of homes on Campbell Street, St Peters for Westconnex

<https://www.youtube.com/watch?v=GkatiS807ws>



Report on Demolition of Haberfield houses for Westconnex:

<http://www.altmedia.net.au/demolition-of-haberfield-houses-begins/115750>

'WestCONnex Action Group (WAG) spokesperson Sharon Laura who lives nearby said she arrived to picket at around 7am on Tuesday morning to find work continuing in blustery conditions. By 9am, it was clear that small hoses used to dampen rubble could not control the dust and the fence around the construction site nearly blew over twice. Laura said that she unsuccessfully tried to make contact with Sydney Motorway Corporation's (SMC) Westconnex team or construction company Leighton's staff. Eventually she finally got through to a community engagement manager. While she was explaining what she saw as a dangerous situation, the temporary fence fell over altogether.

Work was then stopped for an hour. After the fence was secured, work continued in high winds. City Hub later observed asbestos sheets being carried from a house by masked men just a metre from a pedestrian footpath in strong winds that continued during the afternoon. Asbestos is a dangerous substance which in tiny amounts can cause the deadly cancer mesothelioma. The front verandah of the house was covered with a sheet of plastic which was partially blown away. It finally fell to the ground. While Leighton had erected a small sign announcing asbestos removal, no warning had been given to residents who walk past the site. Asbestos removed from the houses is being carted across the road to the main construction site for temporary storage.

This latest episode with asbestos reflect similar concerns about SMC's lack of warning and care in handling of asbestos voiced by residents in Granville, Auburn, Erskine Park and St Peters last year.'

SEARS Requirement - Air Quality

The SEARS (March 2016) requires:

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.

We object to the Darley Road site 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. In 11.5 'Assessment of Potential Operational Impacts' Part 11.5.1 'Air quality,' RMS states that:

"The assessment of impacts on air quality associated with the operation of the project has considered a range of scenarios that include the existing situation and operation for the future years 2023 and 2033; both with and without the project. The operational air quality assessment has focused on the following key pollutants associated with vehicle emissions:

- *Volatile organic compounds (VOCs)*
- *Polycyclic aromatic hydrocarbons (PAH)*
- *CO*
- *NO₂*
- *Particulate matter (PM_{2.5} and PM₁₀).'*

We see in Table 11-12 (**below**) that by 2033 the Project is predicted to increase our exposure to carbon monoxide to 6.9 mg/m³ per hour compared to 6.4 mg/m³ without the project and 4.8 mg/m³ compared to 4.4 mg/m³ per 8 hours without the Project.

There is no safe level of exposure to carbon monoxide and it is criminally negligent to design a project that will increase our exposure to carbon monoxide. The Government should not proceed with any infrastructure project that does not improve, but significantly worsens, air quality.

Table 11-12 presents a summary of the maximum predicted cumulative one-hour average and eight-hour average concentrations of CO for the assessment years 2023 and 2033, **without the project**, with the project and for the cumulative scenario.

Table 11-12 Review of potential acute and chronic health impacts – carbon monoxide

Scenario	Maximum 1-hour average concentration of carbon monoxide (mg/m ³)			Maximum 8-hour average concentration of carbon monoxide (mg/m ³)		
	Without project	With project	Cumulative	Without project	With project	Cumulative
2023						
Maximum	7.8	7.7	7.4	5.4	5.3	5.2
2033						
Maximum	6.4	6.9	6.0	4.4	4.8	4.2
Relevant health based guideline	30			10		

All the concentrations of CO presented in the above table are below the relevant health based guidelines. On this basis, it is considered that there would be no adverse health effects in relation to exposures (acute and chronic) to CO in the local area surrounding the project.

Long term exposure to air pollution is linked with an increased risk of high blood pressure. A new study by the European Society of Cardiology (ESC) links air pollution and traffic noise to an

increased risk of high blood pressure. Researchers found that even air pollution alone can have that effect: <http://www.dw.com/en/exposure-air-pollution-can-raise-blood-pressure-study/a-36162482>

"Based on the incidence of cases of hypertension among participants and air pollution measured, the study's authors concluded that for every additional five micrograms of particulate matter in the air, the risk of hypertension increased by more than a fifth. And it didn't merely affect people living in heavily polluted areas."

"One very important aspect is that these associations can be seen in people living well below current European air pollution standards," Hoffmann said. "Given the ubiquitous presence of air pollution and the importance of hypertension as the most important risk factor for cardiovascular disease, these results have important public health consequences and call for more stringent air quality regulations."

RMS has failed to explain whether and how the Project will lead to improved air quality and better health outcomes. A Rozelle Public School parent has reported being told by an RMS air quality expert that the increase in morbidity from the Victoria Road ventilation stack was 0.2 of a child per year. In other words, RMS predicts one child will die as a result of the poor air quality caused by the project every 5 years.

In Table 11-16, RMS shows the maximum calculated risks associated with short-term exposure to changes in NO₂ concentrations with operation of the Project. It is a serious omission that there is no equivalent table showing the maximum calculated risks associated with short-term exposure to changes in NO₂ concentrations *without* operation of the Project. The Project should not be allowed to proceed until all information is made available to enable a proper assessment of the risks.

In Table 11-17, RMS shows Calculated changes in incidence of health effects in population associated with changes in NO₂ concentrations with project and cumulative, but does *not* show the changes without the Project. This Table covers Mortality –all causes, Mortality –respiratory and Morbidity –asthma ED admissions. The equivalent information for the 'without' the project scenario should be provided before the Project is approved. Unless RMS can show that the Project will have a significant beneficial impact on Mortality –all causes, Mortality –respiratory and Morbidity –asthma ED admissions, then it should not proceed.

In Table 11-19 Review of Total Particulate Matter Concentrations – 24-hour Average, it should be noted that RMS predicts that in 2023 Maximum 24-hour average PM₁₀ concentration (µg/m³) will be higher with the Project (82) than without (81) and in 2033 the Maximum 24-hour average PM₁₀ concentration (µg/m³) will be higher with the Project (86.7) than without (81.3).

The stated goal in the EIS is 50. RMS should not be undertaking a Project that is inconsistent with the goal for achieving 50.

RMS states that:

'Concentrations of total PM_{2.5}, however, are essentially unchanged within the local community with the operation of the project.'

This is not a justification for the Project or a good result for Sydney. It is a basis for rejection of the Project. There is no analysis of what reduction in concentrations could be achieved if there was a significant programme of clean air initiatives including demand reducing public transport, banning diesel vehicles, putting freight on rail and so on. RMS and the Government are negligent in not looking at these alternatives instead of a polluting road. Westconnex will induce demand, there will be more cars on local roads and in the tunnel. The pollution from these vehicles will not disappear. It will land somewhere, whether it is emitted on above ground roads or dispersed through unfiltered ventilation shafts. Someone will end up breathing it in. RMS and Planning should consider why only those with a vested financial interest in the project are clamouring for it to proceed, whilst experts and communities with no vested financial interest beyond protecting their homes, health, communities and families are ignored.

In 11.5.2 RMS states that the:

Review of the calculated changes in risk indicates the following in relation to impacts associated with the expected operation of the project in 2023 and 2033:

- *A number of the calculated individual risks for the community receptors are negative, meaning that the operation of the project would result in lower levels of risk, when compared with the situation where the project is not operating*
- *The maximum risks calculated for exposures in residential areas are less than 1×10^{-4} and considered to be tolerable/acceptable.'*

RMS fails to set out what the risk outcome would be if the Project did not proceed and the Government undertook lower risk alternatives.

RMS further states that:

'The maximum risks calculated for exposures in commercial/industrial areas are between 8×10^{-7} and 2×10^{-4} ' and that 'The maximum risk level of 2×10^{-4} exceeds the adopted criteria for determining unacceptable risks'. RMS seems to be excusing this unacceptable result by stating that the:

'Impacts that result in exceedance of the adopted risk criteria occur only in the existing industrial location north and northwest of Sydney Airport, between Airport Drive, Alexandria Canal and the Princes Highway.'

There are many residences near this location, as well as schools. In other words, unacceptable impacts are predicted close to residential areas in St Peters and Tempe. RMS must be hoping that the air borne pollutants know to stay in the 'existing industrial location'. In addition, this 'existing industrial location' is the same location where RMS is planning the additional so called 'green space' for community recreation under the St Peters spaghetti junction. In other words, RMS expects the pollution in this green space to be unacceptable, yet is touting this as a benefit for the community!

Google map extract showing existing industrial location north and northwest of Sydney Airport, between Airport Drive, Alexandria Canal and the Princes Highway:



RMS negligently fails to assess the impact of the Sydney gateway project at this location. RMS states that:

'The maximum impacts predicted are on roadways/locations that may be within the future roadway alignments. The Sydney Gateway project would be subject to separate environmental assessment and approval, at which time a more detailed assessment of impacts in this area would be undertaken.'

RMS should be prevented from proceeding with this Project until the cumulative impacts of the St Peters interchange and the Sydney Gateway project are known.

RMS states that:

'The worst case scenario for potential exposure is where a resident works at the maximum impacted workplace and lives at the maximum impacted residential location. Where this may occur, the maximum risk is just less than 1×10^{-4} , which is considered tolerable/acceptable'.

RMS does not look at the circumstances in which this exposure may not be tolerable or acceptable or what choices people have who find themselves stranded in the maximum impacted residential location. These people are collateral damage and RMS fails to offer any alternatives to them. These people may have respiratory conditions, disabilities, young families or be elderly. RMS is completely ignoring what health experts are saying which is that there is *no safe level of exposure* to these emissions.

Motorway Operational Ancillary Infrastructure

We object to the Darley Road motorway operations complex (MOC1) proposed to remain on the Darley Road site post-construction. In 5.8.1 the EIS states that:

'Motorway operations complexes for the project would comprise:

The Darley Road motorway operations complex (MOC1) at Leichhardt, located south of City West Link and the Inner West Light Rail line on land occupied during construction by the Darley Road civil and tunnel site (C4).'

These will comprise:

Car parking
Substation/power supply
Workshop/offices
Storage
Water treatment plant/infrastructure

The EIS states that *'The need for a substation at the Darley Road motorway operations complex (MOC1) is being investigated and would be confirmed during detailed design'*. In Figure 5.44 only the substation and water treatment plant are depicted.

No justification or details of the impacts of including a workshop or offices is presented and thus the impacts of this cannot be assessed. The number of employees or vehicles that would attend the workshop or offices and at what times and days is not disclosed. No workshop or office should be permitted to be included in the Motorway Operations Centre at Darley Road because the proponent has failed to explain what these will be, why these are necessary or what their impact will be. 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.

We further object to the location of a permanent substation and water treatment plant on the grounds that this will limit the future uses of the land which is government-owned. The ongoing presence of this facility will limit future uses of the Darley Road site which could serve community purposes

The presence of this facility contradicts repeated assurances to the community by Peter Jones (SMC) that the site would be returned after construction was completed, 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.

Further, 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. 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 Motorway Operations Centre 1 (MOC1) is a completely inappropriate use of a site in a residential area with particular characteristics. The MOC1 proposal for a tunnel water treatment plant and an electrical substation is inconsistent with the character of the neighbourhood. This is a residential neighbourhood and what is proposed will permanently degrade our neighbourhood. MOC1 will be a prominent and unwelcome eyesore. The streets adjacent to Darley Road are comprised of low-rise residential homes and small businesses and infrastructure, such as this should not be permitted in such a location. The character of Leichhardt is heavily influenced by the street pattern (predominantly north/south extending from Parramatta Road) and built form. The wide carriageways and regular street pattern combined with the topography and a predominance of single storey detached housing gives Leichhardt a more open character than that of Glebe or Annandale.

The suburb is made up of several distinctive residential neighbourhoods including Excelsior Estate, Helsarmel, Piperston and West Leichhardt. The subject site is within the Helsarmel Distinctive

Neighbourhood that is located on the northwest slope of the Leichhardt/Balmain ridge. The Helsarmel Distinctive Neighbourhood is predominated by low scale detached and semi-detached cottages that demonstrated a variety of architectural styles and building materials. Many of these dwellings are Federation or post-war styles, with scattered examples of Californian bungalows and workers cottages.

The Council environmental planning documents for this area indicate it wishes to maintain the character of the neighbourhood by keeping development complementary in architectural style, form and materials and preserve the low scale cottage character. The suburb profile allows for contemporary development that is complementary to the streetscape.

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

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.



Figure 5.44 Darley Road motorway operations complex (MOC1)

5-17

In Figure 5.44 the Motorway operation infrastructure is located at the western end of the site, which is the location with the greatest visual impact to local residents and others. Residents on Darley Road opposite the site and residents in Hubert St will have a direct line of sight 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. The facility is out of step with the area which is comprised of low rise homes and detracts from the visual amenity of the area. This site is a pedestrian hub and will be a visual blight for pedestrians, bike users and the homes that have direct line of sight to the facility. It should not be permitted on this site.

In the event that the EIS is approved then the approval should be subject to a requirement that the proponent:

- (a) must incorporate the Motorway operation infrastructure in a way that creates the least visual impact to local residents and others;
- (b) must locate the Motorway operation infrastructure at the eastern end of the site where it will have the least visual impact. This will mean that the site is less visible to residents and most pedestrian access is at this end. There are no homes that will have direct line of site of the facility if it is moved;
- (c) prioritise the need to locate the Motorway operation infrastructure at the eastern end of the site where it will have the least visual impact when designing any drainage works or utility management measures involving the relocation of utilities either within the project footprint or outside it;
- (d) replace mature trees removed from the Darley Road site with mature trees and to plant mature trees on the remaining land;
- (e) to incorporate a permanent third access to Leichhardt North light rail station (specifically the Dulwich Hill bound platform) directly from the site. This will mean that light rail users coming from the western end of Darley Rd or from Francis, Hubert and Charles Streets can arrive at and depart from the light rail station without having to ascend to and then walk down the steepest section of Darley Rd (if they use the eastern exit) or walk down the pathway along the City West link, if they use the western exit. The western exit is regarded as being an option with a higher risk to personal safety by women if used after dark due to it being isolated, next to a noisy road and with bad visibility. This deters women from considering the light rail to be completely safe to use after dark. An additional exit on the level part of Darley Road will improve access to the Light Rail for the elderly and those with a disability. It will also be more convenient for those using the 'kiss and ride' parking.
- (f) To incorporate a bike rack at the additional access to Leichhardt North light rail station described above. This will encourage active transport for those wishing to cycle to the light rail.

SEARS Requirement: Water - Hydrology

The SEARS requires that:

Long term impacts on surface water and groundwater hydrology (including drawdown, flow rates and volumes) are minimised.

The environmental values of nearby, connected and affected water sources, groundwater and dependent ecological systems including estuarine and marine water (if applicable) are maintained (where values are achieved) or improved and maintained (where values are not achieved) (item 10, SEARS, March 2016)

The proposal for a permanent water treatment plan involves 'treated' water being directly discharged into the stormwater drain at Blackmore oval on a permanent basis. This plan will jeopardise the integrity of our waterway and compromise the use of the bay for recreational activities for boat and other users. There are four long-standing rowing clubs in the vicinity of this location. A priority of the Inner West Council is also to rehabilitate our local waterways. In a serious omission, RMS also fails to explain how contaminants removed from the tunnel water will be disposed of and what conditions will apply to its treatment and disposal. RMS fails to assess the

risk of these contaminants which will be generated by the project. We object in the strongest terms to this proposal on environmental and health reasons.

SEARS Requirement: Utility Services

The SEARS (March 2016, item 9) requires:

Where the project is predicted to affect trunk utilities, the Proponent must undertake a utilities management strategy. The strategy must identify proposed management strategies, including relocations or adjustment of the utilities, and their estimated timing and duration. This strategy must be developed in consultation with the relevant utility owners or providers.

The Darley Road proposal poses major risks to utility supply in the area and will entail massive and intrusive works to align with the Project's requirements. The EIS states in 5.10 Utility services:

'Utilities and services located within proximity of the project would likely need to be protected, relocated or realigned during construction, particularly in areas of surface or shallow soil disturbance'.

These services include electricity, telecommunications, sewer, water, stormwater, gas and Sydney Trains services. The project would also require connection to electricity, water and wastewater/sewer utilities. A Utilities Management Strategy has been prepared for the project and is included in Appendix F (Utilities Management Strategy). The Utilities Management Strategy provides information in relation to:

- *Utility relocations and adjustments which are currently known and proposed within the project footprint. These have been considered as part of this EIS*
- *Utility relocations and adjustments which are currently unknown and/or located outside of the project footprint. The Utilities Management Strategy provides the framework for how these utility relocations and adjustments would be assessed and managed*
- *Utility connections required to facilitate construction and operation of the project.*

The Utilities Management Strategy should be read in conjunction with Chapter 6 (Construction work) and Chapter 12 (Land use and property). The location of existing utility service and any changes required would be confirmed by the construction contractor during the detailed design of the project in consultation with the relevant utility provider.

Further in Appendix F, the EIS states:

3.3.1 Darley Road civil and tunnel site, Leichhardt

Two Sydney Water sewer mains run north/south through the site. One of these sewer mains (225 millimetre diameter) would be relocated to a new utility service corridor along part of the northern boundary of the site, while the other main (150 millimetre diameter) would be retained and protected.

There is also a sewer main (150 millimetre diameter) that enters the southeast corner of the site. A small section of this asset would either be retained and protected or relocated to the south along Darley Road outside the construction site boundary.

Along a section of Darley Road and James Street there is a sewer main (450 millimetre diameter) which would potentially be impacted by the proposed construction access tunnel. The sewer main is located seven to nine metres clear of the tunnel roof and therefore the risk of settlement impacts is considered to be negligible. Further discussions would occur with Sydney Water about protection of this asset.

An overhead 33kV Feeder to the 760 Sydney Trains transmission line runs along the northern verge of Darley Road adjacent to the site. This overhead line would be protected during construction.

Vehicle access points along Darley Road would be located to avoid pits, manholes and pillars so that asset maintenance is not compromised.

The existing utility services in this area are listed in Table 3-3 together with proposed management measures. They are also shown in Annexure A.'

Table 3-3 Utilities at Darley Road, Leichhardt

Utility service	Description	Existing location	Within or outside the project footprint	Proposed management measures
Sydney Water sewer main	225 mm diameter sewer main	Running north-south through the central part of the site.	Within the project footprint.	Relocation – sewer main to be relayed within shared utility corridor along part of the northern boundary of the site.
Sydney Water sewer main	150 mm diameter sewer main	Running north-south through the western part of the site.	Within the project footprint.	Retain and protect (if required).
Sydney Water sewer main	150 mm diameter sewer main	Running across the south east corner of the site.	Within the project footprint.	<u>Option 1</u> Retain and protect (if required). <u>Option 2</u> Relocation – sewer main to be relayed to the south along the northern verge of Darley Road.
Sydney Water sewer main	450 mm diameter sewer main	Running north-south along Darley Road and James Street.	Within the project footprint.	Retain and protect (if required).
Ausgrid 33 kV Feeder	Overhead 33 kV Feeder to the 760 Sydney Trains transmission line	Running east/west along Darley Road adjacent to the southern boundary of the site.	Within the project footprint.	Retain and protect (if required).

Further, the EIS states in 4.1.4 Darley Road, Leichhardt:

'The location of the proposed supply point for the Darley Road civil and tunnel site (C4) is the Leichhardt substation on Balmain Road opposite the corner of Derbyshire Road some 850 metres to the south east of the construction site.'

The maximum demand of 8 MVA would require two HVCs connected by cables to the Ausgrid 11 kV network. The connection would run from the substation on Balmain Road in a north-westerly direction toward the construction site following existing road reserves. The proposed connection would be located outside of the project footprint and therefore would be subject to the environmental constraints analysis and environmental risk assessment process as detailed in section 9.2.

An indicative alignment is shown in Figure 4-2. The final alignment would be determined in consultation with Ausgrid during detailed design.'



Figure 4-2 Construction power - Darley Road, Leichhardt

33

We object to the selection of Darley Road as a construction site for the M4-M5 Link because it will necessitate significant utilities work through Leichhardt as shown in fig 4-2, which will have a significant adverse impact on residents and will create an unacceptable cumulative impact over the course of the project.

The Darley Rd site has many negative impacts (safety, traffic, construction noise, trucks, worker parking, loss of amenity) which will cause residents an unacceptable degree of stress and disturbance. The utilities works which will be necessary if this site goes ahead will significantly add to the adverse impact of this site.

The experience of residents impacted by other stages of the project is that utilities works occur during periods of respite from project work and the residents, proponent and contractor are powerless to prevent this. The utility companies are not subject to the project approval conditions. The cumulative impact is very distressing as we know from speaking to residents in St Peters, Ashfield and Haberfield.

The proponent has failed to adequately consider alternative construction sites (City West link, Lilyfield Rd) which would have a significantly lesser impact on residents in terms of utilities works and cumulative impacts. Construction power is already proposed to be run from the Ausgrid substation on Balmain Rd at Leichhardt in a north easterly direction through Lilyfield to the Rozelle civil and tunnel site following existing road reserves. It would make more sense to duplicate this path to the alternative construction site (City West link, Lilyfield Rd).

The proponent has failed to provide any analysis of the impacts of the alternative construction site (City West link, Lilyfield Rd) vis a vis the Darley Road site. Darley Road should be rejected because the impacts for residents are clearly greater than at the alternative sites.

Flooding and Proposed drainage infrastructure

The SEARS requires (March 2016, item 12):

The project minimises adverse impacts on existing flooding characteristics.

Construction and operation of the project avoids or minimises the risk of, and adverse impacts from, infrastructure flooding, flooding hazards, or dam failure.

The EIS states in 5.9.1 Tunnel drainage and treatment infrastructure, that:

'Tunnel drainage and treatment infrastructure would be designed to accommodate a combination of water ingress events including:

- *Groundwater ingress*
- *Stormwater ingress at portals*
- *Tunnel wash-down water*
- *Fire suppressant deluge or fire main rupture*
- *Spillage of flammable or other hazardous materials.*

Separate sumps would be provided at tunnel low points to collect tunnel drainage from two input streams: groundwater ingress and other potential water sources. Further information regarding the likely treatment methods and wastewater volumes is provided in Chapter 15 (Soil and water quality) and Chapter 17 (Flooding and drainage). Water that enters the mainline tunnel drainage systems would be pumped to a water treatment plant at the Darley Road motorway operations complex (MOC1) at Leichhardt. Options for discharge of treated water from the Darley Road water treatment plant include:

- *Direct discharge to Hawthorne Canal, which would require a pipe to be installed along Canal Road and the construction of a new outlet in the wall of the Hawthorne Canal*
- *Direct discharge to the existing stormwater pipework in an adjoining road (ie Canal Road), which would require a pipe to be installed to connect to existing piped drainage*
- *Direct discharge into the sewer system located on the site, which would require a Trade Waste Agreement with Sydney Water.*

Further detail regarding these discharge options is included in Appendix F (Utilities Management Strategy). The preferred option for treated water discharge from the Darley Road water treatment plant would be confirmed during detailed design.'

The EIS states further in 5.9.2 Surface water drainage and management infrastructure:

'The operational water treatment plants would be designed, constructed and operated to treat tunnel water prior to discharge to the stormwater drainage system. Operational water treatment facilities would be located at:

- *The Darley Road motorway operations complex (MOC1) at Leichhardt'*

'The water treatment facilities would consist of:

- *A balance tank to regulate flows into the plant*
- *A treatment plant, including clarifier and control room, to treat water prior to discharge into the stormwater drainage system.'*

Further in Chapter 17 the EIS states:

'17.2.3 Hydrology and flooding

Flood risk in the study area has increased since the onset of urbanisation, as a consequence of:

- *Development occurring prior to the installation of road drainage systems in the 1900s*
- *Development occurring in overland flow paths or in localised topographic depressions and encroaching into floodplains, which reduces storage capacity*
- *Culverting and channelisation of watercourses which increases the speed of water travelling through the system*
- *Increases in impermeable land, resulting in increased runoff during rainfall events.*

This means that the watercourse flow rates and water levels respond more quickly to rainfall events, due to reduced storage and infiltration capability within the catchments. Areas affected by flooding (local and regional) are discussed below.

Council flood studies have been prepared for the major catchments that the project would cross. The main one is the Leichhardt Flood Study (Cardno 2014a), undertaken in 2015. The new Inner West Council is currently considering that flood study in their preparation of a Floodplain Risk Management Study and Plan for the new Council. In the absence of a floodplain risk management plan, the assessment of flood behaviour (existing and future) has therefore been based on the Leichhardt Flood Study.'

The EIS states in 17.2.2 Drainage:

'To the south of the proposed Darley Road tunnel and civil site (C4), an Inner West Council stormwater drainage system serves the road network. The drainage network on Darley Road is reported to consist of pipes 2,400 millimetres in diameter receiving surface water inputs from drainage to the east and to the south.

The age or quality of some of these existing stormwater drainage assets may reflect the age of the buildings and houses in the area. Therefore, some of the assets are potentially nearing, at, or beyond the end of their design life. The stormwater network is owned by

Sydney Water and the Local Government authorities (Inner West and City of Sydney councils).'

Further the EIS states:

'Darley Road

The Darley Road civil and tunnel site (C4), where the operational water treatment plant for the project may be located, is situated south of City West Link in the catchment of Hawthorne Canal. The site is situated in an area that has been assessed by two flood studies, the Hawthorne Canal Flood Study (WMAWater 2013a) commissioned by Ashfield and Marrickville Councils, and the Leichhardt Flood Study.

The site slopes east to west with ground levels dropping from about 12 metres AHD to four metres AHD. The eastern side of the Darley Road site sits higher than the Inner West Light Rail line to the north, with levels dropping by about eight metres in its western extent and sitting lower than the rail line.

The Hawthorne Canal Flood Study shows that the Darley Road site is on the fringe of the 100 year ARI flood extent. However, most of the site may be inundated in a PMF, particularly the western half of the site, with depths of up to 0.5 metres within the site and up to one metre around the intersection of Darley Road and Charles Street. The Leichhardt Flood Study identified that part of the Darley Road civil and tunnel site (C4) may be subject to flooding during the PMF to similar depths. The site is identified as a flood control lot in the Leichhardt Development Control Plan 2013.

The site itself has a limited catchment area and the presence of low walls on the eastern side of the site reduces the potential for runoff to enter from higher ground near City West Link, deflecting it onto Darley Road and around to the south of the site.

During the PMF event, the northeast section of the site is subject to flooding as a consequence of water spilling onto the site from the Leichhardt North light rail stop platform area. The western section, which is the lowest part of the site, is inundated by floodwater during the PMF event as a consequence of water spilling from the Inner West Light Rail line, as well as from water that collects at the topographic low point near the junction of Darley Road and Charles Street.

Localised inundation depths of less than 0.2 metres are expected for the 10 year ARI event. Maximum depths on the western section of the site are about 0.8 metres for the PMF event (Figure 17-18 to Figure 17-20).

The velocity of water through the site is generally less than 0.1 metres per second except on the steeper areas where water flows from Darley Road onto the site. Velocities on Darley Road are estimated to be up to 1.5 metres per second along the kerb line. Flood hazards near the site are generally low, but medium to high hazards are estimated along the north-eastern boundary with the Inner West Light Rail line (see Figure 17-21).'

Table 17-3 states in relation to Darley Rd:

Table 17-3 M4-M5 Link operational surface features and existing flood risk

Project surface feature	Catchment	Existing flood risk assessment	Existing flood risk review	Further assessment required?
			<p>the New M5 project.</p> <p>The tunnel ventilation facility for the M4-M5 Link project would be above the tunnel portal and would therefore also be flood protected up to the PMF event.</p> <p>The project would not change surface levels or layout outside of the perimeter flood bund and therefore would not have a detrimental impact on flood risk to surrounding properties at this location. No further mitigation is required at this location.</p>	
Darley Road	Hawthorne Canal	<p>Hawthorne Canal Flood Study (WMAwater 2013a)</p> <p>Leichhardt Flood Study (Cardno 2014a)</p>	<p>Localised ponded water on the north-eastern side of the site for 20 year ARI event.</p> <p>Flood water depths up to 0.8 metres during the PMF event.</p> <p>Potential risk to project (inundation of portals and Darley Road motorway operations complex (MOC1)).</p> <p>Potential to displace water and impact on flood risk to surrounding properties.</p>	Yes

Further the EIS states in 17.3 Assessment of potential construction impacts:

'Construction works have the potential to change flood behaviour and impact on the surrounding environment. In addition, flooding has the potential to impact on areas within and near construction sites for the project (ie potential inundation of project sites).'

And in 17.3.1 Flooding and Drainage:

'This section considers flood behaviour resulting in potential detrimental increases in the potential flood affectation of the project infrastructure and other properties, assets and infrastructure. Flooding during construction of the project could potentially impact areas within and near the construction sites.

Flood related impacts during construction could include:

- *Inundation of excavated tunnels*
- *Damage to facilities, infrastructure, equipment, stockpiles and downstream sensitive areas caused by inundation from floodwaters*
- *Increased risk of flooding of adjacent areas due to temporary loss of floodplain storage (due to displacement of water) or impacts on the conveyance of floodwaters.*

Table 17-4 Construction ancillary facilities and flooding

Construction ancillary facility	Facilities	Existing flood risk (source, mechanisms)	Potential impacts
C4 Darley Road civil and tunnel site	<ul style="list-style-type: none"> • Temporary access tunnel for construction • Buildings and laydown area • Parking • Acoustic shed and spoil handling area • Temporary sub-station 	<ul style="list-style-type: none"> • Hawthorne Canal catchment • Localised shallow flooding from 10 year ARI and 100 year ARI flow path from light rail line • Majority of the site may be inundated in a PMF with depths up to 0.5m at the western end of the site • Hawthorne Canal Flood Study (WMA Water 2013a), Leichhardt Flood Study (Cardno 2014a), AECOM flood modelling (2016) 	Potential displacement of water by bunding of tunnel ramps to prevent floodwater ingress, as well as presence of temporary noise walls, buildings/hoarding, acoustic shed, stockpiles and other structures.

The EIS states in relation to localised flooding and drainage:

'All construction works would have the potential to impact local overland flow paths and existing minor drainage paths. Disruption of existing flow paths, both of constructed drainage systems or those of overland flow paths, could occur as a result of:

- *Disruption of existing drainage networks during decommissioning, upgrade or replacement of drainage pits and pipes*
- *Interruption of overland flow paths by installation of temporary construction ancillary facilities*
- *Sediment entering drainage assets and causing blockages*
- *Overloading the capacity of the local drainage system.*

These are typical impacts faced on most construction projects and would be addressed by adopting industry standard mitigation measures. Consideration of these impacts would be included during future detailed design and construction planning phases, along with consideration of the typical mitigation measures described in section 17.5 and Appendix F (Utilities Management Strategy).

Assessment and mitigation of sedimentation is provided in Chapter 15 (Soil and water quality).'

Further, Appendix F of the EIS states:

'5.4 Drainage works outside project footprint

Drainage works proposed outside of the M4-M5 Link project footprint include a number of options that are being considered for managing treated water from the Darley Road water treatment plant. These include:

- *Direct discharge to Hawthorne Canal, which would require a pipe to be installed along Canal Road and the construction of a new outlet in the wall of the Hawthorne Canal*
- *Direct discharge to the existing stormwater pipework in an adjoining road (ie Canal Road), which would require a pipe to be installed to connect to the existing piped drainage and potentially other augmentation of the stormwater drainage network*
- *Direct discharge into the sewer system located on the site, which would require a Trade Waste Agreement with Sydney Water.*

The first two of these options are shown in Figure 5-1 and would involve work being undertaken in areas outside of the project footprint and therefore would be subject to the environmental constraints analysis and environmental risk assessment process as detailed in section 9.2.'

We object to the proposal for the Proposed drainage infrastructure from the Darley Road motorway operations complex (MOC1) at Leichhardt because:

1. The proponent has selected a highly inappropriate site for construction in its proposal at Darley Road. Darley Road and adjacent Hubert St are exposed to flood which exposure could be exacerbated by the disruption or blockage of existing drainage networks. The proponent has not adequately explained in the EIS its basis for ruling out the City West Link Lilyfield alternative which would not impact on any flood lots because it is not adjacent to any residences. The proponent should forgo a mid-point construction site at Darley Rd on this basis.
2. The proponent has failed to take account of the Inner West Council's Leichhardt Floodplain Risk Management Plan NA49913094. The effect of this failure is to risk jeopardising the recommended flood modification options. If the proponent's plans prevent the Inner West Council from implementing the most effective flood risk management proposal to protect property in flood lots in Hubert St and Darley Road then this will effectively have a permanent and serious adverse impact on those lots.
3. The proponent has not taken account of option HC_FM3 to lay additional pipes/culverts from Elswick Street to Hawthorne Canal (via Regent Street and Darley Road). Also extra pipes at Darley Road to reduce flood depths on the Road.
4. The proponent has not taken account of option HC_FM4 to lay additional pipes/ culverts from William Street to Hawthorne Canal via Hubert Street and Darley Road.

In the event that the EIS is approved the proponent should be required to fund HC_FM3 and HC_FM4 by way of compensation to the residents of this area for the disruption and negative impacts of its operations in Leichhardt.

Inner West Council

Leichhardt Floodplain Risk Management Plan
Leichhardt Floodplain Risk Management Study and Plan

Table 4-2 Recommended Flood Modification Options

Option ID	Option Description	Capital Cost	Annual Costs	BCR	MCA Score	MCA Rank	Figure Ref
WC-FM3	Balmain Road Flow Path – Additional pipe from the low point on Norton St to the existing pipe network (towards Parramatta Rd). Duplication of existing pipe network or extra pipes from Balmain Rd to Whites Creek Culvert at Hearn St.	\$7,047,700	\$7,300	1.59	64.0	1	4-2
HC_FM1	Additional pipes /culverts from Parramatta Road to Hawthorne Canal via Beeson Street.	\$11,482,900	\$7,600	0.71	58.8	2	4-3
WC-FM5	Detention Basin at Mackenzie Street (upstream at the intersection of Mackenzie and Milton St)	\$933,800	\$5,000	1.85	58.5	3	4-4
HC_FM3	Additional pipes/culverts from Elswick Street to Hawthorne Canal (via Regent Street and Darley Road). Also extra pipes at Darley Road to reduce flood depths on the Road.	\$17,044,600	\$10,800	0.13	52.2	4	4-5
WC-FM1	Whites Creek Culvert – Proposing additional culvert or duplication of existing Whites Creek culvert from Parramatta Rd to the open channel downstream of Moore St (at Wisdom Street). Also combining WC-FM2 along with this option.	\$20,455,400	\$15,800	0.21	50.7	5	4-6
WC-FM6	Styles Street Flow Path – Additional pipes from Mackenzie St to Whites Creek Culvert.	\$9,398,500	\$6,100	0.28	49.2	6	4-7
HC_FM4	Additional pipes/ culverts from William Street to Hawthorne Canal via Hubert Street and Darley Road.	\$8,300,000	\$7,100	0.17	43.2	7	4-8

Photograph depicting Charles Street, Leichhardt, when flooded (**below**):



Compensation

There is sparse detail in the EIS about how residents will be compensated for five years of severe impacts, noting that for residents of Haberfield there will be impacts for almost a decade.

With respect to property acquisition, the EIS states that 'Impacts associated with property acquisition would be managed through a property acquisition support service.' There is no reference as to how this support service will be more effective than that currently offered. There were many upset residents and businesses who did not believe they were treated in a respectful and fair manner in earlier stages. The EIS needs to include details as to lessons learned from earlier projects and how this will be improved for the M4-M5 impacted residents and businesses. (Executive Summary xviii).

LAW notes the policies and practices in place for the Crossrail project in the UK and calls upon the Department of Planning to review these and require that they be replicated for this Project if it is approved and applied retrospectively for Stages 1 and 2. In particular, the following features should be noted:

- Crossrail required contractors to provide noise insulation and temporary rehousing where the noise was likely to cause acute disturbance for substantial periods of time.
- Crossrail also aimed to do more than bare compliance or meet minimum standards.
- Crossrail developed Performance Assurance Standards to score and report contractor's' performance. (refer '*Managing Construction Noise and Vibration in an Urban Environmental*' on the learning legacy site: www.learninglegacy.crossrail.co.uk).
- There is also a Crossrail Complaints Commissioner.

The WestConnex project's status as a state significant infrastructure project under the EPA means that residents are powerless in the face of noise, vibration and ground settlement impacts. As we have seen with the case of Mr Nassrallah in Granville you can have a motorway built 2.5 metres from your house and can sustain months and months of environmental impacts as well as property damage before anything is done. Residents impacted by Crossrail have not had to battle the project for months and years like residents impacted by Westconnex have had to battle the Joint venture/ SMC/ RMS or Government in order to get an equitable outcome. Whether it is the remaining residents of Campbell St in St Peters who have asbestos laden clouds of dust blowing over their houses or the people near Northcote St in Haberfield now subject to 24/7 spoil truck movements, it is clear that the protections for those impacted are just not adequate.

Schemes such those implemented for Crossrail encourage best practice and are a good risk management tool because the contractors who carry out the project know that there will be quantifiable financial consequences if they breach the approval conditions. In contrast the sanctions for Westconnex contractors are weak.

No doubt RMS will try and argue that the Crossrail project operates in a different legislative environment to WestConnex, with applicable goals different to those adopted by State Government agencies in NSW for managing construction projects. WestConnex is supposedly regulated by the NSW Environmental Protection Agency and NSW Department of Planning and Environment in accordance with industry goals. What happens on the ground does not accord with this. Contractors remove asbestos without the proper protections in place. Poor dust management exposing the community young and old to silica dust and asbestos. The EPA has no authority to stop work, only to apply fines. The EPA has been ineffective in monitoring for asbestos and for breaches as documented by Four Corners.

RMS have advised us that construction noise and vibration goals for construction projects are guided by the NSW Interim Construction Noise Guidelines. They have said that this guideline looks to operate in a similar way to the British Construction Code of practice for noise and vibration control on construction and open sites, in that it provides goals and a certain degree of flexibility for the project's proponent to achieve the outcome. We would ask them why it is that Crossrail has not had the sort of opposition and the level of community anger that Westconnex has caused? RMS do not have an appetite for honest self appraisal of how they have let the community down through their failed experiment with the Sydney Motorway Corporation.

LAW calls upon the Department of Planning not to repeat the mistakes of the past when it comes to treating the community equitably and with respect.

RMS should have considered the following initiatives (www.learninglegacy.crossrail.co.uk):

- the Crossrail Noise and Vibration Mitigation Scheme which explains both how the noise insulation and temporary re-housing schemes works, and what affected persons should do if they think that they may be eligible for either scheme; and

- the Crossrail Ground Settlement Paper which explains the arrangements for assessing, monitoring and mitigating the effects of ground settlement arising from Crossrail construction.

Post Project

Return of the Darley Road site after construction

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

Future use of the Darley Road site

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

ATTACHMENTS

Questions in Writing to the Minister for Urban Infrastructure submitted by Anthony Albanese MP

Media release issued by Anthony Albanese '*Minister Won't Answer Questions on Westconnex*' (18 August 2017)

Media release by Inner West Council - '*Westconnex "Claytons: consultation an insult to the community"*' (25 May 2017)

Media release by Inner West Council - '*Council Concerned by Potential Westconnex dive Sites,*' 23 September 2016

Letter from Peter Jones (Project Director, M4-M5 Link) dated 24 February 2017

Letters from Stuart Ayres (Minister for Westconnex) to LAW

Letter to Stuart Ayres (Minister for Westconnex) from the Coalition Against WestConnex (CAW)(22 May 2017)

QUESTION IN WRITING

For the next sitting

ANTHONY ALBANESE: To ask the Minister for Urban Infrastructure—

(1) Can the Minister provide an explanation as to why the NSW Government commenced the acquisition process for the site at 7 Darley Road Leichhardt, for use as a mid-tunnel construction site for Stage 3 of the Westconnex project, prior to the reference design for that Stage of the project being finalised?

ANTHONY ALBANESE: To ask the Minister for Urban Infrastructure—

- (1) Could the Minister provide an explanation as to why the NSW Department of Roads and Maritime Services (RMS) informed Leichhardt residents that no decision had been made regarding the acquisition of 7 Darley Road Leichhardt to build a mid-level tunnel construction site for Westconnex while at the same time beginning the statutory acquisition process?
- (2) Does the Minister believe that the process undertaken by RMS in this instance constitutes an appropriate level of community consultation and transparency regarding a major infrastructure project?

ANTHONY ALBANESE: To ask the Minister for Urban Infrastructure—

- (1) Noting the reported acquisition costs of tens of millions of dollars, could the Minister outline the steps taken by the Commonwealth and NSW Governments to mitigate the exposure of taxpayers to paying compensation to Tdrahhciel Pty Ltd through the potential acquisition of the site at 7 Darley Road Leichhardt, which is being proposed as a mid-level tunnel construction site for Westconnex?
- (2) Is any of the advanced Commonwealth funding for WestConnex being used for this proposed acquisition?
- (3) Is any of the Commonwealth's concessional loan for WestConnex being used for this proposed acquisition?



**THE HON ANTHONY ALBANESE MP
SHADOW MINISTER FOR INFRASTRUCTURE, TRANSPORT, CITIES AND
REGIONAL DEVELOPMENT
SHADOW MINISTER FOR TOURISM
MEMBER FOR GRAYNDLER**

MINISTER WON'T ANSWER QUESTIONS ON WESTCONNEX

Back in May I asked the Minister for Urban Infrastructure Paul Fletcher to answer questions in relation to community concerns about the WestConnex project.

More than three months later, the questions remain unanswered.

Minister Fletcher was given the ample time limit of 60 days to answer queries related to the toll road.

These included exactly what steps the Federal and NSW State governments have taken to mitigate taxpayers having to foot the bill for the acquisition of the Dan Murphy's at 7 Darley Road in Leichhardt.

Now that Minister Fletcher's time is up I have asked the Speaker of the House of Representatives Tony Smith to seek reason as to why the Inner West has had to wait more than three months for answers to straightforward questions about this disruptive development in our community.

That the Minister responsible for urban infrastructure can't respond to simple questions about an urban roads project, speaks volumes about the vagueness of the design and development of WestConnex.

I will continue to call on Minister Fletcher, and the Federal and NSW State Governments to take responsibility and to provide accurate information to the community about further developments to the WestConnex project.

WEDNESDAY, 16 AUGUST 2017

WestConnex "Clayton's" consultation an insult to the inner west

Thursday 25 May 2017

Inner West Council has slammed the latest round of WestConnex community consultation as "inaccurate, confusing and misleading".

WestConnex is inviting comment on the M4-M5 Link Concept Design – "to a point," said Inner West Council Administrator Richard Pearson.

"The opportunity to feedback on the design is incredibly narrow," he said. "Just eight aspects of the Concept Design are open for comment – and these include the architectural design of the ventilation stacks and the entry and exit points!"

"I know our local residents will have a lot more to say about these than what they look like," he said.

Council has already labelled the Concept Design, "deliberately vague on construction details for the project, with a map (figure 6.1) showing large areas as 'potential construction areas'.

"How can the community properly comment on a design that raises more questions than answers?" asked Mr Pearson.

Council has noted that the Concept Design is "inaccurate, confusing and misleading", and that there seems to be deliberate omissions of adverse features, the locations of schools and aged care facilities, and traffic impacts.

At the Council meeting on Tuesday night, Council resolved to make urgent representations to the Minister for WestConnex to withdraw or augment the "general, vague and selective" Concept Design.

"But these are not the only problems. On top of all this, the opportunity to comment is very difficult to find on the WestConnex website, and when you do find it, it is a 6 megabyte download," Mr Pearson said.

"Plus, the consultation does not conform to any best practice models – the font size does not meet accessibility standards, there's no stated end date, and no explanation of what will happen to the feedback apart from saying vaguely that the feedback will 'inform our Environmental Impact Statement'.

"Council will urge the Minister to put in place a firm closing date for submissions, and that this be not less than eight weeks from the date of new or amended plans being released," Mr Pearson said.

"There must be proper purpose to this consultation. The community's comments must be factored into the EIS. There must be absolutely no overlap of the exhibition of the Concept Design with exhibition of the EIS. The whole stated purpose of exhibiting the Concept Design was to enable the community to see what was proposed, give their input and then see that reflected in the EIS," Mr Pearson said.

"If what we are hearing is true, that the EIS may come out before comments are received and considered on the Concept Design, then this is completely unacceptable, and makes no sense at all.

"I would hope that when the Minister becomes aware of this he will agree and ensure that the EIS is not released until comments have been received and fully considered. Otherwise it truly will meet the test of a "Clayton's" consultation," Mr Pearson said.



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Council Concerned by Potential WestConnex Dive Sites

Friday, 23 September, 2016

Council is calling on the Government and Sydney Motorway Corporation (SMC) to immediately release more information to the community on its tunnelling plans for Stage 3 construction of the WestConnex motorway.

Council is concerned that SMC may be considering both a Sydney Trains owned site at 7 Darley Rd, Leichhardt as well as nearby Blackmore Oval as potential 'tunnelling dive' sites for construction of the project's M4-M5 link.

Administrator Richard Pearson met with community representatives this week to hear firsthand of residents' concerns and has also raised the issue with Roads Minister Duncan Gay as well as written to SMC seeking detailed information on the proposal.

"While we understand a tender will not go out this year to construct the Stage 3 M4-M5 link of the WestConnex project, it is essential we strongly lobby the Government now to achieve the best outcome for our residents," he said.

"SMC potential use of either site as a tunnelling dive site would produce major impacts on the local area for an extended construction period including heavy vehicle traffic, worker parking, noise and vibration."

Mr Pearson said it is an unsettling time for the inner west community especially as Sydney Motorway Corporation are only releasing half formed information on potential sites which have not been fully examined, in terms of feasibility or viability.

"There is a lack of clear and specific information both to the Council and the community," he said.

"Council is trying to get better outcomes for the community but we can only deal with issues we are fully informed upon. We are not yet convinced that a tunnelling dive site is even required here.

"Managing the traffic impacts along Darley Rd and nearby streets will also require significant planning that is sensitive to the huge impact this project will have on local residents."



WestConnex

24 February 2017

Dear Resident,

M4-M5 Link mid-tunnel construction site options in Leichhardt

Work is underway on WestConnex, which involves widening and extending the M4 motorway, duplicating the M5 motorway and joining the M4 and M5 to create a free-flowing motorway network. The proposed M4-M5 Link is the third stage of the project and if approved, it will link the extended M4 motorway at Haberfield to the New M5 motorway at St Peters, and the Iron Cove Bridge and Rozelle Interchange.

As part of planning for the M4-M5 Link, two potential mid-tunnel construction sites are being considered in the Leichhardt area – 7 Darley Road and 29 Derbyshire Road.

While only one site will be required, further assessment is being undertaken on both sites to help inform the final design. The preferred site will be included in the Environmental Impact Statement (EIS) and will be subject to planning approval.

Following construction, the preferred site will be remediated and the community will have the opportunity to provide feedback on future use. Permanent access to the tunnel would not be required. Feedback on both of these sites can be provided from now until the end of the EIS consultation period.

The EIS, which is likely to be released in mid-2017, will include further detail about the proposed construction sites, including potential traffic impacts and air quality. When the EIS is released, community members will be able to make a formal submission on the project to be considered by the Department of Planning and Environment as part of its assessment of the M4-M5 Link project.

Before the EIS consultation period, we will be consulting on the latest design. Sydney Motorway Corporation will soon release a design report that includes the latest tunnel route, all shortlisted M4-M5 Link potential construction sites and other details.

We will continue to assess and compare the two potential Leichhardt mid-point construction sites. Part of this assessment will include community feedback. We will also look at how we can further reduce the impact of these potential construction sites on the community.

I encourage you to contact the M4-M5 Link engagement team on 1800 660 248 or email info@westconnex.com.au for more information and/or to organise a one-on-one meeting with the team.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Peter Jones', written over a circular stamp or seal.

Peter Jones
Project Director, M4-M5 Link



Stuart Ayres MP

Minister for Western Sydney, Minister for WestConnex, Minister for Sport

Ms Christina Valentine, Ms Catherine Gemmell and Ms Jennifer Aaron
Co-Convenors – Leichhardt Against WestConnex
Email: lawactiongroup@gmail.com

Dear Ms Valentine, Ms Gemmell and Ms Aaron,

Further to your correspondence dated 24 April 2017, I have noted the contents of your letter and appreciate your ongoing concerns.

The Environmental Impact Statement for the M4-M5 Link will be released in due course and will provide an opportunity for community feedback on the design plan that was released on Friday 12 May 2017. I welcome any submission you may wish to make during this process.

In the meantime, Mr Peter Jones, Project Director – M4-M5 Link, remains available to you to discuss any concerns you may have around Project Delivery.

Please contact Ms Nicole Ryan, Principal Manager Stakeholder Engagement, on (02) 8099 9298 or by email at Nicole.Ryan@westconnex.com.au to arrange a meeting.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Stuart Ayres".

Stuart Ayres MP

Minister for Western Sydney
Minister for WestConnex
Minister for Sport



Stuart Ayres MP

Minister for Western Sydney, Minister for WestConnex, Minister for Sport

Ms Christina Valentine, Ms Catherine Gemmell and Ms Jennifer Aaron
Co-Convenors – Leichhardt Against WestConnex
Email: lawactiongroup@gmail.com

Dear Ms Valentine, Ms Gemmell and Ms Aaron,

Thank you for your correspondence seeking a meeting to discuss the WestConnex project. I have noted the contents of your letter and appreciate the significant disruption that is taking place within the Leichhardt and Lilyfield communities.

Whilst I understand that the delivery of WestConnex comes with challenges for many people in the inner-west, the broader benefits for the people of Sydney on its completion will be a game changer for this city. Not only will it improve travel times for the people and small business owners of Western Sydney, but it will take traffic off local roads in your own communities.

You will be aware of the recent decision of government that Derbyshire Road will no longer be considered as a mid-tunnel dive site for the project. Whilst I acknowledge your opposition to any mid-tunnel site being used, this would lead to significantly increased costs and a greater duration of disruption.

I note that you have previously met with Mr Peter Jones, Project Director, M4-M5 Link, to discuss your concerns around the delivery of the project. I have asked Mr Jones to be available to meet with you in relation to any ongoing queries or concerns you have around the continued delivery of Stage 3 of WestConnex.

Please contact Ms Nicole Ryan, Principal Manager Stakeholder Engagement, on (02) 8099 9298 or by email at Nicole.Ryan@westconnex.com.au to arrange a meeting.

Yours sincerely

Stuart Ayres MP
Minister for Western Sydney
Minister for WestConnex
Minister for Sport

To: Stuart Ayres, Minister for WestConnex

Cc: Maryanne Graham, SMC

22 May 2017

Dear Mr Ayres

M4-M5 Link Concept Design

We refer to the WestConnex M4-M5 Concept Design (Concept Design) released on 12 May 2017 by Sydney Motorway Corporation (SMC) on behalf of the NSW Government.

The Coalition of groups against WestConnex wrote to Minister Ayres and Ms Maryanne Graham from Sydney Motorway Corporation on 14th May 2017 requesting that SMC urgently amend and reissue the Concept Design, because of its many issues identified by the Coalition groups. Ms Maryanne Graham replied advising us that; 'we have uploaded a full high-resolution version as well as each chapter separately which resolves this issue. In keeping with our commitment to reduce printed material we are providing limited print versions to key locations within the corridor. These include the administration centres and libraries of the Inner West, Canada Bay and City of Sydney councils and our Community Information Centres at Burwood and St Peters.'

We write to advise you that, notwithstanding this action, the Concept Design remains inadequate, does not meet its objectives and is non-compliant with SMC's obligation to consult with and inform the community. You must require SMC to immediately withdraw the Concept Design, amend and reissue it, with each of the defects set out in the attached table fully addressed.

The Concept Design is intended to provide a source of information to the community, the feedback from which will inform the Environment Impact Statement (EIS) for the M4-M5 link. SMC is required to undertake this mandated statutory consultation process in good faith and appropriately.

Instead, the Concept Design obfuscates, omits, misleads and confuses. Many have

Instead, the Concept Design obfuscates, omits, misleads and confuses. Many have contacted the Coalition groups to point out the issues we are raising in this letter and remain frustrated and dissatisfied with the quality of the document.

Clearly, SMC has mishandled the production of the Concept Design. This is a significant matter given that the design document forms the basis of pre EIS community consultation and is for basis for SMC's community information sessions.

SMC are placing the community at a disadvantage and are undermining the consultation process by issuing this sub-standard document. As the attached table sets out, SMC has failed to provide the community with complete information about the design in a manner which enables it to understand what is proposed. As a result, the entire community consultation process is compromised.

1

M4-M5 Link Community Information Sessions

In addition, we do not consider that the proposed number of community information sessions is adequate. In accordance with best practice, an initial community consultation should be held, with a follow-up session to discuss how community feedback will be incorporated into the design. Past information sessions have proved woefully inadequate, with inconsistent information being provided and many questions simply not answered.

The information sessions should not merely serve as an opportunity for SMC to put its spin on the project, but should provide honest information about the likely impacts on our communities. They should also incorporate 3D models of the design. SMC should also provide as much prominence to the known health, amenity and community disadvantages, as it gives to the touted benefits of the project. If this standard is not met, then the information sessions should not be represented by SMC as forming part of the consultation process.

M4-M5 Link 4-page flyer

The 4-page glossy flyer produced by SMC and hand-delivered to residents provides no detail about the Concept Design. It cannot be relied upon as providing any serious consultation and at best is promotional information, at the taxpayer's expense. SMC must not represent that this flyer forms part of the consultation process.

The Coalition against WestConnex therefore seeks the following:

1. The Government must immediately withdraw the Concept Design. It should be urgently amended and reissued. The serious concerns set out in this letter and attached table must be addressed. Failure to do so will constitute a failure by the Government to comply with its statutory obligation to consult with the community. The provision of this substandard document, given the investment of public money and the massive impact that this project will have across many communities, represents a serious dereliction of duty by the Government that cannot go uncorrected.
2. An undertaking by the Government that it will include a closing date for the Concept Design to ensure the community is clear about the date by which their submissions must be received to be taken into account for the purposes of the EIS.
3. Accordingly, the agreed 12-week consultation period should recommence from the date that the community is provided with a corrected document upon which they can actually comment. This amended timeline should be included in the reissued Concept Design document.
4. Written confirmation that the EIS will not be issued until after the 12-week consultation period for the Concept Design has closed. SMC needs to provide a reasonable period from the closure date of the Concept Design until the release of the EIS so as to enable any feedback received from the community to be incorporated into the EIS. The purpose of the Concept Design is to inform the EIS, so it is nonsensical to suggest that the EIS could possibly be issued during the Concept Design consultation period, as has been suggested by some SMC representatives. If the Government intends to release the EIS before the community has had an opportunity to comment and have such feedback

incorporated into the EIS, then SMC should acknowledge that the consultation process is a sham.

5. An undertaking from the Government that there will be a 12-week period for receipt of submissions for the EIS. The EIS is a complex and lengthy technical document and it is unreasonable to expect the dozens of communities who will be impacted on this project to respond in a meaningful manner within a 30-day period.

We request a response to this letter no later than COB Thursday 26 May 2017. Note that various media outlets have been provided with a copy of this letter and we will be sharing SMC's response with them.

Kindly respond to jawactiongroup@gmail.com

No WestCONnex Public Transport Now (NOW PT)

WestCONnex Action Group (WAG)

No WestConnex Annandale

Save Newtown from WestConnex

Newtown Residents Against WestConnex

Save Ashfield Park

Stop WestConnex - Glebe Forest Lodge

Camperdown Residents Aware of WestConnex (CRAW)

Rozelle Against WestConnex (RAW)

Leichhardt Against WestCONnex (LAW)

M4-M5 Link Concept Design document defects

Item	Defect	Outcome required
1. Printing	<p>The printable version of Concept Design document is 160-170MB and takes approximately 10 minutes to download. Community members have advised us that the document simply cannot be downloaded due to its memory size.</p> <p>Many users have reporting difficulties in emailing the document, due to its file size</p>	<p>SMC to provide a Concept Design document that is able to be downloaded by community members.</p> <p>SMC to ensure that the online version can be downloaded and readily emailed.</p>
2. Format of printed version	<p>SMC have designed the Concept Design document to be printed on A3 paper. While there is much use by SMC of large pictures, inexplicably SMC have chosen a very small font size and once printed on A4 it is difficult to read.</p> <p>This disadvantages those without access to a printer that accommodates A3 paper.</p>	SMC to reformat the Concept Design document so that font size is adequate when printed in A4
3. Format of on-line version	<p>SMC's on-line version of the Concept Design shows two pages at a time in landscape format.</p> <p>When looking at the document in this format, the font size is unreadable and the detail of the images and diagrams cannot be discerned.</p> <p>When one zooms in, in order to be able to read the text or see the detail, the whole of the page cannot be viewed on the screen. For example, where a street diagram is depicted, the accompanying text cannot be read on the same screen. This is an impediment to understanding and interpreting the design.</p>	SMC to reformat the on-line Concept Design so that each page can be viewed on screen without the need to zoom in.

4. Mobile phone version	SMC's Concept Design cannot be viewed at all on a mobile phone.	SMC to produce mobile phone version.
5. Accessibility	SMC's Concept Design document does not meet the NSW Government's Accessibility requirements, which are intended to ensure that content is available to the widest possible audience, including visually impaired readers. Any text should be printed to an appropriate font size and type and images should be clearly depicted, so as to be capable of being read, as well as printed.	SMC to produce a Concept Design document that meets the NSW Government's Accessibility requirements

4

Item	Defect	Outcome required
6. Availability	SMC has provided only one hard copy of the Concept Design at local libraries. This is inadequate and, given the issues with printing outlined above, it means that most readers are forced to view the document solely on screen.	SMC should provide bound A3 copies to all who request at SMC's expense. This can be done via a request form on the westconnex.com.au website.
7. Inaccurate, confusing and misleading content	a) The cover page, which depicts the 'Rozelle interchange' is different from the image on page 44. SMC advised a community member that the cover image is not to be relied upon as it an outdated image and the image on page 44 is accurate. The cover page image chosen	SMC to reissue omitting the out of date cover page image.

	<p>by SMC is therefore misleading.</p> <p>b) The 'Rozelle interchange' as described by SMC is actually also in Lilyfield and SMC's description, used throughout the document is therefore misleading residents of Lilyfield who may think they are not impacted.</p> <p>c) The trees SMC depicts via the artists' impressions would take dozens of years to reach the height shown. SMC is misleading the community because they suggest an outcome that cannot be guaranteed by them.</p> <p>d) SMC has used diagrams of the tunnel route that are not consistent in scale. For example, the proposed tunnel illustrated in such diagrams does not reflect its scale of eight lanes, resulting in a tunnel footprint which is misleading. Therefore the 'proposed alignment' of the tunnel, which is supposed to be disclosed in the Concept Design, is simply unclear.</p> <p>e) The images used by SMC do not depict scale and therefore the heights of the ventilation stacks is not disclosed, nor readily apparent.</p> <p>f) The legends in SMC's street diagrams do not contain a key to all of the information</p>	<p>SMC to amend to refer to the Rozelle/Lilyfield Interchange.</p> <p>SMC to provide images that show what the green spaces will look like upon completion and to include clear and prominent disclaimers.</p> <p>SMC to address points d) to j) by providing new diagrams and images.</p> <p>SMC to ensure that all touted benefits are accompanied by appropriate disclaimers.</p>
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Item	Defect	Outcome required
	<p>in the map. In some parts, it is not clear what tunnels are proposed or their direction.</p> <p>g) Even in SMC's high-resolution version it is hard to work out what and where the numbered items are on the diagrams as they are in such small font.</p> <p>h) SMC have not made it possible to ascertain whether the indicative tunnel routes are above or underground, as the lines cross over each other in parts.</p> <p>i) SMC's depiction of tunnel route and the arrows simply do not make sense.</p> <p>j) SMC does not make it clear which 'portals' are for tunnel entry and which are for tunnel exit.</p>	
8. Omission of images of adverse features	<p>SMC have included artists' impressions of features that will be sold as benefits to the community such as playing fields and parkland. However, SMC has not included any pictures of features that will be of serious concern to the community such as unfiltered ventilation stacks and tunnel portals in Lilyfield and Rozelle.</p> <p>SMC do not provide an artist's impression of the ventilation facility on Victoria Road and the ventilation towers in Lilyfield at the end of the Crescent are a small detail in the image offered.</p> <p>The effect of this is that SMC minimises the attention that the community will give to these elements. As a result, the community may not make objections or give feedback in relation them.</p>	<p>SMC to reissue the Concept Design with images depicting unfiltered ventilation stacks and portals in a way that truthfully shows their scale and how they will look from the standpoint of pedestrians, drivers on local roads and residents and not just bird's eye view.</p>

9. Incomplete information about construction vehicles and location of worker parking	SMC have omitted information about proposed worker contractor parking and how construction trucks will enter and exit construction sites. SMC have advised that 250 worker car parks will be required for the proposed dive site at Dan Murphys, which is a narrow site with limited parking. By omitting this information, SMC are minimising the potential impact of the proposed dive site. SMC have neither acknowledged nor addressed any of the identified traffic and	SMC to incorporate their proposals for worker parking and construction truck entry and egress in the Concept Design.
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Item	Defect	Outcome required
	safety issues at the Darley Road or Camperdown proposed dive sites. These omissions make it impossible for the community to comment meaningfully on the proposed dive sites.	
10. Omission of location of schools, aged care facilities, child care centres and healthcare facilities	SMC have omitted to include the location of schools, aged care facilities, child care centres and healthcare facilities, all of which will be impacted by proximity to high volume traffic, unfiltered ventilation stacks and portals.	SMC to include locations of all schools, aged care facilities, child care centres and healthcare facilities in all map style images that include the location of unfiltered ventilation stacks and portals

11. Omission of information about traffic impacts	SMC have omitted to acknowledge the impact of increased traffic congestion both during and after the construction phase and the safety issues arising from heavy vehicle movements in local streets.	SMC to acknowledge these impacts in the Concept Design.
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From: [REDACTED]
Sent: Sun, 15 Oct 2017 20:47:14 +0000
To: [REDACTED]
Subject: FW: Submission Details for David Golan (object)

From: system@accelo.com On Behalf Of David Golan
Sent: Monday, 16 October 2017 7:47:03 AM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for David Golan (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: David Golan
 [REDACTED]

Address:
 [REDACTED]

Rozelle, NSW
 2039

Content:

Hi,

I'm writing to express my disapproval of the iron cove smoke stacks

I've lived in this community most of my life and am appalled that such industrial sized stacks are being created right next to such a family community like Rozelle. This community is not a transient stop on Victoria Rd, we have kids schools and multiple child care centres in the neighbourhood. I myself suffer from asthma and fear this is just going to make things worse for me and the local children.

Alongside a beautiful picturesque rozelle bay, why would you want to create such a monstrosity when it could be avoided.

We have heard you have the technology and funds to not need the smoke stack here. So please move it. There is community here that opposes it.

Thank you for listening.

Regards

David.

[REDACTED]
 Submission: Online Submission from David Golan (object)
https://majorprojects.accelo.com/?action=view_activity&id=227891

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

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

From: [REDACTED]
Sent: Sun, 15 Oct 2017 20:54:15 +0000
To: [REDACTED]
Subject: FW: Submission Details for Dejan Simovic (object)

From: system@accelo.com On Behalf Of Dejan Simovic
Sent: Monday, 16 October 2017 7:54:02 AM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for Dejan Simovic (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Dejan Simovic
[REDACTED]

Address:
[REDACTED]

Lilyfield, NSW
2040

Content:

I have objection to proposed project and its EIS related to impact this project will have to air pollution, dust in air and noise and vibration impact it will have on existing and future residents.

I live in close proximity of Rozelle Rail Yards and proposed exhausts from tunnels that will be unfiltered from air pollutants and dust particles from tunnel traffic. Rozelle already is the area of most polluted air in NSW and Australia and adding more pollution would be irresponsible and criminal.

Equally, vibration and noise from additional traffic on West Link and surrounding streets would further diminish quality of environment and affect health of thousands of residents for generations to come.

It is unacceptable and criminal for government to sacrifice well-being of residents along the Westconnex route for commercial gain of corporate bodies.

[REDACTED]
 Submission: Online Submission from Dejan Simovic (object)
https://majorprojects.accelo.com/?action=view_activity&id=227893

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

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

From: [REDACTED]
Sent: Sun, 15 Oct 2017 20:59:40 +0000
To: [REDACTED]
Subject: FW: Submission Details for [REDACTED] (object)

From: system@acelo.com On Behalf Of [REDACTED]
Sent: Monday, 16 October 2017 7:59:02 AM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for [REDACTED] (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: [REDACTED]

Email: [REDACTED]

Address:
 [REDACTED]
 [REDACTED]

Content:

I submit my objection for the following reasons :

⋅ 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.

⋅ 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.

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

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

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

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

⋅ The RMS has previously identified the Darley Rd site in Leichhardt as the third most dangerous traffic hazard in the Inner West. The NSW Land and Environment Court found that the location of the site couldn't safely deal with 60 bottle truck movements a week, but the M4/M5 EIS shows that more than 800 vehicles including hundreds of heavy ones will use the site each day as part of construction of M4M5 Link. HOW IS THIS POSSIBLE? why are the already acknowledged impacts being ignored.

⋅ 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.

⋅ 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.

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

⋅ The 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.

⋅ The impacts on The Crescent and Annandale are massive and were not sufficiently revealed in the Concept Design to enable residents to give feedback on the negative impacts on communities and businesses in the area.

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

⋅ The EIS states that after the M4-M5 opens, that traffic on Darley Road will increase by 4%. There is no benefit in the overall project for residents. During construction westbound traffic will increase on Darley Road by 37%. This increase in traffic for a period of up to five years will make it hazardous to

cross the road and access the light rail and travel to Blackmore oval, the bat run, the dog park and the Leichhardt pool. In addition, it will drastically increase both local traffic and outer area traffic at peak commute times. We therefore object to the location of this site based on the unacceptable traffic impacts it will have on road users and on residents.

⋅ 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.

⋅ Along with the widening of the Crescent at Annandale the White's Creek bridge is to be rebuilt. This will mean that the road in this area will be reduced in width as first one side of the bridge is rebuilt followed by the other. Added to the additional volume of trucks from the Rozelle Rail Yards, the Crescent Civil site and the Camperdown site this is going to lead to massive congestion on Johnston St and all along the Crescent towards Ross St and make it virtually impossible for residents to exit and return to their local area. It is most likely that the commercial sectors of the Tramsheds development will be badly affected.

⋅ 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.

⋅ One toll road leads to another 3 being proposed. The EIS's for the M4 East and the New M5 argued the case that serious congestion created near interchanges would be solved once the M4/M5 was built. Now it seems this is not the case and more roads will be needed to relieve the congestion - WHERE DOES THIS END? According to the M4/M5 EIS the real benefits will depend on building the Western Harbour Tunnel, the Airport Link and a tollway heading South. None of these projects have been planned, let alone approved but yet are part of addressing the congestion impacts acknowledged for the M4/M5link project. Given this how is it possible to know or address the impacts of the M4/M5 Link, unless this is just yet more justification for yet more roads?

⋅ 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.

⋅ 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.

⋅ 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.

⋅ 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.

⋅ No noise barriers have been proposed. This is unacceptable and appropriate noise barriers should be included in the EIS for consideration. (Executive Summary xvii)

⋅ 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.

⋅ 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.

⋅ 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.

⋅ 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 needs to detail the increased risk in crashes that will be caused by the additional 170 vehicles a day that are proposed to enter and leave Darley Road during the construction period.

⋅ The EIS states that by 2033 Ross St will see an increase of 80 heavy vehicles a day at Peak periods. The greatest increase of Heavy vehicles at the PM peak will be in Johnston Street, which will see an increase of about 30-50 vehicles when compared to the 'without project' scenario. At Catherine St there will be an increase of 30 heavy vehicles a day at Peak periods. These streets will see a huge

increase in Heavy vehicle movements if Stage 3 is built. The increase would be roughly half this amount if the project did not go ahead. Annexure Fig 26 B2 Section H

⋅ 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.

IP Address: - [REDACTED]

Submission: Online Submission from [REDACTED] (object)

https://majorprojects.accelo.com/?action=view_activity&id=227895

Submission for Job: #7485 WestConnex M4-M5 Link

https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

From: [REDACTED] <campaigns@good.do>
Sent: Monday, 16 October 2017 7:51 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.

1. 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.
2. 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.
3. I am concerned that the AECOM, the company responsible for the EIS, always approves knocking down heritage buildings if the project requires it. It doesn't how much value it holds for the community, it must always be destroyed.
4. 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.
5. Rozelle Interchange and surrounds will experience increased traffic with associated noise and air pollution—most particularly at the Crescent, Johnson St and Catherine St, Annandale/Lilyfield/Leichhardt and Ross Street, Glebe. These streets are already highly congested at peak times and with a massive number of extra truck movements and traffic associated with construction, these streets will become gridlocked during peak times.
6. 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.
7. The construction and operation of the project will result in 51 property acquisitions. We object to the project in its entirety because of this impact. We note that a number of long-standing businesses have been acquired and that many families and businesses in earlier stages have been forced to go to court to seek fair compensation. We object to the acquisition in particular of the Dan Murphys site. The business was substantially renovated and a new business opened with full knowledge of the likely acquisition. We object to it being acquired and compensated in this circumstances and call on the Government to investigate the circumstances which led to this occurring (Executive Summary xvii)
8. The RMS has previously identified the Darley Rd site in Leichhardt as the third most dangerous traffic hazard in the Inner West. The NSW Land and Environment Court found that the location of the site couldn't safely deal with 60 bottle truck movements a week, but the M4/M5 EIS shows that more than 800 vehicles including hundreds of heavy ones will use the site each day as part of construction of M4M5 Link. HOW IS THIS POSSIBLE? why are the already acknowledged impacts being ignored.

9. 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.
10. 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.
11. 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.
12. 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.
13. The impacts on The Crescent and Annandale are massive and were not sufficiently revealed in the Concept Design to enable residents to give feedback on the negative impacts on communities and businesses in the area.
14. 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.
15. The EIS states that after the M4-M5 opens, that traffic on Darley Road will increase by 4%. There is no benefit in the overall project for residents. During construction westbound traffic will increase on Darley Road by 37%. This increase in traffic for a period of up to five years will make it hazardous to cross the road and access the light rail and travel to Blackmore oval, the bat run, the dog park and the Leichhardt pool. In addition, it will drastically increase both local traffic and outer area traffic at peak commute times. We therefore object to the location of this site based on the unacceptable traffic impacts it will have on road users and on residents.
16. 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.
17. Along with the widening of the Crescent at Annandale the White's Creek bridge is to be rebuilt. This will mean that the road in this area will be reduced in width as first one side of the bridge is rebuilt followed by the other. Added to the additional volume of trucks from the Rozelle Rail Yards, the Crescent Civil site and the Camperdown site this is going to lead to massive congestion on Johnston St and all along the Crescent towards Ross St and make it virtually impossible for residents to exit and return to their local area. It is most likely that the commercial sectors of the Tramsheds development will be badly affected.
18. 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.
19. One toll road leads to another 3 being proposed. The EIS's for the M4 East and the New M5 argued the case that serious congestion created near interchanges would be solved once the M4/M5 was built. Now it seems this is not the case and more roads will be needed to relieve the congestion – WHERE DOES THIS END? According to the M4/M5 EIS the real benefits will depend on building the Western Harbour Tunnel, the Airport Link and a tollway heading South. None of these projects have been planned, let alone approved but yet are part of addressing the congestion impacts acknowledged for the M4/M5link project. Given this how is it possible to know or address the impacts of the M4/M5 Link, unless this is just yet more justification for yet more roads?
20. 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.

21. 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.

1. 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.
2. 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.
3. No noise barriers have been proposed. This is unacceptable and appropriate noise barriers should be included in the EIS for consideration. (Executive Summary xvii)
4. 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.

1. 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.
2. 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.
3. 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 needs to detail the increased risk in crashes that will be caused by the additional 170 vehicles a day that are proposed to enter and leave Darley Road during the construction period.

4. The EIS states that by 2033 Ross St will see an increase of 80 heavy vehicles a day at Peak periods. The greatest increase of Heavy vehicles at the PM peak will be in Johnston Street, which will see an increase of about 30-50 vehicles when compared to the 'without project' scenario. At Catherine St there will be an increase of 30 heavy vehicles a day at Peak periods. These streets will see a huge increase in Heavy vehicle movements if Stage 3 is built. The increase would be roughly half this amount if the project did not go ahead. Annexure Fig 26 B2 Section H
5. 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.
6. 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 we have fewer parks than almost any suburb in Sydney so this would have a direct impact on local people. Buruwan Park also lies on 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 get 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.
7. 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.
8. 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."
9. Alternative access route for trucks – Leichhardt: The EIS states that there are 'investigations' occurring into alternative access to the Darley Road site. The EIS does not provide any detail on which residents can comment about alternative access which would keep trucks off Darley Road. The plans for alternative access should be expedited. It should be a condition of approval that the alternative access is confirmed and that no spoil trucks are permitted to access Darley Road due to the unacceptable noise, safety and traffic issues that the current proposal creates.
10. 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.
11. 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.
12. The EIS refers to be construction impacts as being 'temporary'. I do not consider a five year construction period to be temporary.
13. 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.
14. Research about roads clearly demonstrates that roads create congestion. The WestConnex project is no different and the EIS clearly indicates that this is an impact of the M4/M5 and the consequent roads that will

follow. WHERE WILL THIS END AS THE m4/m5 Link EIS itself indicates the RMS is already hard at work considering how to solve these problems – of congestion caused by roads.

15. It has estimated that if construction goes ahead, some homes in Darley St Leichhardt will have a truck on average every 4 minutes just metres from their bedrooms. If experience in Haberfield, Kingsgrove, St Peters and Alexandria is anything to go by, residents can again expect the actual experience to be worse than predicted by the EIS. HOW IS THIS POSSIBLE? why have the serious and legitimate concerns raised by the residents not even been acknowledged.
16. The substation and water treatment plant should be moved to the north end of the site near the City West link. This will mean that the site is less visible to residents and most pedestrian access is at this end. There are no homes that will have direct line of site of the facility if it is moved. This will also enable direct pedestrian access to the light rail without the need to use the winding path at the rear of the site which creates safety issues and adds to the time required to access the light rail stop.
17. 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?
18. 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.
19. We object to the selection of the Darley Road site on the basis that it provides for daily movements of 170 heavy and light vehicles accessing Darley Road. This creates an unacceptable risk to the safety of pedestrians accessing the North Leichhardt light rail stop as well as bicycle users accessing the bicycle route on Darley Road and entering Canal road to join the dedicated bike paths on the bay run. Many school children cross at this point to walk to Orange Grove and Leichhardt Secondary College. The EIS states that an alternative truck movement is proposed which involves use of the City West Link with no trucks to access Darley Road. The selection of Darley Road should not be approved if it involves any truck movements on Darley Road, which is what it currently provides.
20. 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.
21. 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).
22. I do not consider it acceptable that cycling/pedestrian routes should be changed for four years in Annandale and Rozelle in ways that will make cycling more difficult and walking less possible for residents with reduced mobility. These are vital community transport routes.
23. 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.
24. 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.
25. 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
26. 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.
27. 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.

1. 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.
2. 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."
3. 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.
4. 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.
5. Rozelle Rail Yards and Rozelle Civil Site. It is clear that the most highly affected area of Stage 3 will be the Rozelle area and the massive and hugely complex Rozelle interchange. The suggestion that Westconnex is capable of building this is highly questionable. Nothing like this has been built anywhere else in the World. Considering the simple problems of dust management, noxious gasses and the handling of toxic materials like asbestos that have been so inappropriately dealt with on Stages 1 and 2 by Westconnex this intersection of Stage 3 is a disaster waiting to happen and should definitely not be allowed to proceed without a massive investigation. What has been shown in the EIS is totally inadequate for this project to be allowed to proceed.
6. 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.
7. Vegetation: Leichhardt. The mature trees on the Darley Road site should be preserved. If any trees are removed during construction it should be a condition of approval that they are replaced with mature trees.
8. Insufficient time has been given for the community to prepare submissions to the EIS, especially when one considers that whole neighbourhoods affected by the project were not even notified during the concept design period. e.g Newtown, east of King St.
9. 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.
10. The EIS states that property damage due to ground movement may occur. We object to the project in its entirety on this basis. The EIS states that 'settlement, induced by tunnel excavation, and groundwater drawdown, may occur in some areas along the tunnel alignment'. The risk of ground movement is lessened where tunnelling is more than 35 metres. However, some tunnelling is at less than 10 metres. This proposed tunnel alignment creates an unacceptable risk of ground movement. In addition, the EIS states that there are a number of discrete areas to the north and northwest of the Rozelle Rail Yards, to the north of Campbell Road at St Peters and in the vicinity of Lord Street at Newtown where ground water movement above 20 milliliters is predicted 'strict limits on the degree of settlement permitted would be imposed on the project' and 'damage' would be rectified at no cost to the owner. would be placed (Executive Summary, xvii -iii). The project should not be p

ermitted to be delivered in such a way that there is a known risk to property damage that cannot be mitigated to an acceptable level of risk.

1. The EIS identifies hundreds of risks at different construction sites. In relation to these risks the EIS recommends proceeding despite the risks; or seeking a way to mitigate risks during the "detailed design" phase. That phase excludes the public altogether. That is, the M4/M5 should be approved with no calculation of risks or what mitigation may mean for impacted residents.
2. Where is the commitment to community consultation and to long term planning when the EIS for the M4/M5 Link is released before any response to the extensive community feedback on the M4-M5 Link concept design could possibly have been seriously considered. This demonstrates deep government contempt for the people of NSW and the communities of the Inner West of Sydney in particular.
3. Unfiltered stacks anywhere in Sydney are not unacceptable. There must be a review of the NSW government's unacceptable policy on this issue. I am appalled that the ex Minister for Planning Rob Stokes who approved the New M5 and unfiltered stacks in St Peters and Haberfield would declare that he would not have them in his own area. How can residents have any trust in a process that is underpinned by such hypocrisy.
4. Out of hours work – Pyrmont Bridge Road site – Up to 14 'receivers' at this site are predicted to have impacts from high noise impacts during out of hours work for construction and pavement works for approximately 2 weeks caused by the use of a rock-breaker. Again, no plans to relocate or compensate residents affected is provided in the EIS (EIS, XV) The only mitigation contained in the EIS is that the use of the road profiler is to be limited during out of hours works 'where feasible.' (Table 5-120) In other words, there is no mitigation whatsoever for residents affected by daytime noise and a possibility that they will be similarly affected out of hours where the contractor considers that it isn't feasible to limit the use of the road profiler. This represents an inadequate response to managing these severe noise impacts for residents.
5. The Inner West Greenway was considered but not assessed as a cumulative impact. One of the claimed project benefits of the proposal is improved east/west crossings of Parramatta Rd for pedestrians/bikes and the Greenway would achieve this and should be assessed and provided as part of the project. The Greenway was part of inner west LR project before it was deferred in 2011 and Inner West Council has done extensive work on it.
6. King Street Gateway is not included in modelling or Cumulative impact assessment however will alter the road geometry and capacity adjacent to the project.
7. Acoustic shed – Pyrmont Bridge Road site – Despite setting out the noise impacts of construction at this site, the lowest grade acoustic shed is proposed as mitigation. The EIS states that the Acoustic shed performance should be 'upgraded' and the site hoarding increased to 4 metres 'in select areas.' (EIS, 10-119). No detail is provided as to how effectively these enhancements will manage the noise and vibration impacts of construction.
8. 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).
9. 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.
10. Why the so called 'King Street Gateway' been excluded in the analysis of cumulative impacts of other projects ?
11. I am concerned that the AECOM, the company responsible for the EIS, always approves knocking down heritage buildings if the project requires it. It doesn't how much value it holds for the community, it must always be destroyed.
12. No workers associated with the WestConnex project should be permitted to park on local streets. Parking is at a premium in this area and many residents 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 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.
13. Targets for renewable energy and carbon offsets are not aligned with NSW government policy. (Table 22-8)
14. Targets for renewable energy and offsets are unclear.

15. Human health risk (Executive Summary xvi) – The EIS states that there may be a ‘small increase in pollutant concentrations’ near surface roads. The EIS states that potential health impacts associated with changes in air quality (specifically nitrogen dioxide and particulates) within the local community have been assessed and are considered to be ‘acceptable.’ We disagree that the impacts on human health are acceptable and object to the project in its entirety because of these impacts.
16. The TfNSW website says “The Sydney Metro West project is Sydney’s next big railway infrastructure investment” but the Cumulative Impact assessment by AECOM (App C) does not include West Metro. A business case for West Metro should be completed before determination of the Project.
17. The Inner City Regional Bike Network has not been included among projects assessed under Cumulative Impacts. It is identified by Infrastructure Australia as a Priority Initiative and should be included.
18. 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.
19. The City West Link Eastbound AM and PM peak hour and other locations. “Table 7-19 shows that several locations are forecast to exceed theoretical roadway capacity with the increased background traffic and the construction traffic in the 2021 AM and PM peak hours. However, traffic on the majority of these roads would exceed their theoretical capacity even without the construction traffic, simply due to the growth in background traffic”. So in the full knowledge that this area will be at capacity in 2021, massive amounts of construction traffic are going to be added for the whole construction period of 5 years. Even on completion it is stated in the EIS that traffic will be worse in this area than ‘without the project’. This categorically shows that the planning of Westconnex is totally inadequate and needs major changes. It also shows that when completed Westconnex will not work. It is abundantly obvious that Rail/Metro is the only option to radically overhaul

1 Sydney’s failed transport systems

1. Noise mitigation – Leichhardt. The noise mitigation proposed in the EIS is unacceptable. No detail of noise walls is provided, giving residents no opportunity to comment on whether final impacts are acceptable. This is despite the fact 36 homes are identified in the EIS as severely affected by construction noise. The acoustic shed proposed is of the lowest grade and does not cover the entire site, resulting in noise impacts from the movement of trucks in and out of the tunnel access point. The highest grade acoustic shed should be provided, with the shed covering the entire site. The additional noise mitigation such as noise walls, need to be set out in detail so that residents can properly comment on the impacts.
2. The proposal for a permanent water treatment plant and substation to the south of the site on Darley Road will prevent direct pedestrian access to the light rail station. It will affect the future uses of the site once the project is completed. The facility is out of step with the area which is comprised of low rise homes and detracts from the visual amenity of the area. This site is a pedestrian hub and will be a visual blight for pedestrians, bike users and the homes that have direct line of sight to the facility. It should not be permitted on this site.
3. The original objectives of the project specified improving road and freight access to Sydney Airport and to Port Botany. Neither Stage 2 or 3 provides such access. Both the new M5 and the new M4-M5 Link will dump 1,000s more per day onto the roads to the Airport which are already at capacity.
4. The EIS indicates that 36 homes will have unacceptable noise impacts for extended periods at the Darley road construction site. The EIS does not mention the cumulative impact of aircraft noise in the Leichhardt or St Peters area, and therefore does not reflect the true impact of construction noise on the amenity of nearby residents and businesses. The noise impacts of construction are not able to be mitigated to an acceptable level and the EIS should not be approved on this basis.
5. It is outrageous to suggest that four unfiltered stacks would be built in one area, Rozelle
6. Truck routes – Leichhardt: No trucks should be permitted on Darley Road or local roads in Leichhardt or Lilyfield. The EIS proposes that all trucks will arrive at the Darley Road civil and tunnel site from Haberfield and travel along Darley Road to the site, with a right-hand turn now permitted into James Street. The proposed route will result in a truck every 3-4 minutes for 5 years running directly by the small houses on Darley Road. These homes will not be habitable during the five-year construction period due to the unacceptable noise impacts. The truck noise will be worsened by their need to travel up a steep hill to return to the City West Link, so the noise impacts will affect not just those homes on or immediately adjacent to Darley Road. The proposal to run trucks so close to homes is dangerous and there have been two fatalities on Darley Road at the proposed site location. The EIS does not propose any noise or safety barriers to address this. Despite the unacc

ceptable impact to nearby homes, there is no proposal for noise walls, nor any mitigation to individual homes.

1. 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.
2. 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
3. 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.
4. 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.
5. 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.
6. Table 6.1 in Appendix Q (Social and Economic impact) is not an accurate report on the concerns of residents. It downplays concerns of Newtown, St Peters and Haberfield residents. It does not even mention concerns about additional years of construction in Haberfield and St Peters. The raises the question of whether this is a result of the failure of SMC to notify impacted residents including those on the Eastern Side of King Street and St Peters about the potential impacts of the M4 M5
7. 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.
8. The operational Green House Gas (GHG) assessment is based on the WestConnex Road Traffic Model version 2.3 (WRTM v2.3). This model has major flaws and the unreliable outputs of the model put into question the GHG assessment.
9. Noise from trucks entering and exiting the site – Pyrmont Bridge Road site – The EIS states that there will be noise 'exceedances' for trucks entering and exiting the site (Table 5-120) No detail is provided as to the level of any such 'exceedance'. Nor does it propose any mitigation other than investigations into 'locations' where hoarding above 2 metres can be utilized to control trucks in the queuing area. This does not result in any firm plans to manage the noise. Nor is enough detail provided so that those affected can comment on the effectiveness of this proposed mitigation measure.
10. The assessment states that there will be a net increase in GHG emissions in 2023 under the 'with project' scenario, however under the 2023 'cumulative' scenario, there will be a net decrease in emissions (page 22-15). However, as the 'cumulative' scenario includes the Sydney Gateway and Western Harbor Tunnel projects, which are not yet confirmed to proceed, 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.
11. Emissions were not modelled beyond 2033. This is an omission, 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
12. Visual amenity – Pyrmont Bridge Road site – The EIS acknowledges that visual impacts will occur during construction. However it does not propose to address these negative impacts in the design of the project. This is unacceptable and the EIS needs to propose walls, plant and perimeter treatments and other measures at appropriate locations to lessen the impact on visual amenity. (Executive Summary xviii)

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

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]

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

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.

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

- The addition of 70-100 light vehicle movements day in Leichhardt will result in our small, congested streets, which are already at capacity and suffering parking shortages, will have the added impact of workers travelling to and from the site and parking in local streets. There will be rat running. The EIS should provide an agreed route (using arterial roads only) that can be used by all vehicles associated with the project.
- According to the EIS, buses travelling to the CBD will be slower, despite the construction of a tunnel between Iron Cove and the Anzac Bridge. Bus travel times along Parramatta Road will improve, but only because bus lanes would be extended. This could be achieved without WestConnex and for several billions of dollars less.
- It is stated that the hugely expensive Stage 3 M4/M5 link is required as a link between the two motorways. This is totally untrue. The A3 is the primary eastern link between the two motorways and it is described in the State Road network system as the M4- M5 Connector.
- I object to the assessment of the removal of buildings, other rail infrastructure and vegetation on the Rozelle Railway Yards being done in advance of this EIS. The RMS environmental assessment process is not publicly accountable. These works were part of the WestConnex project and should have been assessed as part of Stage 3.
- Significant improvements in rapid public transport are required for significant urban renewal. The experience in Sydney is that public transport is a strong and effective catalyst for urban renewal e.g. Green Square; Ultimo-Pyrmont with light rail; the Anzac Parade corridor, again with light rail; and Sydney Metro City and South West at Waterloo and along the Bankstown Line. The key ingredient is the political will to reallocate road space to rapid transit, or invest in dedicated rail solutions.
- To the west there are the M7, A6 and A3 connections. There has been no modelling provided of whether with appropriate upgrades these connections might provide far more cost effective and time efficient connections, particularly given their alignments would service multiple demand corridors.
- The EIS does not set out a credible strategic rationale for WestConnex. There is no informed discussion on the economic geography of Sydney, and the role an integrated transport system has to play in meeting the needs of businesses and residents.

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

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- The EIS uses criteria to assess the impact of existing walking and cycling routes that will need to be diverted as a result of the M4-M5 Link. The criteria are based on distance only and exclude the additional travel time taken to complete the diversion. This approach is flawed and should also consider travel time – if it did, this would completely change the assessment of the proposed removal of the existing pedestrian and cycle bridge over City West Link. (P 8-71, Table 8-50). Further, the EIS is silent as to whether the existing pedestrian and cycle bridge over City West Link will be replaced post-construction (P 8-73)
- The assessment of Strategic Alternative 3 (Travel Demand Management) should:
 - Identify key network capacity issues
 - Consider the opportunity for travel demand management measures to address the road network capacity constraints. The measure should aim to retime, re-mode or reduce trips that make less productive use of congested road space.
 - Draw on a process of multi-modal transport modelling and economic assessment to inform the analysis and assessment
- The EIS does not provide appropriate parking for the estimated 100 or so workers that the EIS states will work every day at the site, while other equivalent sites have allocated parking for such workers (Northcote Civil site (150)) and Parramatta Road East Civil site (140). It is also noted that the EIS provides for loss of 20 residential parks on Darley Road. Local streets are at capacity already because of the lack of off-street parking for many residents and the Light Rail stop which means that commuters use local streets. The EIS states that workers 'will be encouraged to use public transport.' the EIS needs to mandate that no trucks or construction vehicles are to park in local streets. There needs to be a requirement that is enforceable that workers use the Light Rail stop which is adjacent to the site or a plan to bus in workers
- 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.
- The Rozelle Interchange will prevent major redevelopment in the Rozelle area. This area has been identified by the NSW Government as a major opportunity for urban renewal for over 20 years. Light construction vehicle routes – the EIS acknowledges that these vehicles will use 'dispersed' routes (8-62). In other words, construction vehicles will use and park on local roads. The EIS does not propose any management as to which roads they use.

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Attention Director
Application Number: SSI 7485

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

Application Name:
WestConnex M4-M5 Link

Name:

Signature:

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

- The EIS should not be approved as it does not contain any certainty for residents as to what is proposed. The EIS states 'the detail of the design and construction approach is indicative only based on a concept design and is subject to detailed design and construction planning to be undertaken by the successful contractors.' Therefore this entire process is a sham as the extent to which concerns are taken into account is not known as the contractor can simply make further changes. As the contractor is not bound to take into account community impacts outside of the strict requirements and as the contractor will be trying to deliver the project as quickly and cheaply as possible, it is likely that the additional measure proposed with respect to construction noise mitigation for (example) will not be adopted. The EIS should not be approved on the basis that it does not provide a reliable basis on which to base the approval documents. It does not provide the community with a genuine opportunity to provide meaningful feedback in accordance with the legislative obligation of the Government to provide a consultation process because the designs are 'indicative' only and subject to change. Because of this the EIS is riddled with caveats and lacks clear obligations and requirements 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
- The Rozelle Rail Yards are a totally inappropriate area to create a new recreational area because the area will be highly polluted by unfiltered Pollution Stacks and Tunnel Portals. In the EIS it is referred to as an idealized area. "It is envisaged that the quantum of active recreation within the Rozelle Rail Yards would be further developed by others as projects such as The Bays Precinct are developed. The concept plan provides spaces that could include an array of active recreation opportunities and even community facilities such as gardens or a school." The suggestion that this would be a suitable location for a School is just beyond belief and demonstrates that those who have put these plans together are either staggeringly ignorant or totally delusional! At a time when major World cities are doing all they can to address the dire problems of pollution this is an appalling suggestion that is totally out of touch.
- The EIS states that spoil handling at the Pyrmont Bridge Road Tunnel Site (C9) will "occur 24 hours a day, seven days a week" for about four years. Given the land use surrounding the site is dense residential, what mitigation measures will be used to control noise, light spill, etc. outside normal business hours? Have alternative living arrangements and/or compensation been considered? (P 8-55)

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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.

Submission to:

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

Signature:.....

Attn: Director – Transport Assessments

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

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

- Acoustic shed - Pyrmont Bridge Road site - Despite setting out the noise impacts of construction at this site, the lowest grade acoustic shed is proposed as mitigation. The EIS states that the Acoustic shed performance should be 'upgraded' and the site hoarding increased to 4 metres 'in select areas.' (EIS, 10-119). No detail is provided as to how effectively these enhancements will manage the noise and vibration impacts of construction.
- The Inner City Regional Bike Network has not been included among projects assessed under Cumulative Impacts. It is identified by Infrastructure Australia as a Priority Initiative and should be included.
- 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
- Visual amenity - Pyrmont Bridge Road site - The EIS acknowledges that visual impacts will occur during construction. However it does not propose to address these negative impacts in the design of the project. This is unacceptable and the EIS needs to propose walls, plant and perimeter treatments and other measures at appropriate locations to lessen the impact on visual amenity. (Executive Summary xviii)
- Of the six areas of disturbance and 11 Historical Archaeological Management Units (HAMUs) identified in Chapter 20 of the EIS, none are within the Sydney LGA.
- Increased traffic cannot be accommodated in Central Sydney. It will further impede pedestrian movement and comfort and undermine easy access to public transport and reduce access to jobs over large areas of the city. It will undermine the attractiveness of Central Sydney to internationally competitive high productivity firms and their potential employees. Overall productivity is adversely affected.
- Map 2 in Vol 1A Chap 5 Pt 1 shows four intersecting tunnels, each 3 lanes wide, with four toll locations, apparently converging under Mayes, Young, Ferris, Moore, Catherine, Hill, John, Emma, Styles, Ilka, Paling, and the many other surrounding streets. The construction of four intersecting tunnels at varying depths in a spaghetti junction network would exacerbate ground settlement and vibrations, and cause homes most of which are Federation or earlier above the Interchange to be seriously impacted.

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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

Signature:.....

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 Assessments

Application Number: SSI 7485

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- The City West Link Eastbound AM and PM peak hour and other locations. "Table 7-19 shows that several locations are forecast to exceed theoretical roadway capacity with the increased background traffic and the construction traffic in the 2021 AM and PM peak hours. However, traffic on the majority of these roads would exceed their theoretical capacity even without the construction traffic, simply due to the growth in background traffic". So in the full knowledge that this area will be at capacity in 2021, massive amounts of construction traffic are going to be added for the whole construction period of 5 years. Even on completion it is stated in the EIS that traffic will be worse in this area than 'without the project'. This categorically shows that the planning of Westconnex is totally inadequate and needs major changes. It also shows that when completed Westconnex will not work. It is abundantly obvious that Rail/Metro is the only option to radically overhaul Sydney's failed transport systems
- I am completely opposed to approving a project in which the Air quality experts recommend rather than filtrating stacks extra stacks could be added later.
- 2 G Appendix P Table 5-27 of the EIS states that 43% of the Leichhardt- Glebe Precinct travel to work by Car, 21% by Bus and 5%by Rail. These are figures for 2011. These figures are being used to promote the project and suggest they are accurate today. In the case of Rail these figures are extremely questionable. The Light Rail is now hugely popular, it's use having grown enormously. It is travelling at full capacity at Peak hours. More services are being put in place. Apartment blocks are being built as close to the Light Rail corridor as possible. Residents see the Light Rail as an efficient, reliable and timely method of commuting to work. It is blatantly obvious that the Govt should be investing heavily in building and extending Light Rail, Metro and Rail. If this were pursued in a professional manner the necessity for trying to hoodwink the community into believing that Westconnex were needed would be totally unnecessary.
- The EIS was prepared by global engineering firm AECOM, which also prepared the EIS for Stages 1 and 2. When he approved these earlier stages, the then Minister for Planning Rob Stokes pointed to conditions of approval that would minimise impacts on communities. But the impacts have turned out to worse than expected.

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Signature:.....

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

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 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.
- 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)
- The EIS states that investigation would be undertaken to confirm whether the Victoria Road bridge is a potential roost site for microbats. There will be attempts to 'manage potential impacts' if confirmed. This is inadequate. The project should not be permitted to impact on vulnerable species.
- The construction and operation of the project will result in 51 property acquisitions. We object to the project in its entirety because of this impact. We note that a number of long-standing businesses have been acquired and that many families and businesses in earlier stages have been forced to go to court to seek fair compensation. We object to the acquisition in particular of the Dan Murphys site. The business was substantially renovated and a new business opened with full knowledge of the likely acquisition. We object to it being acquired and compensated in this circumstances and call on the Government to investigate the circumstances which led to this occurring (Executive Summary xvii)

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

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

- *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.*
- *The traffic around St Peters expected to be heavier because of the increased road access to the new Interchange will adversely affect our community because moving around to our parks and to the shops, to the buses and to the train stations, for pedestrians and cars, will be more difficult. Our community is being sacrificed for the marginal improvement in traffic movement elsewhere in Sydney. No measures to ameliorate the impact are mentioned. This is unacceptable.*
- *I am completely opposed to approving a project in which the Air quality experts recommend rather than filtrating stacks extra stacks could be added later.*
- *The EIS states that an alternative truck movement is proposed which involves use of the City West Link and no need for spoil trucks to access Darley Road. This proposal is supported, subject to further information about potential impacts being provided. The EIS should not be approved on its current basis which provides for 170 heavy and light vehicles accessing Darley Road on a daily basis. This will create unacceptable safety issues and noise impacts for adjacent homes while also compromising pedestrian and bicycle access to the light rail and bay run. It will also lead to truck chaos on this critical arterial road providing access to and across the City west Link. The current proposal which provides for truck movements solely on Darley Road should not be approved and approval should only be given to the alternative proposal. I repeat however my objection to the selection of this site altogether, but propose the least worst impact should be chosen if this site is to be used.*
- *The EIS states that Darley Road is a contaminated site, likely including asbestos. There is a risk to the community associated with spoil removal, transfer and handling. We object to the selection of the site based on the environmental risks that this creates, along with risks to health of residents.*
- *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 _____

From: [REDACTED] <campaigns@good.do>
Sent: Monday, 16 October 2017 7:40 AM
To: [REDACTED]
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 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.

- 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.

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

- The decision to build a three-stage tollway instead of expanding public transport has never been subjected to democratic decision-making and in fact has been opposed by the great majority of submissions received in response to the Environmental Impact Statements for the first two stages.
- Rozelle Interchange and surrounds will experience increased traffic with associated noise and air pollution— most particularly at the Crescent, Johnson St and Catherine St, Annandale/Lilyfield/Leichhardt and Ross Street, Glebe. These streets are already highly congested at peak times and with a massive number of extra truck movements and traffic associated with construction, these streets will become gridlocked during peak times.
- The EIS 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 construction and operation of the project will result in 51 property acquisitions. We object to the project in its entirety because of this impact. We note that a number of long-standing businesses have been acquired and that many families and businesses in earlier stages have been forced to go to court to seek fair compensation. We object to the acquisition in particular of the Dan Murphys site. The business was substantially renovated and a new business opened with full knowledge of the likely acquisition. We object to it being acquired and compensated in this circumstances and call on the Government to investigate the circumstances which led to this occurring (Executive Summary xvii)
- The RMS has previously identified the Darley Rd site in Leichhardt as the third most dangerous traffic hazard in the Inner West. The NSW Land and Environment Court found that the location of the site couldn't safely deal with 60 bottle truck movements a week, but the M4/M5 EIS shows that more than 800 vehicles including hundreds of heavy ones will use the site each day as part of construction of M4M5 Link. HOW IS THIS POSSIBLE? why are the already acknowledged impacts being ignored.
- 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.
- 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.
- I am concerned that while hundreds of impacts on resident, including noise, loss of business, dust, and lost time through more traffic congestion, are identified in the EIS, the approach is always to recommend approval and promise vague 'mitigation' in the future. This is not good enough.
- The 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.
- The impacts on The Crescent and Annandale are massive and were not sufficiently revealed in the Concept Design to enable residents to give feedback on the negative impacts on communities and businesses in the area.
- I do not consider so many disruptions of pedestrian and cycle ways to be a 'temporary' impact. Four years in the life of a community is a long time. The EIS acknowledges that there will be more danger in the environment around construction sites. It is a serious matter to deliberately take steps to reduce the safety of a community, especially when

as the traffic analysis shows there will be a legacy of traffic congestion even in 2033. A promise of a plan is NOT an answer to those concerned about the impacts.

- The EIS states that after the M4-M5 opens, that traffic on Darley Road will increase by 4%. There is no benefit in the overall project for residents. During construction westbound traffic will increase on Darley Road by 37%. This increase in traffic for a period of up to five years will make it hazardous to cross the road and access the light rail and travel to Blackmore oval, the bat run, the dog park and the Leichhardt pool. In addition, it will drastically increase both local traffic and outer area traffic at peak commute times. We therefore object to the location of this site based on the unacceptable traffic impacts it will have on road users and on residents.

- 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.

- Along with the widening of the Crescent at Annandale the White's Creek bridge is to be rebuilt. This will mean that the road in this area will be reduced in width as first one side of the bridge is rebuilt followed by the other. Added to the additional volume of trucks from the Rozelle Rail Yards, the Crescent Civil site and the Camperdown site this is going to lead to massive congestion on Johnston St and all along the Crescent towards Ross St and make it virtually impossible for residents to exit and return to their local area. It is most likely that the commercial sectors of the Tramsheds development will be badly affected.

- 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.

- One toll road leads to another 3 being proposed. The EIS's for the M4 East and the New M5 argued the case that serious congestion created near interchanges would be solved once the M4/M5 was built. Now it seems this is not the case and more roads will be needed to relieve the congestion – WHERE DOES THIS END? According to the M4/M5 EIS the real benefits will depend on building the Western Harbour Tunnel, the Airport Link and a tollway heading South. None of these projects have been planned, let alone approved but yet are part of addressing the congestion impacts acknowledged for the M4/M5link project. Given this how is it possible to know or address the impacts of the M4/M5 Link, unless this is just yet more justification for yet more roads?

- 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.

- 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.

- 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.

- 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.

- No noise barriers have been proposed. This is unacceptable and appropriate noise barriers should be included in the EIS for consideration. (Executive Summary xvii)

- 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.

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]

_____ 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.

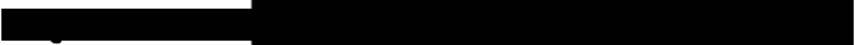
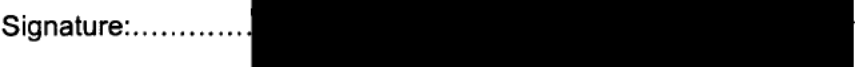


Please reply to [REDACTED]

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Submission from: [REDACTED] and [REDACTED] Signature:..... [REDACTED] Please <u>include / exclude (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. [REDACTED] [REDACTED]	Submission to: Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001 Attn: Director – Transport Assessments Application Number: SSI 7485 Application Application Name: WestConnex M4-M5 Link
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I submit my objection to the WestConnex M4-M5 Link as contained in the EIS application # SSI 7485, for the following reasons, **and ask that the Minister reject the application and require preparation of a genuine, not indicative, EIS**

- The EIS 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)
- 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 EIS states that 'Impacts associated with property acquisition would be managed through a property acquisition support service.' There is no reference as to how this support service will be more effective than that currently offered. There were many upset residents and businesses who did not believe they were treated in a respectful and fair manner in earlier stages. The EIS needs to include details as to lessons learned from earlier projects and how this will be improved for the M4-M5 impacted residents and businesses. (Executive Summary xviii)
- The EIS states that investigation would be undertaken to confirm whether the Victoria Road bridge is a potential roost site for microbats. There will be attempts to 'manage potential impacts' if confirmed. This is inadequate. The project should not be permitted to impact on vulnerable species.
- The EIS acknowledges that visual impacts will occur during construction. However it does not propose to address these negative impacts in the design of the project. This is unacceptable and the EIS needs to propose walls, plant and perimeter treatments and other measures at appropriate locations to lessen the impact on visual amenity. (Executive Summary xviii)
- The EIS does not provide any opportunity to comment on the urban design and landscape component of the project. It states that 'a detailed review and finalisation of the architectural treatment of the project operational infrastructure would be undertaken during detailed design'. The Community should be given an opportunity to comment upon and influence the design and we object to the approval of the EIS on the basis that this detail is not provided, nor is the community (or other stakeholders) given an opportunity to comment or influence the final design.

Submission from:  Signature:.....  <i>Please include /exclude (circle) 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>  	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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- 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.
- The noise mitigation proposed in the EIS is unacceptable. No detail of noise walls is provided, giving residents no opportunity to comment on whether final impacts are acceptable. This is despite the fact 36 homes are identified in the EIS as severely affected by construction noise. The acoustic shed proposed is of the lowest grade and does not cover the entire site, resulting in noise impacts from the movement of trucks in and out of the tunnel access point. The highest grade acoustic shed should be provided, with the shed covering the entire site. The additional noise mitigation such as noise walls, need to be set out in detail so that residents can properly comment on the impacts.
- 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.
- 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 needs to detail the increased risk in crashes that will be caused by the additional 170 vehicles a day that are proposed to enter and leave Darley Road during the construction period.

From: [REDACTED] <campaigns@good.do>
Sent: Monday, 16 October 2017 7:48 AM
To: [REDACTED]
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.

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

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

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

- The Inner West Greenway was considered but not assessed as a cumulative impact. One of the claimed project benefits of the proposal is improved east/west crossings of Parramatta Rd for pedestrians/bikes and the Greenway would achieve this and should be assessed and provided as part of the project. The Greenway was part of inner west LR project before it was deferred in 2011 and Inner West Council has done extensive work on it.

- King Street Gateway is not included in modelling or Cumulative impact assessment however will alter the road geometry and capacity adjacent to the project.

- Acoustic shed – Pyrmont Bridge Road site – Despite setting out the noise impacts of construction at this site, the lowest grade acoustic shed is proposed as mitigation. The EIS states that the Acoustic shed performance should be

‘upgraded’ and the site hoarding increased to 4 metres ‘in select areas.’ (EIS, 10-119). No detail is provided as to how effectively these enhancements will manage the noise and vibration impacts of construction.

- 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).

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

- Why the so called ‘King Street Gateway’ been excluded in the analysis of cumulative impacts of other projects ?

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

- No workers associated with the WestConnex project should be permitted to park on local streets. Parking is at a premium in this area and many residents 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 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.

- 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.

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.

- The original objectives of the project specified improving road and freight access to Sydney Airport and to Port Botany. Neither Stage 2 or 3 provides such access. Both the new M5 and the new M4-M5 Link will dump 1,000s more per day onto the roads to the Airport which are already at capacity.

- The EIS indicates that 36 homes will have unacceptable noise impacts for extended periods at the Darley road construction site. The EIS does not mention the cumulative impact of aircraft noise in the Leichhardt or St Peters area, and therefore does not reflect the true impact of construction noise on the amenity of nearby residents and businesses. The noise impacts of construction are not able to be mitigated to an acceptable level and the EIS should not be approved on this basis.

- It is outrageous to suggest that four unfiltered stacks would be built in one area, Rozelle

- Truck routes – Leichhardt: No trucks should be permitted on Darley Road or local roads in Leichhardt or Lilyfield. The EIS proposes that all trucks will arrive at the Darley Road civil and tunnel site from Haberfield and travel along Darley Road to the site, with a right-hand turn now permitted into James Street. The proposed route will result in a truck every 3-4 minutes for 5 years running directly by the small houses on Darley Road. These homes will not be habitable during the five-year construction period due to the unacceptable noise impacts. The truck noise will be worsened by their need to travel up a steep hill to return to the City West Link, so the noise impacts will affect not just those homes on or immediately adjacent to Darley Road. The proposal to run trucks so close to homes is dangerous and there have been two fatalities on Darley Road at the proposed site location. The EIS does not propose any noise or safety barriers to address this. Despite the unacc

ceptable impact to nearby homes, there is no proposal for noise walls, nor any mitigation to individual homes.

· 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.

· 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

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)

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

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

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

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 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.



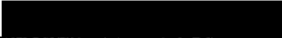
I urge the Secretary of NSW Planning to advise the Minister to reject this EIS, publish, my name and submission in accordance with the undertaking on your website, and provide a written response to each of the objections I have raised.

Yours sincerely, [REDACTED]

_____ 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 To learn more about web protocol FC 3834 visit: www.rfc-base.org/rfc-3834.html

Submission from:  Signature:..... Please <u>include / exclude (circle)</u> my personal information when publishing this submission to your website <u>Declaration</u> : I HAVE NOT made any reportable political donations in the last 2 years.  	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 my objection to the WestConnex M4-M5 Link as contained in the EIS application # SSI 7485, for the following reasons, **and ask that the Minister reject the application and require preparation of a genuine, not indicative, EIS**

- The EIS 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.
- The EIS states that 'temporary diversions along Darley Road may be required during construction' (8-65). No detail is provided as to when these diversions would occur; there is no provision for consultation with the community; no detail as to how long the diversions will be in place and no comment on the impact of diversions on local roads or the amenity of residents. Will diversions occur at night? If so, down what streets? Diverting the arterial traffic from Darley Road down local streets (which are not designed for heavy vehicle volumes) will result in damage to streets, sleep disturbances for residents and create safety issues. There is also childcare centre and a school near the William Street/Elswick Street intersection which will be impacted by diverting vehicles onto local roads. It is unacceptable for proposed road diversions not to be detailed whatsoever in the EIS. The EIS should not be approved without setting out the impacts of road diversions on residents and businesses.
- 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.
- 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 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.

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- 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.
- The EIS acknowledges that visual impacts will occur during construction. However it does not propose to address these negative impacts in the design of the project. This is unacceptable and the EIS needs to propose walls, plant and perimeter treatments and other measures at appropriate locations to lessen the impact on visual amenity. (Executive Summary xviii)
- The EIS states that there will be noise 'exceedances' for trucks entering and exiting the site (Table 5-120) No detail is provided as to the level of any such 'exceedance'. Nor does it propose any mitigation other than investigations into 'locations' where hoarding above 2 metres can be utilized to control trucks in the queuing area. This does not result in any firm plans to manage the noise. Nor is enough detail provided so that those affected can comment on the effectiveness of this proposed mitigation measure.
- The EIS states that 'construction activities are predicted to impact' this School. However, the only mitigation proposed is to consult with the School 'to identify sensitive receivers of the school along with periods of examination'. (Table 5-120) The EIS should not be approved on the basis that it does not propose any measures to reduce the impacts to this School. The EIS simply states that 'where practicable' work should be scheduled to avoid major student examination period when students are studying for examinations such as the Higher School Certificate. This is inadequate and students will be studying every day in preparation for examinations and this proposal will impact on their ability to be provided with an education. Consultation is not considered an adequate response and detailed mitigation should be provided which will reduce the impacts to students to an acceptable level.

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- The EIS does not provide any operational modelling for the Darley Road area (8-11), despite the fact 170 vehicles a day are proposed to enter this highly congested (during peak hours) area. Darley Road is a critical arterial road for commuters accessing the City West Link and this analysis should be provided so that impacts can be properly assessed.
- There is provision in the EIS for only a dozen worker car parks and no provision for the 100 or so workers who will be permanently based at the Darley Road site for up to five years. A major construction site project should not be permitted in a neighbourhood area without allocated parking for all workers. No other business would be permitted to be established without this requirement being satisfied – why is it acceptable for this project? In addition, the EIS proposes the removal of 20 car spaces used by residents on Darley Road and will remove the 'kiss and ride' facility at the light rail stop. This will result in residents being unable to park in their own street and will increase noise impacts from workers doing shift changeovers 24 hours a day.
- The EIS states that 'reasonable and practical management strategies would be investigated to minimize the volume of heavy vehicle movements during peak hours.' (8-53). This is also not acceptable as it is not known what will actually be done to manage this impact. It is not good enough for the EIS, which forms the basis of the approval of this project, to simply mention 'investigations' and not detail a proper plan (on which residents can comment) on management of heavy vehicle movements during peak hours. In addition, Darley Road is very congested from 7am until 9.30am and then from 4pm-6.30pm, well outside the 'peak' periods identified in the EIS. And the impact on traffic will be caused by 'light' vehicles and not simply heavy vehicles. It is clear that there is no plan for managing these vehicle movements. The EIS should not be approved as drafted. It is unacceptable for this volume of vehicles to be proposed for this critical arterial road with no plan for management.
- The EIS acknowledges that these vehicles will use 'dispersed' routes (8-62). In other words, construction vehicles will use and park on local roads. The EIS does not propose any management as to which roads they use. The addition of 70-100 light vehicle movements day in Leichhardt will result in our small, congested streets, which are already at capacity and suffering parking shortages, will have the added impact of workers travelling to and from the site and parking in local streets. There will be rat running. The EIS should provide an agreed route (using arterial roads only) that can be used by all vehicles associated with the project.

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

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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 object to the proposal to the Darley Road civil and tunnel site because of the unacceptable risk it will create to the safety of our community. Darley Road is a known accident and traffic blackspot and the movements of hundreds of trucks a day will create an unacceptable risk of accidents. On Transport for NSW's own figures, the intersection at the City West Link and James Street is the third most dangerous in the inner west.
- The EIS states that spoil haulage hours will be restricted but ignores the fact that the same was promised for the M4 East but these promises have been ignored repeatedly.
- The EIS states that 'reasonable and feasible work practices and mitigation measures would be implemented to minimise potential noise impacts due to activities occurring at the Darley Road civil and tunnel site.' 96-52) This is not good enough. The EIS does not contain any detail whatsoever of these proposal on which they can comment. In addition, there is no requirement that measures will in fact be introduced to address noise impacts. The approval conditions need to contain detail of specific noise mitigation measures that are mandated and can be enforced.
- 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.
- Unacceptable noise levels will accompany the construction of this massive interchange. No analysis has been provided of the magnitude of increased noise pollution which will adversely affect the local citizens.
- The EIS states "Direct and indirect traffic disruptions are likely to be experienced on local and arterial roads in most suburbs that are in close proximity to construction sites. This would include the suburbs of Ashfield, Haberfield, St Peters, Camperdown, Annandale, Lilyfield, Leichhardt, and Rozelle." Despite this finding, the study then pushes these negative impacts aside as inevitable. There is never any evaluation of whether in the light of the negative impacts an alternative public infrastructure project might be preferable

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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.

Submission to:

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

Signature:.....

Attn: Director – Transport Assessments

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Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

- 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.
- 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.
- 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.
- This EIS contains little or no meaningful design and construction detail. It appears to be a wish list not based on actual effects. Everything is indicative, 'would' not 'will', telling me nothing is actually 'known' for certain – and is certainly not included here.
- I am appalled to read in the EIS that more than 100 homes across the Rozelle construction sites will be severely affected by construction noise for months or even years at a time. This would include hundreds of individual residents including young children, school students and people who spend time at home during the day. The predicted levels are more than 75 decibels and high enough to produce damage over an eight hour period. Such noise levels will severely impact on the health, capacity to work and quality of life of residents. NSW Planning should not give approval to a project that could cause such impacts. Promises of potential mitigation are not enough, especially when you consider the ongoing unacceptable noise in Haberfield during the M4East construction.
- 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.

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- *Stage 3 is the most complex and expensive stage of WestConnex, yet there are no detailed construction plans. It is not enough to say there will be mitigation if negative impacts unfold. An EIS should assess risks and be able to predict whether they are worth risking and if so, what mitigation should be necessary.*
- *I do not accept the finding in the Appendix P that there will be no noise exceedences during construction at Campbell Rd St Peters. There has been terrible noise during the early construction of the New M5. Why would this stop, especially given the construction is just as close to houses? Is it because the noise is already so bad that comparatively it will not be that much worse. This casts doubt on the whole noise study.*
- *The EIS claims to have saved Blackmore Park and Easton Park due to negative community feedback. I am concerned that this is a false claim and that this site was never really in contention due to other physical factors. I would like NSW Planning to investigate whether this claim is correct to have heeded the community is false or not.*
- *The EIS acknowledges that visual impacts will occur during construction. However it does not propose to address these negative impacts in the design of the project. This is unacceptable and the EIS needs to propose walls,, plant and perimeter treatments and other measures at appropriate locations to lessen the impact on visual amenity. (Executive Summary xviii)*
- *Motor vehicles account for 14% of Particulate Pollution of 2.5 microns and less in Australia. There is no safe level to exposure to particulate matter of 2.5 microns and less. Particulate matter is linked with Asthma, Lung Disease, Cancer and Stroke.*
- *The Rozelle and Iron Cove interchanges are not to meet the project objective of linking M4 East and New M5 (Part 3.3 of EIS) and should not be included in the Project. Existing motorways (Cross City Tunnel and Eastern Distributor) would provide suitable road capacity to avoid the city centre.*
- *The Western Sydney Airport is due to commence construction next year with completion in 2026. Demand for air travel in Sydney is set to double over the next 20 years. Initial patronage is said to be 10 million passengers per year. Information should be provided demonstrating how (or whether) the project caters for travel to the new airport and the likely lessening of demand to the current monopoly airport.*
- *It all very difficult for the community to access hard copies of the EIS outside normal working and business hours. The Newtown Library only has one copy of the EIS, and has extremely limited opening hours. This restricted access does NOT constitute open and fair community engagement.*

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Application Number: SSI 7485

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- 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 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.
- 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
- 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.
- In Leichhardt serious safety concerns about the choice of the Darley Rd site have been raised by the Inner West Council and an independent engineer's report. Despite countless meetings between local residents and SMC and RMS over 12 months, none of the serious and legitimate concerns raised by the residents have even been acknowledged. This is a massive breach of community trust and seriously questions the integrity of the EIS.
- 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.

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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

Signature:.....

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Submission to:



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

Attn: Director – Transport
Assessments

Application Number: SSI 7485

Application Name:
WestConnex M4-M5 Link

- The EIS states that 'some surface works' would need to be carried out out-of-hours to minimise traffic disruptions or for safety or operational reasons'. Given that Darley Road is a known accident black spot and is highly congested, particularly at peak periods, it is likely that there will be frequent out-of-hours work. This will create an unacceptable impact on those living close to the site. There are an estimated 36 homes that will suffer severe noise impacts and out of hours work will adversely affect their amenity of life. In addition, it is likely to lead to additional road closures and diversions, placing pressure on the local traffic network. No out-of-hours work should be permitted except in the case of a true emergency. The EIS as drafted effectively permits out of hours to be undertaken whenever this is convenient to the contractor (Executive Summary xiv).
- The Hawthorne canal, which is the closest waterway to the Darley Road site, is described in the EIS as a 'sensitive receiving environment'. (Executive Summary, xix). Darley Road is a contaminated site with asbestos and the water treatment plant to be established during construction proposes running water from the treatment plant directly into the waterways. The permanent water treatment plant will involve water from the tunnel discharged to local stormwater systems and waterways, therefore this is a permanent impact. This proposal will further compromise the quality of the waterway and impact on the four rowing clubs in close vicinity.
- The proposal for a permanent water treatment plant and substation to the south of the site on Darley Road will prevent direct pedestrian access to the light rail station. It will affect the future uses of the site once the project is completed. The facility is out of step with the area which is comprised of low rise homes and detracts from the visual amenity of the area. This site is a pedestrian hub and will be a visual blight for pedestrians, bike users and the homes that have direct line of sight to the facility. It should not be permitted on this site.
- The EIS currently permits trucks to access local roads in 'exceptional circumstances', which includes queuing at the site. Given the constraints of the site (and based on experience with cars accessing the site for Dan Murphy's), queuing will be the norm and not the exception. The EIS needs to be amended to rule out queuing as an exceptional circumstance which allows trucks to use local roads.

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Signature:..... 	Attn: Director – Transport Assessments
Please include my personal information when publishing this submission to your website Declaration : I HAVE NOT made any reportable political donations in the last 2 years.	Application Number: SSI 7485 Application
	Application Name: WestConnex M4-M5 Link

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

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

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Assessments

Application Number: SSI 7485

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WestConnex M4-M5 Link

- The EIS acknowledges that four years of M4/M5 construction would have a negative economic and social impact across the Inner West through interrupted traffic routes, slower traffic times, disruption with public transport, interruption with businesses and loss of connections across communities. This finding highlights the need for a proper cost benefit analysis for the project. Such social costs should not simply be dismissed with the promise of a construction plan into which the community has not input or powers to enforce.
- The proposed work hours for the Rozelle Rail Yards are tunnelling and spoil handling 24 hours a day seven days a week. Civil construction Mon - Fri 7.00am – 6.00pm, Sat 8.00am -1.00 pm. There will be no night work at The Crescent Civil Site and the daytime hours are stated to be the same as at the Rozelle Rail Yards. However as has been experienced by those at Haberfield and St Peters these hours and especially late and night work have been extended and implemented when the schedule has fallen behind and this has lead to physical and mental stress for many residents through interrupted sleep and loss of sleep especially with children. The roads and sites at night in the area will see a marked increase in noise from truck movements, truck reversing alarms and running machinery. It will also see a marked increase in light during the night hours with site illumination and vehicle head lights as has been experienced in other areas. These problems have not been properly addressed and are not adequately dealt with in the EIS.
- The Air quality data is confusing and is not presented in a form that the community can interpret. The lack of clarity leads to a suspicion that areas of concern are being covered up.
- 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.
- It is outrageous to suggest that four unfiltered stacks would be built in one area in Rozelle
- The process that has led to this EIS has been undemocratic and obscure, driven by decisions made behind closed doors.

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Application Number: SSI 7485

Application Name:
WestConnex M4-M5 Link

- 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.
- 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.

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[Redacted]

[Redacted]

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- 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.
- 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.
- 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.
- 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 we have fewer parks than almost any suburb in Sydney so this would have a direct impact on local people. Buruwan Park also lies on 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 get 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.

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

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- 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 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.
- 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.
- The EIS states that Darley Road is a contaminated site, likely including asbestos. There is a risk to the community associated with spoil removal, transfer and handling. We object to the selection of the site based on the environmental risks that this creates, along with risks to health of residents.
- The EIS states that after the M4-m5 opens, that traffic on Darley Road will increase by 4%. There is no benefit in the overall project for residents. During construction westbound traffic will increase on Darley Road by 37%. This increase in traffic for a period of up to five years will make it hazardous to cross the road and access the light rail and travel to Blackmore oval, the bat run, the dog park and the Leichhardt pool. In addition, it will drastically increase both local traffic and outer area traffic at peak commute times. We therefore object to the location of this site based on the unacceptable traffic impacts it will have on road users and on pedestrians.

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

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- The Project will have significant impacts on the streets near on- and off-ramps. Modelling shows that the Anzac Bridge will have 60% more traffic in 2033 because of the Project.
- The modelling assuming journey time shifting when mode shifting is more likely.
- The modelling does not consider the latest plans from the NSW Government's Greater Sydney Commission despite them being released nine months ago.
- I object to the whole project because the people of Western Sydney were not consulted about where they wanted new roads or what transport they prefer. The WestConnex project with the tolls we will have to pay was just dumped on us, there was no consultation about our needs.
- The management of water in the Rozelle Yards is of great concern as the site is highly contaminated and the construction work that will be carried out will cause a great deal of disturbance especially once vegetation has been removed. There will be potential impacts from contaminated soils, leakage/spills of hydrocarbons and other chemicals from machinery, vehicles transporting spoil adjacent to roads and stormwaters, rinse water from plant washing and concrete slurries. Water from tunnelling

activity and other works will also introduce contaminants. The EIS says that much of this water will be treated in temporary treatment facilities and sediment tanks before being released to Whites Creek and Rozelle Bay. The EIS does not disclose what levels of pollution controls will be implemented to make sure that contaminated water is not released into White's Creek or Rozelle Bay. This is not acceptable.

- The project directly affected five listed heritage items, including demolition of the stormwater canal at Rozelle. Twenty-one other statutory heritage items of State or local heritage significant would be subject to indirect impacts through vibration, settlement and visual setting. And directly affected nine individual buildings as assessed as being potential local heritage items. It is unacceptable that heritage items are removed or potentially damaged and the approval should prohibit such destruction.(Executive Summary xviii)
- Residents of Haberfield should not be asked to choose between two construction sites. This smacks of manipulation and a deliberate attempt to divide a community. Both choices extend construction impacts for four years and severely impact the quality of life of residents. NSW Planning should reject the impacts on Haberfield as unacceptable. (page 106)

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Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	
Application Number: SSI 7485	
Application Name: WestConnex M4-M5 Link	Signature: 
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I object to the whole of the WestConnex Project, and the specific WestConnex M4-M5 Link proposals as contained in the EIS application, for the following reasons, and request the Minister reject the application.

- The EIS states that 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.
- Rather than ease congestion the project is likely to reduce the availability of funds for projects that enable that genuinely reduce congestion (road pricing), give priority for high productivity road users such as delivery and service vehicles or genuinely avoid congestion (public transport in separate corridors/lanes).
- 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.
- The most highly effected area of Stage 3 will be Rozelle with the massive and complex interchange. Nothing like this has been built anywhere else in the World and it is highly questionable as to whether it can be built at all in the form outlined in the EIS. The EIS does not show any detailed plans as to how this will be achieved. There are no constructional details at all, what is shown is a concept only, this is totally unacceptable.
- There is relatively limited urban redevelopment potential along the small section of Victoria Road that the Project would decongest, and this section is not been classified by the NSW Government as redevelopment area. To claim this as a benefit is misleading.
- 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.

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- *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.*
- *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. 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 unlivable during this period. In addition, the planned 170 heavy and light vehicles will considerably worsen the impact of construction noise.*
- *The EIS does not mention the impact of aircraft noise and its cumulative impact. As such, the noise levels identified are misleading. I object to the selection of the Darley Road site because of the unacceptable noise impacts it will have on surrounding homes and businesses.*

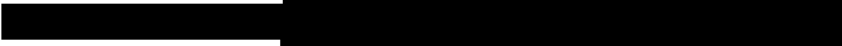


Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 150px; height: 15px;"></div>
Application Number: SSI 7485	<div style="background-color: black; width: 50px; height: 15px; display: inline-block;"></div> <div style="background-color: black; width: 150px; height: 40px; display: inline-block; vertical-align: middle;"></div> <div style="background-color: black; width: 40px; height: 15px; display: inline-block; vertical-align: middle;"></div>
Application Name: WestConnex M4-M5 Link	Signature: <div style="background-color: black; width: 150px; height: 30px; display: inline-block;"></div>
<p style="text-align: center;">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.</p>	

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| <ul style="list-style-type: none"> ➤ The EIS states that the project will improve connection to the Sydney Airport and Port Botany. It will not. The Premier herself has said that the Sydney Gateway does not form part of the WestConnex project. Without the Sydney Gateway, connections between WestConnex (St Peters Interchange) and Sydney Airport and Port Botany will be via congested surface roads in Botany and Mascot. As the connection is unresolved, it is impossible to determine the effect on demand of the unknown pricing regime that will apply to the Sydney Gateway, nor how much travel time will be incurred – which might actually negate the already marginal proposed travel time savings. ➤ It is quite clear to me that insufficient research has been done on the archeology of the Rozelle Railway yards. This could be a valuable archeology site. Why has an EIS been put forward without the necessary research being done to further identify potential remains? No project should be approved on the basis of such an inadequate level of research. ➤ The WestConnex program of works has been described as an integrated transport network solution. However, the role and interdependency with public transport and freight rail is not considered. The recent Government commitment to a Metro West requires a rethink on the need for WestConnex. Particularly as the WestConnex business case outlines a mode shift | <p>from public transport to the toll road as a benefit required to justify it economically.</p> <ul style="list-style-type: none"> ➤ While WestConnex might integrate with the wider motorway network, no evidence is provided demonstrating that it integrates with the wider road network – let alone the broader transport and land use system. For example the EIS provides no information about changes in traffic volumes entering the Sydney CBD caused by WestConnex. RMS has only just commenced work to identify which roads fanning out from WestConnex portals will need to be upgraded to deliver large numbers of vehicles to and from the project. It is therefore possible to form a properly informed understanding of the environmental impacts – the very purpose of the EIS. ➤ Ambient air quality - There is no evidence provided in the EIS that the ventilation outlets will be date. The EIS simply states that 'the ventilation outlets would be designed to effectively disperse the emissions from the tunnel and are predicted to have negligible effect on local air quality (xiv, Executive Summary). This is inadequate and details of the impacts on air quality need to be provided so that the residents and experts can meaningfully comment on the impact. |
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Name _____ Email _____ Mobile _____

Submission from:  Signature:..... <i>Please include /exclude (circle) 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>  	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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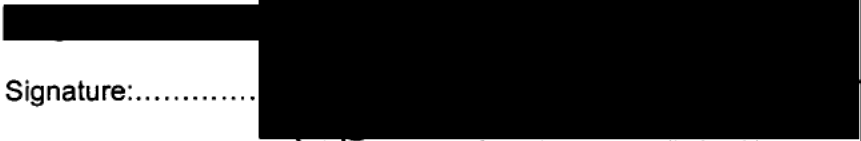


I submit my objection to the WestConnex M4-M5 Link as contained in the EIS application # SSI 7485, for the following reasons, **and ask that the Minister reject the application and require preparation of a genuine, not indicative, EIS**

- The construction and operation of the project will result in 51 property acquisitions. We object to the project in its entirety because of this impact. We note that a number of long-standing businesses have been acquired and that many families and businesses in earlier stages have been forced to go to court to seek fair compensation. We object to the acquisition in particular of the Dan Murphys site. The business was substantially renovated and a new business opened with full knowledge of the likely acquisition. We object to it being acquired and compensated in this circumstances and call on the Government to investigate the circumstances which led to this occurring (Executive Summary xvii)
- No noise barriers have been proposed. This is unacceptable and appropriate noise barriers should be included in the EIS for consideration. (Executive Summary xvii)
- The EIS states that property damage due to ground movement may occur. We object to the project in its entirety on this basis. The EIS states that 'settlement, induced by tunnel excavation, and groundwater drawdown, may occur in some areas along the tunnel alignment'. The risk of ground movement is lessened where tunnelling is more than 35 metres. However, some tunnelling is at less than 10 metres. This proposed tunnel alignment creates an unacceptable risk of ground movement. In addition, the EIS states that there are a number of discrete areas to the north and northwest of the Rozelle Rail Yards, to the north of Campbell Road at St Peters and in the vicinity of Lord Street at Newtown where ground water movement above 20 milliliters is predicted 'strict limits on the degree of settlement permitted would be imposed on the project' and 'damage' would be rectified at no cost to the owner. would be placed (Executive Summary, xvii -iii). The project should not be permitted to be delivered in such a way that there is a known risk to property damage that cannot be mitigated to an acceptable level of risk.
- 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.

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

- The EIS states that 'a preferred noise mitigation option' would be determined during 'detailed design'. This is unacceptable and residents have no opportunity to comment on the detailed designs. The failure to include this detail means that residents have no idea as to what is planned and cannot comment or input into those plans. (Executive Summary xvi)
- The EIS does not provide appropriate parking for the estimated 100 or so workers that the EIS states will work every day at the site, while other equivalent sites have allocated parking for such workers (Northcote Civil site (150)) and Parramatta Road East Civil site (140). It is also noted that the EIS provides for loss of 20 residential parks on Darley Road. Local streets are at capacity already because of the lack of off-street parking for many residents and the Light Rail stop which means that commuters use local streets. The EIS states that workers 'will be encouraged to use public transport.' The reference to The EIS needs to mandate that no trucks or construction vehicles are to park in local streets. There needs to be a requirement that is enforceable that workers use the Light Rail stop which is adjacent to the site or a plan to bus in workers.
- We object to the proposal to the Darley Road civil and tunnel site because of the unacceptable risk it will create to the safety of our community. The traffic forecasts indicate that Darley Road will have 170 heavy and light vehicle movements a day. Darley Road is a known accident and traffic blackspot and the movements of hundreds of trucks a day will create an unacceptable risk of accidents. On Transport for NSW's own figures, the intersection at the City West Link and James Street is the third most dangerous in the inner west. The addition of hundreds of heavy truck movements a day into that intersection will increase the risk of serious accidents for both pedestrians and drivers. The EIS states that the levels of service are expected to Darley Road is directly next to the North Leichhardt Light Rail stop which is a pedestrian hub. Children travelling to school walk to the stop. Active transport users such as bicycle riders will be at risk, along with pedestrians using Canal Road to access the Bay Run, Leichhardt pool and the dog park.
- 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.

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

- I object to the proposal to the Darley Road civil and tunnel site because of the unacceptable risk it will create to the safety of our community. Darley Road is a known accident and traffic blackspot and the movements of hundreds of trucks a day will create an unacceptable risk of accidents. On Transport for NSW's own figures, the intersection at the City West Link and James Street is the third most dangerous in the inner west.
- The EIS permits trucks to access local roads in exceptional circumstances which includes queuing at the site. Given the constraints of the Darley Road site queuing will be the usual situation. The EIS needs to be amended to remove queuing as an exceptional circumstance. The truck movements should properly managed by the contractor so that there is no queuing. This exception will make it easier for contractors to neglect their obligation to monitor and manage truck movements in and out of the site and needs to be removed. The EIS needs to specifically mention all local streets abutting Darley Road and expressly prohibited truck movements (including parking) on these streets. This should include all streets from the north (James St) to the south (Falls Road), which are near the project footprint.
- The Darley Road site should be rejected because it involves acquiring Dan Murphy's. This business was rem=novated and opened with full knowledge that it was to be acquired. The lessee and sub-lessees should not be permitted compensation in these circumstances. The demolition of the entire building (which the EIS confirms will occur) is wasteful and represents mismanagement of public resources.
- No trucks should be permitted on Darley Road or local roads in Leichhardt or Lilyfield. The EIS proposes that all trucks will arrive at the Darley Road civil and tunnel site from Haberfield and travel along Darley Road to the site, with a right-hand turn now permitted into James Street. The proposed route will result in a truck every 3-4 minutes for 5 years running directly by the small houses on Darley Road. These homes will not be habitable during the five-year construction period due to the unacceptable noise impacts. The truck noise will be worsened by their need to travel up a steep hill to return to the City West Link, so the noise impacts will affect not just those homes on or immediately adjacent to Darley Road. The proposal to run trucks so close to homes is dangerous and there have been two fatalities on Darley Road at the proposed site location. The EIS does not propose any noise or safety barriers to address this. Despite the unacceptable impact to nearby homes, there is no proposal for noise walls, nor any mitigation to individual homes.

Submission from:	Submission to:
[REDACTED]	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature:..... [REDACTED]	Attn: Director – Transport Assessments
Please <u>include / exclude (circle)</u> my personal information when publishing this submission to your website Declaration : I HAVE NOT made any reportable political donations in the last 2 years.	Application Number: SSI 7485 Application
[REDACTED]	Application Name: WestConnex M4-M5 Link
[REDACTED]	

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

- The EIS proposes that all trucks will arrive at the Darley Road civil and tunnel site from Haberfield and travel along Darley Road to the site, with a right-hand turn now permitted into James Street. The proposed route will result in a truck every 3-4 minutes for 5 years running directly by the small houses on Darley Road. These homes will not be habitable during the five-year construction period due to the unacceptable noise impacts. The truck noise will be worsened by their need to travel up a steep hill to return to the City West Link, so the noise impacts will affect not just those homes on or immediately adjacent to Darley Road. The proposal to run trucks so close to homes is dangerous. 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 EIS states that there are 'investigations' occurring into alternative access to the Darley Road site. The EIS does not provide any detail on which residents can comment about alternative access which would keep trucks off Darley Road. No spoil truck movements should be permitted on Darley Road and the plans for alternative access should be expedited. It should be a condition of approval that the alternative access is confirmed and that no spoil trucks are permitted to access Darley Road due to the unacceptable noise, safety and traffic issues that the current proposal creates.
- 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 Murphys building has asbestos which creates additional risk during the demolition process.
- 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.

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.

Signature:.....

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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

- 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 overnight 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!
- The removal of spoil from the Rozelle Rail Yards will lead to the largest number of spoil truck movements on the entire Stage 3 project: 517 Heavy truck movements a day, of which 46 are stated to take place during peak hours. This will lead to extra noise and air pollution in this area.
- Volumes on the main links (the trunks) cannot be as high as what is claimed in the EIS. It is physically untenable.
- 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 commuters out west really need is an extension of the heavy rail train system. I object that we were never given a choice about it.
- 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

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<div style="background-color: black; width: 100px; height: 20px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100px; height: 20px; margin-bottom: 5px;"></div> Signature:.....	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
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I submit my objection to the WestConnex M4-M5 Link as contained in the EIS application # SSI 7485, for the following reasons, **and ask that the Minister reject the application and require preparation of a genuine, not indicative, EIS**

- The EIS states that 'settlement, induced by tunnel excavation, and groundwater drawdown, may occur in some areas along the tunnel alignment). The risk of ground movement is lessened where tunnelling is more than 35 metres. However, it is proposed to tunnel at 29 metres under Hawthorne Parade Haberfield and only 35 metres at Elswick Street North. This proposed tunnel alignment creates an unacceptable risk of ground movement. (Executive Summary, xvii). The EIS states that damage will be rectified at no cost to residents with no detail as to how this will occur or the likely extent of property damage. The project should not be approved on the basis that it creates a risk of property damage that cannot be mitigated against so as to bring the risk to an acceptable level.
- The Hawthorne canal, which is the closest waterway to the Darley Road site, is described in the EIS as a 'sensitive receiving environment'. (Executive Summary, xix). Darley Road is a contaminated site with asbestos and the water treatment plant to be established during construction proposes running water from the treatment plant directly into the waterways. The permanent water treatment plant will involve water from the tunnel discharged to local stormwater systems and waterways, therefore this is a permanent impact. This proposal will further compromise the quality of the waterway and impact on the four rowing clubs in close vicinity.
- The EIS states that there may be impacts from flooding which, amongst other things, may disrupt drainage systems. There is no detail as to how the issues with flooding at Darley Road will be managed and on their potential impact on the area. (Executive Summary, xxi)
- The EIS states that all vegetation will be removed on the site which includes a mature tree. I object to the removal of the tree which creates a visual and noise barrier for residents from the City West Link. If the tree is removed it must be replaced with a mature tree as soon as the remediation of the site commences.
- The proposal for a permanent water treatment plant and substation to the south of the site on Darley Road will prevent direct pedestrian access to the light rail station. It will affect the future uses of the site once the project is completed. The facility is out of step with the area which is comprised of low rise homes and detracts from the visual amenity of the area. This site is a pedestrian hub and will be a visual blight for pedestrians, bike users and the homes that have direct line of sight to the facility. It should not be permitted on this site.

Submission from:

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

Signature:.....

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

- *The EIS states that there are 'investigations' occurring into alternative access to the Darley Road site. The EIS does not provide any detail on which residents can comment about alternative access which would keep trucks off Darley Road. The plans for alternative access should be expedited. It should be a condition of approval that the alternative access is confirmed and that no spoil trucks are permitted to access Darley Road due to the unacceptable noise, safety and traffic issues that the current proposal creates.*
- *The mature trees on the Darley Road site should be preserved. If any trees are removed during construction it should be a condition of approval that they are replaced with mature trees.*
- *I object to the location of this facility in our neighbourhood as out of step with the surroundings. If it is retained, then it should be moved to the north of the site, out of view from homes. The residual land should be returned for community purposes such as parkland.*
- *There is no need for the Darley Road site, other than a time saving (tunneling) of several months. It is unacceptable that the community should be forced to endure 5 years of severe disruption to accommodate the timetable of the private contractors. The EIS should not be approved on the basis that it contains provision for the Darley Road site without any proper justification as for its need.*
- *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.*
- *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 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.*

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

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

Signature:.....

Attn: Director – Transport
Assessments

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Application Number: SSI 7485

Application Name:
WestConnex M4-M5 Link

- 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. The EIS should not be approved without details of the proposed mitigation and/or compensation to be paid to residents.
- 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.
- 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.
- Up to 14 'receivers' at this site are predicted to have impacts from high noise impacts during out of hours work for construction and pavement works for approximately 2 weeks caused by the use of a rock-breaker. Again, no plans to relocate or compensate residents affected is provided in the EIS (EIS, XV) The only mitigation contained in the EIS is that the use of the road profiler is to be limited during out of hours works 'where feasible.' (Table 5-120) In other words, there is no mitigation whatsoever for residents affected by daytime noise and a possibility that they will be similarly affected out of hours where the contractor considers that it isn't possible to limit the use of the road profiler. This represents an inadequate response to managing these severe noise impacts for residents.
- The EIS states that there will be noise 'exceedances' for trucks entering and exiting the site (Table 5-120) No detail is provided as to the level of any such 'exceedance'. Nor does it propose any mitigation other than investigations into 'locations' where hoarding above 2 metres can be utilized to control trucks in the queuing area. This does not result in any firm plans to manage the noise. Nor is enough detail provided so that those affected can comment on the effectiveness of this proposed mitigation measure.


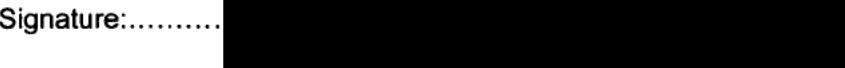


Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001			
Application Number: SSI 7485			
Application Name: WestConnex M4-M5 Link	Signature:		
<p>Please include my personal information when publishing this submission to your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

- ◇ Public transport is rejected by the EIS so the state government is forcing us to use cars more when most major cities in the world are trying to reduce the number of cars on the roads. We know this is to promote private road operators' profits. I object to putting so much public funding to the cause of private profit. I urge the Secretary of Planning to reject this project.
- ◇ The traffic modelling process is not fit for purpose and places significant risks on the people of NSW in terms of:
 - Traffic impacts that are significantly different to those presented in the EIS.
 - Toll earnings that are significantly lower than projections – resulting in government subsidising the owner for lost earnings.
- ◇ 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.
- ◇ The great number of heritage houses in the Rozelle interchange construction zone has not been specifically addressed. Noise and vibration impacts can have far more significant impacts on these types of properties. There is no functional management plan for these risks, no articulated complaints investigation process nor any articulated compensation and remediation strategy.
- ◇ This is despite the RMS being the client for the Sydney Motorways Corporation. It would appear this is a deliberate strategy of the NSW Government to ensure local communities affected by construction traffic have no reasonable means of managing any complaint. It is undemocratic, against the principles of open government espoused in the election platform of the current government and ultimately escalates community unrest.(P 8-44)
- ◇ The EIS states that 'a preferred noise mitigation option' would be determined during 'detailed design'. This is unacceptable and residents have no opportunity to comment on the detailed designs. The failure to include this detail means that residents have no idea as to what is planned and cannot comment or input into those plans. (Executive Summary xvi)
- ◇ 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 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.

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

- I 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.

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

Submission to:

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

Signature:.....




Attn: Director – Transport
Assessments

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Application Number: SSI 7485

Application Name:
WestConnex M4-M5 Link

- The EIS states that an alternative truck movement is proposed which involves use of the City West Link and no need for spoil trucks to access darley Road. This proposal is supported, subject to further information about potential impacts being provided. The EIS should not be approved on its current basis which provides for 170 heavy and light vehicles accessing darley Road on a daily basis. This will create unacceptable safety issues and noise impacts for adjacent homes while also compromising pedestrian and bicycle access to the light rail and bay run. It will also lead to truck chaos on this critical arterial road providing access to and across the City west Link. The current proposal which provides for truck movements solely on Darley Road should not be approved and approval should only be given to the alternative proposal. I repeat however my objection to the selection of this site altogether, but propose the least worst impact should be chosen if this site is to be used.
- No workers associated with the WestConnex project should be permitted to park on local streets. Parking is at a premium in this area and many residents 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 pre-DA application for 120 units on William Street which is not taken into account in the EIS. This will place further stress on parking. The EIS needs to outright prohibit any worker parking on local streets.
- The 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.
- 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. 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 unlivable during this period. In addition, the planned 170 heavy and light vehicles will considerably worsen the impact of construction noise.

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	Application Name: WestConnex M4-M5 Link
	

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

- The EIS should not be approved as it does not contain any certainty for residents as to what is proposed and does not provide a basis on which the project can be approved. This is because the EIS states 'the detail of the design and construction approach is indicative only' and is subject to 'detailed design and construction planning to be undertaken by the successful contractors.'
- The EIS does not provide any opportunity to comment on the urban design and landscape component of the project. It states that 'a detailed review and finalisation of the architectural treatment of the project operational infrastructure would be undertaken during detailed design'. The Community should be given an opportunity to comment upon and influence the design and we object to the approval of the EIS on the basis that this detail is not provided, nor is the community (or other stakeholders) given an opportunity to comment or influence the final design.
- 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.
- The EIS indicates that residents will be subjected to severe noise impacts for up to 4 months, caused by the long-term construction work proposed for this site which includes 8 weeks to demolish buildings, followed by 6 weeks to establish construction facilities, with pavement and infrastructure works required (EIS, 10-112) The EIS contains limited mitigation proposed to manage such impacts.
- Despite setting out the noise impacts of construction at this site, the lowest grade acoustic shed is proposed as mitigation. The EIS states that the Acoustic shed performance should be 'upgraded' and the site hoarding increased to 4 metres 'in select areas.' (EIS, 10-119). No detail is provided as to how effectively these enhancements will manage the noise and vibration impacts of construction.
- Up to 14 'receivers' at this site are predicted to have impacts from high noise impacts during out of hours work for construction and pavement works for approximately 2 weeks caused by the use of a rock-breaker. Again, no plans to relocate or compensate residents affected is provided in the EIS (EIS, XV) The only mitigation contained in the EIS is that the use of the road profiler is to be limited during out of hours works 'where feasible.' (Table 5-120) In other words, there is no mitigation whatsoever for residents affected by daytime noise and a possibility that they will be similarly affected out of hours where the contractor considers that it isn't possible to limit the use of the road profiler. This represents an inadequate response to managing these severe noise impacts for residents.

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

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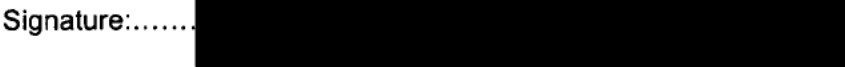


Application Number: SSI 7485

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 site of the facility if it is moved. This will also enable direct pedestrian access to the light rail without the need to use the winding path at the rear of the site which creates safety issues and adds to the time required to access the light rail stop.
- 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 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.

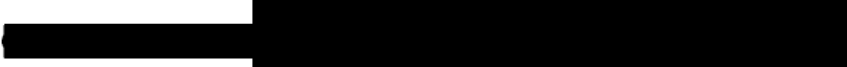
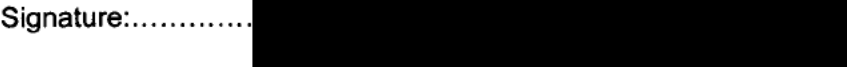


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I submit my objection to the WestConnex M4-M5 Link as contained in the EIS application # SSI 7485, for the following reasons, **and ask that the Minister reject the application and require preparation of a genuine, not indicative, EIS**

- *The 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.*
- *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 an increase in the green space for residents and result in a pleasant green environment for pedestrians, rather than a fenced facility.*
- *The EIS currently permits trucks to access local roads in 'exceptional circumstances', which includes queuing at the site. Given the constraints of the site (and based on experience with cars accessing the site for Dan Murphy's), queuing will be the norm and not the exception. The EIS needs to be amended to rule out queuing as an exceptional circumstance which allows trucks to use local roads.*
- *All of the streets abutting Darley Road identified as NCA 13 (James Street to Falls Street) should have a blanket 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. These streets are not constructed for heavy vehicle movements and on this basis should also be ruled out. The EIS needs to prohibit outright truck movements including parking) and worker parking on all of these streets.*
- *The EIS needs to require that all workers are bussed in or use public transport such as the light rail with no parking whatsoever permitted on local roads at the Darley Road site. This is justified because the site provides 11 car spaces for an estimated 100 workers a day on site. The project cannot be approved on this basis without a strict requirement on workers to use public transport or project provided transport and a prohibition needs to be in place against parking on local streets. The EIS needs to require that this restriction is included in all contracts and in the relevant approval documentation.*

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

- The EIS states that a Construction traffic and Access Management plan (CTAMP) would be prepared to minimise delays and disruptions and identify changes to ensure road safety. The plans are not in the EIS so residents cannot comment. The EIS should be rejected on the basis that the impacts on traffic and safety are not adequately addressed. It is inadequate to simply refer to a plan, with no provision for residents and other key stakeholders to be involved in its development.
- The EIS provides that Darley Road traffic will increase by 4% following the completion of the project in 2022. There is no benefit for residents flowing from this project. It is unacceptable that Leichhardt residents, particularly those close to Darley Road, will be forced to endure years of highly intrusive construction impacts and then derive no benefit from the project. The EIS states that the road network will improve once the Western Harbour Tunnel and Beaches Link opens, which means that residents will have to endure worsened traffic conditions for up to 10 years. While the traffic on the City West Link is forecast to decrease by up to 40 per cent once the project is completed, this is based on commuters electing to use the tollways. There is limited evidence to support these statistics and it is likely that many people will choose to use local roads to avoid the toll which will result in significant rat-running. There is no plan in the EIS to manage this issue.
- The EIS states that 'some surface works' would need to be carried out out-of-hours to minimise traffic disruptions or for safety or operational reasons'. Given that Darley Road is a known accident black spot and is highly congested, particularly at peak periods, it is likely that there will be frequent out-of-hours work. This will create an unacceptable impact on those living close to the site. There are an estimated 36 homes that will suffer severe noise impacts and out of hours work will adversely affect their amenity of life. In addition, it is likely to lead to additional road closures and diversions, placing pressure on the local traffic network. No out-of-hours work should be permitted except in the case of a true emergency. The EIS as drafted effectively permits out of hours to be undertaken whenever this is convenient to the contractor (Executive Summary xiv).
- The EIS states that construction noise levels would exceed the relevant goals without additional mitigation. Activities identified include earthworks, demolition of existing structures and site establishment and utility adjustments. The Darley Road site will suffer unacceptable construction impacts due to the need to demolish the large Dan Murphy's building and the EIS notes that 10 weeks of demolition and road adjustment works will be needed. There are no additional mitigation measures proposed for residents during this period such as temporary relocation, noise walls or treatments for individual homes. 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. (Executive Summary, xiv) We object to the selection of this site on the basis that the works required (demolition and surface works) will create unbearable noise and vibration impacts and make over 30 homes unlivable and there are NO additional mitigation plans for these residents.

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:

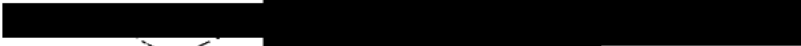


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I object to the WestConnex M4-M5 Link proposals for the following reasons, and request the Minister reject the application, and require SMC and RMC to prepare a new EIS that is based on genuine, not indicative, design parameters, costings, and business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

- There is no evidence provided in the EIS that the ventilation outlets will be date. The EIS simply states that 'the ventilation outlets would be designed to effectively disperse the emissions from the tunnel and are predicted to have negligible effect on local air quality (xiv, Executive Summary). This is inadequate and details of the impacts on air quality need to be provided so that the residents and experts can meaningfully comment on the impact.
- Rozelle Interchange and surrounds will experience increased traffic with associated noise and air pollution- most particularly at the Crescent, Johnson St and Catherine St, Annandale/Lilyfield/Leichhardt and Ross Street, Glebe. These streets are already highly congested at peak times and with a massive number of extra truck movements and traffic associated with construction, these streets will become gridlocked during peak times
- The EIS does not mention the impact of aircraft noise and its cumulative impact. As such, the noise levels identified are misleading. I object to the selection of the Darley Road site because of the unacceptable noise impacts it will have on surrounding homes and businesses.
- This EIS provides no basis on which to approve such a complex project including the building of interchanges underneath Sydney suburbs Rozelle and Leichhardt. It would be absurd to approve the building of up to three tunnels under people's homes on the basis of such flimsy information
- The impact of the deep tunnelling for the M4-M5 link - in addition to the tunnelling for the new Sydney Metro in the same area - in the Tempe, Sydenham, St Peters, Newtown and Camperdown and beyond is an unknown hazard to the soundness of the buildings above, and given that two different tunnelling operations will take place quite close, the people in those buildings will struggle to get repairs and compensation for loss because either contractor will no doubt blame the other. The increasing numbers of vehicles will also increase the vehicle pollution (known to have adverse effects on breathing and also to be carcinogenic) in this area.
- The EIS refers to be construction impacts as being 'temporary'. I do not consider a five year construction period to be temporary.

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

- The EIS states that 'reasonable and feasible work practices and mitigation measures would be implemented to minimise potential noise impacts due to activities occurring at the Darley Road civil and tunnel site.' 96-52) This is not good enough. The EIS does not contain any detail whatsoever of these proposal on which they can comment. In addition, there is no requirement that measures will in fact be introduced to address noise impacts. The approval conditions need to contain detail of specific noise mitigation measures that are mandated and can be enforced.
- The EIS does not require an acoustic shed and states that 'Acoustic barriers and devices at the access tunnel entrances would be considered and implemented where reasonable and feasible to minimise potential noise impacts associated with out-of-hours works within the tunnels.' (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 Darley Road site will not be returned after the project, with a substantial portion permanently housing a Motorways Operations facility which involves a substation and water treatment plant. This means that the residents will not be able to directly access the North Light rail Station from Darley Road but will have to traverse Canal Road and use the narrow path from the side. In addition the presence of this facility reduces the utility of this vital land which could be turned into a community facility. Over the past 12 months community representatives were repeatedly told that the land would be returned and this has not occurred. We also object to the location of this type of infrastructure in a neighbourhood setting.

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

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

- The EIS 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.
- 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.
- The EIS states that there are 'investigations' occurring into alternative access to the Darley Road site. The EIS does not provide any detail on which residents can comment about alternative access which would keep trucks off Darley Road. No spoil truck movements should be permitted on Darley Road and the plans for alternative access should be expedited. It should be a condition of approval that the alternative access is confirmed and that no spoil trucks are permitted to access Darley Road due to the unacceptable noise, safety and traffic issues that the current proposal creates.
- Removal of vegetation – Leichhardt. The EIS states that all vegetation will be removed on the Darley Road site. There are several mature trees located on the north of the site. None of these trees should be removed as they provide precious greenery. They also act as a visual and noise screen for residents from the City West Link traffic. All efforts should be taken to retain the trees and the EIS should not simply permit these trees to be removed without proper investigations being undertaken as to how they can be retained. If they are removed following a proper investigation and consideration of all options, then the approval needs to specify that all streets are replaced with mature, native trees at the conclusion of the construction at the site.

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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 am concerned that the AECOM, the company responsible for the EIS, always approves knocking down heritage buildings if the project requires it. It doesn't how much value it holds for the community, it must always be destroyed.
- The impacts on The Crescent and Annandale are massive and were not sufficiently revealed in the Concept Design to enable residents to give feedback on the negative impacts on communities and businesses in the area.
- 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.
- 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."
- 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.
- 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.

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

- The EIS identifies hundreds of risks at different construction sites. In relation to these risks the EIS recommends proceeding despite the risks; or seeking a way to mitigate risks during the "detailed design" phase. That phase excludes the public altogether. That is, the M4/M5 should be approved with no calculation of risks or what mitigation may mean for impacted residents.
- I am concerned that the AECOM, the company responsible for the EIS, always approves knocking down heritage buildings if the project requires it. It doesn't how much value it holds for the community, it must always be destroyed.
- The proposal for a permanent water treatment plant and substation to the south of the site on Darley Road will prevent direct pedestrian access to the light rail station. It will affect the future uses of the site once the project is completed. The facility is out of step with the area which is comprised of low rise homes and detracts from the visual amenity of the area. This site is a pedestrian hub and will be a visual blight for pedestrians, bike users and the homes that have direct line of sight to the facility. It should not be permitted on this site.
- Table 6.1 in Appendix Q (Social and Economic impact) is not an accurate report on the concerns of residents. It downplays concerns of Newtown, St Peters and Haberfield residents. It does not even mention concerns about additional years of construction in Haberfield and St Peters. It raises the question of whether this is a result of the failure of SMC to notify impacted residents including those on the Eastern Side of King Street and St Peters about the potential impacts of the M4 M5
- Many homes around the Rozelle Rail Yards and the Crescent Civil site will be noise affected, some will be highly noise affected. The expected duration of the cumulative works is 120 weeks, almost 3 years, when noise impact will be significant so it is essential that maximum noise mitigation measures are put in place. However the EIS contains only vague details of how mitigation will be carried out. There is no requirement that measures will in fact be carried out to address noise impacts. The approval conditions need to contain specific noise mitigation measures, that can be mandated and enforced. Areas that will be particularly highly noise affected are Bayview Crescent and Railway Parade, the Northern end of Rail Yard site and sections of Lilyfield Rd, Hornsey St, Quirk St and Robert St. Given their proximity, receivers located along Lilyfield Rd between Victoria Road and Gordon St which overlook the Rozelle Yards are likely to experience the greatest construction noise impact within the whole Rozelle area.

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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.

Submission to:

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

Signature:.....

Attn: Director – Transport Assessments

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Application Number: SSI 7485

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- The Rozelle interchange has an unprecedented concentration of stacks, in a valley, adjacent to densely populated suburbs. The interchange has steep and long climbs, increasing emissions concentrations, which will then be pumped into the surrounding area. The modelling does not account for stop-start conditions. However, the EIS shows significant traffic volumes heading onto the Anzac Bridge, which already operates at the lowest Level of Service (F) in peak times. There will be significant queues heading into the tunnels, greatly increasing the level of emissions. The existing M5 in peak conditions may provide a more realistic base line.
- The EIS states that the impact on regional air quality is minimal and thus concludes that the project's impact on ozone is negligible. Ozone is a major pollutant and Western Sydney, Campbelltown in particular, suffers the worst ozone pollution. Major components of ozone are generated in eastern Sydney and drift west. Previous environment departments have spoken about the need for an eight-hour standard concentration and goal for ozone (DECCEW, 2010, State of Knowledge: Ozone). OEH needs to provide information about the value of this standard and on the impact of new motorways on that level.
- In view of the above no tunnelling less than 35m in depth from the surface to the crown of a tunnel (ie the top) under residences should be contemplated let alone undertaken. And of course no tunnelling should be undertaken under sensitive sites.
- The EIS (App H, p.269) refers to the RMS plans to carry out "network integration" works surrounding the Rozelle interchange once the project is complete but offers little detail of the nature of the works. It mentions the intersection of the Western Distributor and Pyrmont Bridge Road at Pyrmont, Western Distributor near Darling Harbour and a review of kerbside uses near Western Distributor, The Crescent, Johnston Street and Ross Street.
- The analysis shows Anzac Bridge/Western Distributor is currently at or close to capacity, particularly in the AM peak where existing operational and geometric features of the road network limit the capacity. The EIS notes that under all scenarios the Project will generate significant additional traffic on these links, requiring major and costly additional motorway infrastructure to the CBD. This is despite the fact that the NSW Government recognises that there is no capacity to accommodate additional car trips to the CBD and all its policies aim to allocate more street space to public transport, walking and cycling. The EIS must assess and identify any upgrades that the Project will cause or require. (App H p. xxxiii)

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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

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Assessments

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

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✚ 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.

✚ One toll road leads to another 3 being proposed. The EIS's for the M4 East and the New M5 argued the case that serious congestion created near interchanges would be solved once the M4/M5 was built. Now it seems this is not the case and more roads will be needed to relieve the congestion – WHERE DOES THIS END? According to the M4/M5 EIS the real benefits will depend on building the Western Harbour Tunnel, the Airport Link and a tollway heading South. None of these projects have been planned, let alone approved but yet are part of addressing the congestion impacts acknowledged for the M4/M5link project. Given this how is it possible to know or address the impacts of the M4/M5 Link, unless this is just yet more justification for yet more roads?

✚ The EIS states that by 2033 Ross St will see an increase of 80 heavy vehicles a day at Peak periods. The greatest increase of Heavy vehicles at the PM peak will be in Johnston Street, which will see an increase of about 30-50 vehicles when compared to the

'without project' scenario. At Catherine St there will be an increase of 30 heavy vehicles a day at Peak periods. These streets will see a huge increase in Heavy vehicle movements if Stage 3 is built. The increase would be roughly half this amount if the project did not go ahead. Annexure Fig 26 B2 Section H

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

✚ 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.

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

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- The decision to build a three-stage tollway instead of expanding public transport has never been subjected to democratic decision-making and in fact has been opposed by the great majority of submissions received in response to the Environmental Impact Statements for the first two stages.
- I do not 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.
- No noise barriers have been proposed. This is unacceptable and appropriate noise barriers should be included in the EIS for consideration. (Executive Summary xvii)
- Alternative access route for trucks – Leichhardt: The EIS states that there are 'investigations' occurring into alternative access to the Darley Road site. The EIS does not provide any detail on which residents can comment about alternative access which would keep trucks off Darley Road. The plans for alternative access should be expedited. It should be a condition of approval that the alternative access is confirmed and that no spoil trucks are permitted to access Darley Road due to the unacceptable noise, safety and traffic issues that the current proposal creates
- We object to the selection of the Darley Road site on the basis that it provides for daily movements of 170 heavy and light vehicles accessing Darley Road. This creates an unacceptable risk to the safety of pedestrians accessing the North Leichhardt light rail stop as well as bicycle users accessing the bicycle route on Darley Road and entering Canal road to join the dedicated bike paths on the bay run. Many school children cross at this point to walk to Orange Grove and Leichhardt Secondary College. The EIS states that an alternative truck movement is proposed which involves use of the City West Link with no trucks to access Darley Road. The selection of Darley Road should not be approved if it involves any truck movements on Darley Road, which is what it currently provides.
- The original objectives of the project specified improving road and freight access to Sydney Airport and to Port Botany. Neither Stage 2 or 3 provides such access. Both the new M5 and the new M4-M5 Link will dump 1,000s more per day onto the roads to the Airport which are already at capacity.

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- There will be 517 Heavy truck movements a day, of which 46 are stated to take place during peak hours from the Rozelle Rail Yard the largest amount of spoil truck movement on the whole of Stage 3. This will lead to a vast amount of extra noise and air pollution in this area. There will also be disturbance of soil in the old Rozelle Goods Yard which will be heavily contaminated with toxic substances. It is highly probable that there will be lead and asbestos. (as was the case in St Peters) You made no provision for the safe removal of these toxic substances in St Peters and the EIS makes no provision for their safe removal in this area.
- The EIS misrepresents the structure of the Global Economic Corridor and overstates the relationship of the project to centres within it by claiming the Project serves centres in the north of the GEC that it does not.
- I note that in the area of Lilyfield Rd and Gordon Street, the work proposed which would include deep excavation that would result in major adverse impacts on archaeological remains, while other surface works would have localised impacts on archaeological remains that may be present. It is suggested that what are called 'management measures' would be carried out including the development of a Historical Archaeological Research Design which would include an "assessment of any detailed design plans to develop a methodology and scope for a program of test excavation to determine the nature, condition and extent of potential archaeological remains." This is completely unacceptable to me. The community will have no right to any input into this plan or access to independent expert advice. This is all part of an 'approve now', 'research later' approach that will lead to poorly planned unnecessary destruction, a loss of potential community history and understanding.
- The cited 'key customers' that would benefit from the project (long distance, freight, businesses) represent a very small minority of those who are forecast to actually use the project (single occupancy commuter vehicles). The key customers could be served by a far more modest project, given they represent an extremely small proportion of projected traffic on the Project.
- The EIS (Section 3.2) does not set out the specific transport needs addressed by the project but states additional road capacity is required to meet a projected increase in trips. It does not set out any trips, desire lines, demand corridors or growth that the WestConnex project is addressing. As a result it is not possible to assess the project's ability to meet those needs. Nor is it demonstrated that projections in growth in population and employment correlate to traffic demand increase along the proposed M4-M5 Link.

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- 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.
- 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.
- The basic question that the people of NSW need answered by the EIS is For the same or lower cost of the project, could we do something that is different to the project that will deliver outcomes that are as good or better? The Secretary's Environmental Assessment Requirements (SEARS) require analysis of feasible alternatives to the project. No feasible alternatives have been developed and no objective analysis of alternatives has been undertaken. While Section 4.4 of the EIS purports to cover Strategic Alternatives, it does little more than offer a discussion of why an alternative was not pursued.
- There is no reliable evidence presented (or available) that building motorways reduces traffic congestion over the long term. No major urban arterial road project, without carefully considered and implemented pricing signals, has succeeded in easing congestion for more than a few years. This is universally acknowledged in planning disciplines, and is replicated by the Future Transport website, has been stated by the current Minister for Transport and the current Premier (during her time as Shadow Minister for Transport).
- 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.

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- It is clear that Annandale, Glebe, Rozelle and Lilyfield will be exposed to unacceptable health risks. With four unfiltered emissions stacks in the area plus a large number of exit portals, the residents of this area will suffer greatly from poisonous diesel particulates. This is negligent when you consider that, the World Health Organisation in 2012 declared diesel particulates carcinogenic. "As you are no doubt aware there are at least 5 schools that will be in the orbit of these poisonous fumes and children and the elderly are most at risk to lung ailments. Your Education Minister Rob Stokes declared in 2017, "No ventilation shafts will be built near any school."
- Where is the commitment to community consultation and to long term planning when the EIS for the M4/M5 Link is released before any response to the extensive community feedback on the M4-M5 Link concept design could possibly have been seriously considered. This demonstrates deep government contempt for the people of NSW and the communities of the Inner West of Sydney in particular.
- No workers associated with the WestConnex project should be permitted to park on local streets. Parking is at a premium in this area and many residents 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 pre-DA application for 120 units on William Street which is not taken into account in the EIS. This will place further stress on parking. The EIS needs to outright prohibit any worker parking on local streets.
- The impact of the project on cycling and walking will be considerable around construction sites. The promise of a construction plan is not sufficient. There has not been sufficient consultation or warning given to those directly affected or interested organisations. There needs to be a longer period of consultation so that the community can be informed about the added dangers and inconvenience, especially when you consider that it is over a 4 year period.
- In the EIS there are indications of what is to be expected in the Rozelle Rail Yards construction site and the Crescent Civil site. But the EIS states that only after Construction Contractors have been engaged would project designs and methodologies be finally worked out and agreed. This may result in major changes to the project design and construction methodologies. The community will have no input into this process, so the community is totally powerless to be able to comment on what will actually be proposed, how it will be carried out and what will finally be built. This is not acceptable.

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- 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.

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- The Project focuses on 'catering for traffic growth' (P4.15). This contradicts and undermines the NSW Government's Long Term Transport Master Plan and Future Transport web site which commit to an integrated approach to congestion management focussed on land use planning, demand management, public transport investment and "a coherent whole of network planning strategy", essentially aiming for growth in public transport and containing road demand to that required to serve the freight and servicing tasks.
- The NSW Government appears to have accepted the project as part of a State Infrastructure Strategy and other plans before a business case was even developed. There was no incentive to explore alternatives or to fully explore the costs and benefits. This process has been described as "lock in". Commitment escalates because a project appears in numerous policy documents. WestConnex is a clear example of government "locking in" commitment before detailed analysis had been undertaken. With the Government fully locked-in to WestConnex, these issues and inadequacies with the Updated Business Case are repeated in the EIS.
- The WestConnex route has changed significantly over time, even after the initial August 2013 Business Case was approved by the NSW Government but not made public. Therefore an Updated Business Case on an updated concept was published in 2015. SGS Economics and Planning undertook a detailed assessment of this and reached the following conclusions:
 - Misrepresentation of the Benefit Cost Ratio (BCR) as 1.71 when it was 1.64.
 - The Business Case did not identify Stage 3 WestConnex, connecting the M4 to the M5, as a priority for "filling in the missing links in Sydney's motorway network".
 - Modelling for post-2031 conditions was not undertaken, however benefits were assumed to continue until 2052.
 - The transport modelling is likely to have underestimated the impact of extra traffic induced by the additional capacity, which would significantly reduce the BCR.
 - The Business Case did not reflect global approaches to congestion management, such as transit investment and demand management.
 - The Business Case suggested WestConnex would help renew Parramatta Road by reducing traffic on it, despite the modelling showing that many parts of it would carry more traffic, not less.
 - Travel time savings are a key component of the positive BCR. A significant proportion of these supposed benefits arise from travel time savings were within the margin of error of modelling, or would be so small that motorists may not notice them (and therefore would not value them).

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- Insufficient justification was provided for the significant travel time savings, and economic benefits, factored into the BCR for business and light commercial vehicles – for instance there was insufficient analysis of origins and destinations of these trips.
- The construction costs appear too conservative – if these increase, the BCR would reduce accordingly.
- Other costs were not accounted for, such as reduced amenity on urban development, loss of land for higher value activities, and the health costs of potentially reduced public transport use.
- In summary, SGS suggested that the actual BCR of the project could be less than 1:1, with NSW taxpayers exposed to the risk that the project may not succeed.
- SMC have made it extremely difficult for the community to access hard copies of the EIS. The local Glebe library only has one copy and this is the situation at other local libraries. There are very limited hours of access to these locations outside normal working hours. Access to the EIS is very difficult without access to a personal computer. This totally restricts open community engagement.
- The project fails to address its most fundamental objective of connecting to Port Botany, the genesis of the entire enterprise
- Crucially, to make the sale more attractive, the tunnels between Haberfield and St Peters will be built independently of the Rozelle Interchange. This is being done to de-risk the project for the private sector sale, as the tunnels can be built using known standards and technology and generate income from January 2023. It would appear that the building of the Rozelle Interchange is so risky that no contractor tendered for the contract in the original tender period.
- Noise impacts – Pyrmont Bridge Road site – The EIS indicates that residents will be subjected to severe noise impacts for up to 4 months, caused by the long-term construction work proposed for this site which includes 8 weeks to demolish buildings, followed by 6 weeks to establish construction facilities, with pavement and infrastructure works required (EIS, 10-112) The EIS contains limited mitigation proposed to manage such impacts.

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- The EIS states that 'a preferred noise mitigation option' would be determined during 'detailed design'. This is unacceptable and residents have no opportunity to comment on the detailed designs. The failure to include this detail means that residents have no idea as to what is planned and cannot comment or input into those plans. (Executive Summary xvi)
- The EIS states that the Rozelle interchange and the surrounds of the Anzac Bridge are currently close to capacity. With the proposed project construction the area is going to be subjected to a huge increase in vehicle movements throughout the area for 5 years. Even the 'with project' scenario states that this area will experience no improvement and if anything the current situation will be worse. This is totally unacceptable and proves that the whole project is a complete White Elephant. Indeed it is stated in the EIS that the only way to mitigate for this situation by 2033 is for the working population to adjust their work hours. "Due to forecast congestion, some of this traffic is predicted not to be able to start or finish their journey within the peak period. Some drivers will therefore choose to make their journey either earlier or later in the peak period to avoid delay. This behavior is called 'peak spreading'..." This is a categorical admission of failure of this complete project and a stupendous waste of Tax Payers money.
- The social and economic impact study notes the high value placed on community networks and social inclusion but does nothing to seriously evaluate the social impacts on these of WestCONnex. Any genuine assessment would draw on experience with the New M5 and M4 East rather than ignoring it. This lack of genuine engagement with social impact reduces the study to the level of a demographic description and a series of bland value statement
- The mechanical ventilation proposed depends on single direction tunnel construction, so how it can possibly work for large curved tunnels on multiple levels is unknown.
- Worker parking – Leichhardt. There is provision in the EIS for only a dozen worker car parks and no provision for the 100 or so workers who will be permanently based at the Darley Road site for up to five years. A major construction site project should not be permitted in a neighbourhood area without allocated parking for all workers. No other business would be permitted to be established without this requirement being satisfied – why is it acceptable for this project? In addition, the EIS proposes the removal of 20 car spaces used by residents on Darley Road and will remove the 'kiss and ride' facility at the light rail stop. This will result in residents being unable to park in their own street and will increase noise impacts from workers doing shift changeovers 24 hours a day.

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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.

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.

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


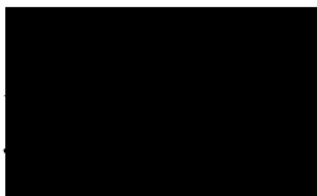

- ✚ The consultants for the Social and Economic Impact study is HillPDA. This company has a conflict of interest and is not an appropriate choice to do a social impact study of WestCONnex. Amongst its services it offers property valuation services and promotes property development in what are perceived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

- ✚ 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.

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

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

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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.

Signature:.....

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Submission to:

Planning Services,
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 GPO Box 39, Sydney, NSW, 2001

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name:
 WestConnex M4-M5 Link

- The accuracy of the traffic modelling outputs can only be as good as the accuracy of the inputs. Projections of key inputs relating to population and employment become very unreliable beyond 10 or 15 years. In addition to this, the transport sector is facing a potentially significant disruption from connected, automated vehicles that may have a significant impact on traffic growth. This has not been considered or modelled.
- Because the strategic model does not limit the volume on road links and at intersection to their ceiling capacity; it cannot (and was not designed to) be used precisely as it is. A mesoscopic model, which can provide more a far greater level of detail than the strategic model used would have ensured a more thorough analysis of the networks' ability to cope with the traffic predicted.
- The EIS admits that impacts of construction of the M4-M5 Link will worsen traffic on Parramatta Rd. In these circumstances it is outrageous for motorists to be asked already to pay up to up to \$20 a day in tolls. I object to the fact that this is not considered or factored into the traffic analysis.
- The EIS focusses on the impact of construction traffic during commuter peak-hours. Given the EIS notes that construction-related vehicles will be limited during peak-hours, information should be provided on the impact of construction-related vehicles when both traffic volumes are higher – in particular during weekday lunch peak and Saturday lunch peak for sites like the Pyrmont Bridge Road Tunnel Site where operations are proposed 24/7. (Tables 8-46, 8-47, 8-48, 8-51, 8-52, 8-53).
- I object to this new tollway because in the past tolls have been justified as needed to pay for the new road. This is not the case of this tollway that will charge tolls for 40 years. This is only to guarantee revenue to the new private owner.
- The EIS does not require an acoustic shed and states that 'Acoustic barriers and devices at the access tunnel entrances would be considered and implemented where reasonable and feasible to minimise potential noise impacts associated with out-of-hours works within the tunnels.'

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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.

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 _____

<p>Submission from:</p> <p>[REDACTED]</p> <p>Signature:..... [REDACTED]</p> <p>Please <u>include / exclude (circle)</u> my personal information when publishing this submission to your website Declaration : I HAVE NOT made any reportable political donations in the last 2 years.</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	<p>Submission to:</p> <p>Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001</p> <p>Attn: Director – Transport Assessments</p> <p>Application Number: SSI 7485 Application</p> <p>Application Name: WestConnex M4-M5 Link</p>
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I submit my objection to the WestConnex M4-M5 Link as contained in the EIS application # SSI 7485, for the following reasons, **and ask that the Minister reject the application and require preparation of a genuine, not indicative, EIS**

- The EIS states that an alternative truck movement is proposed which involves use of the City West Link and no need for spoil trucks to access darley Road. This proposal is supported, subject to further information about potential impacts being provided. The EIS should not be approved on its current basis which provides for 170 heavy and light vehicles accessing darley Road on a daily basis. This will create unacceptable safety issues and noise impacts for adjacent homes while also compromising pedestrian and bicycle access to the light rail and bay run. It will also lead to truck chaos aon this critical arterial road providing access to and across the City west Link. The current proposal which provides for truck movements solely on Darley Road should not be approved and approval should only be given to the alternative proposal. I repeat however my objection to the selection of this site altogether, but propose the least worst impact should be chosen if this site is to be used.
- The EIS indicates that 36 homes will have unacceptable noise impacts for extended periods at the Darley road construction site. The EIS does not mention the cumulative impact of aircraft noise in the leichhardt or St Peters area, and therefore does not reflect the true impact of construction noise on the amenity of nearby residents and businesses. The noise impacts of construction are not able to be mitigated to an acceptable level and the EIS should not be approved on this basis.
- We object to the selection of the Darley Road site on the basis that it provides for daily movements of 170 heavy and light vehicles accessing Darley Road. This creates an unacceptable risk to the safety of pedestrians accessing the North Leichhardt light rail stop as well as bicycle users accessing the bicycle route on Darley Road and entering Canal road to join the dedicated bike paths on the bay run. Many school children cross at this point to walk to Orange Grove and Leichhardt Secondary College. The EIS states that an alternative truck movement is proposed which involves use of the City West Link with no trucks to access Darley Road. The selection of Darley Road should not be approved if it involves any truck movements on Darley Road, which is what it currently provides.
- No workers associated with the WestConnex project should be permitted to park on local streets. Parking is at a premium in this area and many residents to not have off-street parking. The removal of 20 car spaces for five years as is proposed on Darley Road will worsen this situation as will the removal of 'kiss and ride facilities' at the light rail. There is also a pre-DA application for 120 units on William Street which is not taken into account in the EIS. This will place further stress on parking. The EIS needs to outright prohibit any worker parking on local streets.

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

Submission to:

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

Signature:.....

Attn: Director - Transport
Assessments

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Application Number: SSI 7485

Application Name:
WestConnex M4-M5 Link

- 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 Murphys building has asbestos which creates additional risk during the demolition process.
- The EIS needs to provide specific detail as to what will be provided by way of alternative accommodation to the 36 residents identified as suffering extreme noise interference. There is no plan to temporarily relocate such residents, not to offer them financial compensation to enable them to move out during the worst period. There is an estimated 10 weeks of extreme noise during demolition of the commercial building and preparatory road works. Once this work is finished the residents will also be forced to endure a truck every 3-4 minutes for a period of five years. It is clearly not possible for such residents to continue to live in these houses and the EIS needs to detail what will be provided in terms of alternative living arrangements for part, or all of the construction work period.
- 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 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.
- The EIS states that after the M4-m5 opens, that traffic on Darley Road will increase by 4%. There is no benefit in the overall project for residents. During construction westbound traffic will increase on Darley Road by 37%. This increase in traffic for a period of up to five years will make it hazardous to cross the road and access the light rail and travel to Blackmore oval, the bat run, the dog park and the Leichhardt pool. In addition, it will drastically increase both local traffic and outer area traffic at peak commute times. We therefore object to the location of this site based on the unacceptable traffic impacts it will have on road users and on pedestrians.

Submission from:	Submission to:
[REDACTED]	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature:..... [REDACTED]	Attn: Director – Transport Assessments
Please <u>include / exclude (circle)</u> my personal information when publishing this submission to your website Declaration : I HAVE NOT made any reportable political donations in the last 2 years.	Application Number: SSI 7485 Application
[REDACTED]	Application Name: WestConnex M4-M5 Link
[REDACTED]	

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

- The EIS 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.
- 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

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.

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.

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Name _____ Email _____ Mobile _____

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 150px; height: 15px;"></div>
Application Number: SSI 7485	<div style="background-color: black; width: 50px; height: 15px; display: inline-block;"></div> <div style="background-color: black; width: 150px; height: 15px; display: inline-block; margin-left: 10px;"></div> <div style="background-color: black; width: 30px; height: 15px; display: inline-block; margin-left: 10px;"></div>
Application Name: WestConnex M4-M5 Link	Signature: <div style="background-color: black; width: 150px; height: 30px; display: inline-block;"></div>
<p style="text-align: center;">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.</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, and request the Minister reject the application.

- | | |
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| <ul style="list-style-type: none"> ○ The business case is fatally flawed in a number of ways : <ul style="list-style-type: none"> ▪ It does not factor in the impact of longer total journey lengths on urban sprawl, which will have a flow-cost for infrastructure and servicing. ▪ It includes benefits from WestConnex supporting more compact commercial land use when this is generally not the result of motorway investment, and is unlikely to be in the area served by Stage 3. ▪ It does not attempt to cost the reductions in public transport, especially the loss of fare revenue. ▪ Ancillary road projects necessitated by WestConnex, such as the potentially \$1BN Alexandria-Moore Park Connectivity Upgrade, should have been included in the Business Case. ▪ Impact on property values, costs of noise during construction, and loss of business should all have been costed and included in the Business Case ▪ Loss of heritage to the whole community (not just property owners) should have been included in the Business Case. ○ The Business Case for the WestConnex project (made up of the New M4, Iron Cove Link and Rozelle Interchange, M4-M5 Link, New M5, King Georges Road Interchange upgrade and Sydney | <p>Gateway was not adequate to justify moving to environmental impact assessment.</p> <ul style="list-style-type: none"> ○ The Government is spending many billions of taxpayer dollars via Metro Rail to try and free itself of the restrictions of the City Circle that imposes a choke on the whole rail network, but is now replicating a the city circle with a 60km road network. It does makes sense to focus a rail network on the centre of the densest employment and residential area of Australia, with the greatest economic output per square kilometre. However, it is the antithesis of common sense, practicality, economic productivity, property value creation, environmental planning, social planning and basic transport planning to replicate it with more motorways. ○ The M4-M5 Link enables the expansion of the WestConnex network to include the Western Harbour Tunnel, Beaches Link and M6. These motorway projects, were not part of the WestConnex business case and are not priority projects in any State or Federal roads plan. |
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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:


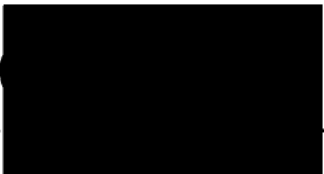

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I object to the WestConnex M4-M5 Link proposals for the following reasons, and request the Minister reject the application, and require SMC and RMC to prepare a new EIS that is based on genuine, not indicative, design parameters, costings, and business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

- The EIS 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.
- 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.
- 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.
- This EIS treats the public with contempt. It offers no final design, no commitment to an outcome and only the most vague and unreliable traffic modelling. It seeks to get NSW Government approval so that the opportunity to design, build, operate, maintain and toll the road can be sold to private investors, completely outside of the view of the public who will bear the effects on their community for the next 100 years. This is a continuation of the appalling disregard for transparency and disregard of the population that bears the brunt of the WestConnex traffic impacts. It displays a lack of understanding of contemporary good practice in transport problem resolution.
- The EIS is based on the fallacy that the M4 and-M5 need linking when they are already linked by the M7, A6 and A3. The A3 is the primary eastern link between the two motorways and is shown in the State Road network hierarchy as the M4-M5 Connector.
- 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: Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature:..... 	Attn: Director – Transport Assessments
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. 	Application Number: SSI 7485 Application Application Name: WestConnex M4-M5 Link

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

- *An on-line interactive map was published with the M4-M5 Concept Design that indicated a very wide yellow 'swoosh' that is upwards of a kilometre wide in some sections of the M4-M5 proposals. SMC have NEVER publicly published or acknowledged that the contractor to be appointed to build the tunnels will be 'encouraged' to do so within the yellow swoosh footprint, but may go outside the indicative swoosh area if found necessary after further geotech and survey work. The proposed Sydney Water Tunnels surveys (EIS 12-57) could potentially see a dramatic change in the tunnel alignments in the Newtown area. Why were these surveys not done during the past three years such that 'definitive' rather than 'indicative' alignments could be published. The EIS should be withdrawn till such time that it is a true and fair 'definitive' document open for genuine public comment.*
- *I object to the location of a permanent substation and water treatment plant following the completion of the project on the Darley Road site. This will limit the future uses of the land and the community has been continually assured that the land, which is Government-owned, would be available for community purposes. The presence of this facility will forever prevent the ability for safe and direct pedestrian access to the light rail stop, with users required to walk down a dark and winding path. It will also limit the future use of the site. If a permanent facility is to be located then it should be moved to the north of the site so that it is out of sight of homes and has less visual impact on residents.*
- *Traffic operational modelling – Leichhardt. The EIS does not provide any operational modelling for the Darley Road area (8-11), despite the fact 170 vehicles a day are proposed to enter this highly congested (during peak hours) area. Darley Road is a critical arterial road for commuters accessing the City West Link and this analysis should be provided so that impacts can be properly assessed.*
- *There is a higher than average number of shift workers in the Inner West. The EIS acknowledges that even allowing for mitigation measures such as acoustic sheds and noise walls, shift workers will be more vulnerable to impacts of years of construction work and will consequently be at risk of a loss of quality of life, loss of productivity and chronic mental and physical illness.*
- *The project directly affected five listed heritage items, including demolition of the stormwater canal at Rozelle. Twenty-one other statutory heritage items of State or local heritage significant would be subject to indirect impacts through vibration, settlement and visual setting. And directly affected nine individual buildings as assessed as being potential local heritage items. It is unacceptable that heritage items are removed or potentially damaged and the approval should prohibit such destruction.(Executive Summary xviii)*

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Name _____ Email _____ Mobile _____

Submission from: [Redacted] 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. [Redacted]	Submission to: Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001 Attn: Director – Transport Assessments Application Number: SSI 7485 Application Application Name: WestConnex M4-M5 Link
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I submit my objection to the WestConnex M4-M5 Link as contained in the EIS application # SSI 7485, for the following reasons, **and ask that the Minister reject the application and require preparation of a genuine, not indicative, EIS**

- The EIS permits trucks to access local roads in exceptional circumstances which includes queuing at the site. Given the constraints of the Darley Road site queuing will be the usual situation. The EIS needs to be amended to remove queuing as an exceptional circumstance. The truck movements should properly managed by the contractor so that there is no queuing. This exception will make it easier for contractors to neglect their obligation to monitor and manage truck movements in and out of the site and needs to be removed. The EIS needs to specifically mention all local streets abutting Darley Road and expressly prohibited truck movements (including parking) on these streets. This should include all streets from the north (James St) to the south (Falls Road), which are near the project footprint.
- 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 will change if the design changes. My understanding is that the design could change without the public being specifically notified or given the chance for feedback. This means that there is a possibility of hundreds of residents being severely impacted who are not even identified in this EIS. I find this completely unacceptable.
- Streets in Haberfield would be subject to heavy vehicle traffic for a further four years, making at least 7 years of heavy impacts on a single suburb. The answer is not a "community strategy". Residents who believed that their pain would be over after the M4 east are now being asked to sustain a further four years of impacts. No compensation or serious mitigation is suggested.
- The assessment of Strategic Alternative 2 (Investment in "alternative transport" modes) should:
 - identify key network capacity issues
 - identify the shift away from private vehicles required to deliver the necessary relief on the road network to meet the future transport needs of Sydney
 - identify the mix of investments in public transport, cycling and walking required to deliver these mode splits.
 - use multi-modal transport modelling and economic assessment to inform the analysis and assessment of the alternative.
- The EIS states that investigation would be undertaken to confirm whether the Victoria Road bridge is a potential roost site for microbats. There will be attempts to 'manage potential impacts' if confirmed. This is inadequate. The project should not be permitted to impact on vulnerable species.

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Name _____ Email _____ Mobile _____

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

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.

- | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> ▪ The EIS states that the risk of ground settlement is lessened where tunnelling is more than 35m (EIS Vol 2B App E p1). Yet the depths of tunnelling in streets leading to and around the Inner West Interchange are astonishingly low, eg John St at 22m, Emma St at 24m, Hill St at 28m, Moore St 27m, Piper St 37m, (Vol 2B Appendix E Part 2), Catherine St at 28m (Vol 2B Appendix E Part 1) - homes would indisputably sustain damage or cracking at these depths. ▪ Given that the modelling for air quality is based on the traffic modelling, which, as shown above, is fundamentally flawed, and given poor air quality has a significant health impact the EIS should not be approved until an independent scientifically qualified reviewer has analysed the stated air quality outcomes and identified any deficits ▪ Concentrations of some pollutants PM_{2.5} and PM₁₀ are already near the current standard and in excess of proposed standards (p9-81, p9-93). It is critical to note that these particulates are a classified carcinogen and are known to have critical, and at times fatal, consequences if elevated. People living within 500 metres of heavily affected areas have demonstrably shorter lives, much higher incidences of chronic lung conditions and higher levels of cardiovascular diseases. | <ul style="list-style-type: none"> ▪ I object to the whole WestConnex project and Stage 3, the M4-M5 Link in particular, because I object to paying high tolls to fund a road project that does not benefit Western Sydney. ▪ The EIS notes that an 'Operational Traffic Performance Review' will be undertaken at 12 months and five years after the M4-M5 Link is open to consider the need for "post-opening mitigation measures" (Page 223, Chapter 9.8, Appendix H). I object to this approach as it is contrary to the requirements of the EIS process and reflects a clear admission on the part of the NSW Government that: <ul style="list-style-type: none"> ◊ It has no confidence in the traffic modelling process to predict to any reliable extent the likely impacts of the Project; ◊ It is unable or unprepared to describe the true impacts of the Project on the people of NSW; ◊ It has not considered or budgeted for the potentially significant additional roadworks required to address the impacts of the Project (or the need for road upgrades to feed toll-paying drivers to WestConnex. ▪ The modelling conclusions are internally inconsistent. There is an assumption that traffic would dissipate at the edge of the motorway with no negative impacts on the CBD, Mascot and Alexandria. However there is also an assumption that additional roads would be needed to cope with said traffic. |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

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Name _____ Email _____ Mobile _____

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 150px; height: 15px;"></div>
Application Number: SSI 7485	<div style="background-color: black; width: 100px; height: 15px; display: inline-block;"></div> <div style="background-color: black; width: 150px; height: 15px; display: inline-block;"></div>
Application Name: WestConnex M4-M5 Link	Signature: <div style="background-color: black; width: 150px; height: 15px; display: inline-block;"></div>
<p style="text-align: center;">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.</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, and request the Minister reject the application.

- | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>⇒ The key intersection performance tables in App H (p.258 St Peters and 248 Rozelle) demonstrate that many intersections will either worsen (at the worst case scenario of LOS F) or remain unchanged particularly in 2033, including the following intersections:</p> <ul style="list-style-type: none"> ▪ 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 <p>⇒ I object to this new tollway because in the past tolls have been justified as needed to pay for the new road. This is not the case of this tollway that will charge tolls for 40 years. This is only to guarantee revenue to the new private owner.</p> <p>⇒ The proponent excludes the impact of the Western Sydney Airport from analysis of the project. This could have a significant impact on traffic volumes.</p> <p>⇒ The modelling shows significant increases in traffic on Victoria Rd (+20% ADT) which is already at capacity.</p> | <p>⇒ Most people in Emu Plains, Penrith, Mt Druitt, or Blacktown who work in Sydney CBD use the trains. What workers travelling to Sydney city really need are better and more frequent trains. This is just dismissed by the EIS.</p> <p>⇒ Most people in Emu Plains, Penrith, Mt Druitt, or Blacktown who work in Sydney CBD use the trains. What workers travelling to Sydney city really need are better and more frequent trains. This is just dismissed by the EIS.</p> <p>⇒ The modelling shows the motorway exceeds reasonable operating limits in the peak in less than ten years.</p> <p>⇒ The underlying traffic modelling and outputs was insufficient to:</p> <ul style="list-style-type: none"> ▪ Demonstrate the need for the project. ▪ Understand impacts of dispersed traffic on connecting roads, such as the Anzac Bridge, and whether they have available capacity to meet the predicted traffic discharge. Any congestion on exits has the capacity to negate all travel time savings to the exit point, given the small predicted benefits. |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

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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

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.

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 object to the proposal to the Darley Road civil and tunnel site because of the unacceptable risk it will create to the safety of our community. Darley Road is a known accident and traffic blackspot and the movements of hundreds of trucks a day will create an unacceptable risk of accidents. On Transport for NSW's own figures, the intersection at the City West Link and James Street is the third most dangerous in the inner west.
- The EIS states that spoil haulage hours will be restricted but ignores the fact that the same was promised for the M4 East but these promises have been ignored repeatedly.
- The EIS states that 'reasonable and feasible work practices and mitigation measures would be implemented to minimise potential noise impacts due to activities occurring at the Darley Road civil and tunnel site.' 96-52) This is not good enough. The EIS does not contain any detail whatsoever of these proposal on which they can comment. In addition, there is no requirement that measures will in fact be introduced to address noise impacts. The approval conditions need to contain detail of specific noise mitigation measures that are mandated and can be enforced.
- 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.
- Unacceptable noise levels will accompany the construction of this massive interchange. No analysis has been provided of the magnitude of increased noise pollution which will adversely affect the local citizens.
- The EIS states "Direct and indirect traffic disruptions are likely to be experienced on local and arterial roads in most suburbs that are in close proximity to construction sites. This would include the suburbs of Ashfield, Haberfield, St Peters, Camperdown, Annandale, Lilyfield, Leichhardt, and Rozelle." Despite this finding, the study then pushes these negative impacts aside as inevitable. There is never any evaluation of whether in the light of the negative impacts an alternative public infrastructure project might be preferable

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

Signature:.....

Attn: Director – Transport
Assessments

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

Application Number: SSI 7485

Application Name:
WestConnex M4-M5 Link

- The EIS permits trucks to access local roads in exceptional circumstances which includes queuing at the site. Given the constraints of the Darley Road site queuing will be the usual situation. The EIS needs to be amended to remove queuing as an exceptional circumstance. The truck movements should properly managed by the contractor so that there is no queuing. This exception will make it easier for contractors to neglect their obligation to monitor and manage truck movements in and out of the site and needs to be removed. The EIS needs to specifically mention all local streets abutting Darley Road and expressly prohibited truck movements (including parking) on these streets. This should include all streets from the north (James St) to the south (Falls Road), which are near the project footprint.
- The EIS states that there are 'investigations' occurring into alternative access to the Darley Road site. The EIS does not provide any detail on which residents can comment about alternative access which would keep trucks off Darley Road. The plans for alternative access should be expedited. It should be a condition of approval that the alternative access is confirmed and that no spoil trucks are permitted to access Darley Road due to the unacceptable noise, safety and traffic issues that the current proposal creates.
- There is no need for the Darley Road site, other than a time saving (tunneling) of several months. It is unacceptable that the community should be forced to endure 5 years of severe disruption to accommodate the timetable of the private contractors. The EIS should not be approved on the basis that it contains provision for the Darley Road site without any proper justification as for its need.
- The EIS states that the contractor may decide upon additional 'construction ancillary facilities' to the 12 identified in the EIS. The EIS should not be approved on the basis that there may be more unidentified sites taken, as residents will have no opportunity to comment on their impacts. The approval condition should limit any construction facilities to those already notified and detailed in the EIS.
- The 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.



Submission from: [Redacted] 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. [Redacted]	Submission to: Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001 Attn: Director – Transport Assessments Application Number: SSI 7485 Application Application Name: WestConnex M4-M5 Link
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I submit my objection to the WestConnex M4-M5 Link as contained in the EIS application # SSI 7485, for the following reasons, **and ask that the Minister reject the application and require preparation of a genuine, not indicative, EIS**

- *The EIS states that property damage due to ground movement may occur. We object to the project in its entirety on this basis. The EIS states that 'settlement, induced by tunnel excavation, and groundwater drawdown, may occur in some areas along the tunnel alignment'. The risk of ground movement is lessened where tunnelling is more than 35 metres. However, some tunnelling is at less than 10 metres. This proposed tunnel alignment creates an unacceptable risk of ground movement. In addition, the EIS states that there are a number of discrete areas to the north and northwest of the Rozelle Rail Yards, to the north of Campbell Road at St Peters and in the vicinity of Lord Street at Newtown where ground water movement above 20 milliliters is predicted 'strict limits on the degree of settlement permitted would be imposed on the project' and 'damage' would be rectified at no cost to the owner. would be placed (Executive Summary, xvii -iii). The project should not be permitted to be delivered in such a way that there is a known risk to property damage that cannot be mitigated to an acceptable level of risk.*
- *Why the so called 'King Street Gateway' been excluded in the analysis of cumulative impacts of other projects ?*
- *Noise mitigation – Leichhardt. The noise mitigation proposed in the EIS is unacceptable. No detail of noise walls is provided, giving residents no opportunity to comment on whether final impacts are acceptable. This is despite the fact 36 homes are identified in the EIS as severely affected by construction noise. The acoustic shed proposed is of the lowest grade and does not cover the entire site, resulting in noise impacts from the movement of trucks in and out of the tunnel access point. The highest grade acoustic shed should be provided, with the shed covering the entire site. The additional noise mitigation such as noise walls, need to be det out in detail so that residents can properly comment on the impacts.*
- *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.*
- *The EIS acknowledges that extra construction traffic will add to travel times across the Inner West and have a negative impact on businesses in the area. No compensation is suggested. These impacts are not been taken into account of evaluating the cost of WestCONnex.*
- *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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	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature:.....	Attn: Director – Transport Assessments
Please include my personal information when publishing this submission to your website Declaration : I HAVE NOT made any reportable political donations in the last 2 years.	Application Number: SSI 7485 Application
	Application Name: WestConnex M4-M5 Link

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

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

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Name _____ Email _____ Mobile _____

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: FW: Submission Details

From: system@accelo.com On Behalf Of [REDACTED]
Sent: Monday, 16 October 2017 8:18:07 AM (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:

The proposal as it currently stands will have a detrimental effect on air quality in the Nth Annandale area, 3 massive ventilation stacks of unfiltered toxins spewing into our close proximity, along with tunnel entrances and exits will create massive future health problems for local residents.

The increase in noise of closer, larger busier roads plus extra traffic lights near the corner of Brennan and Railway parade which cause much more start stop traffic has not been sensitively planned being forced on a small residential area.

Finally the loss of yet more green space by cutting across Buruwan Park is lazy planning as it's worse, this is an existing necessary natural noise barrier to existing traffic, and as i read it no where in the proposal is any increase in sound barrier height or length to protect existing residents.

From the expert opinions available outside the secrecy of this project it appears this corner of Rozelle will have the worse air quality in Sydney Basin and the residents health has been given no consideration within the project in case it is detrimental to cost or increased burden on the ultimate owner of the roads.

IP Address: - [REDACTED]

Submission: Online Submission from [REDACTED] (object)

https://majorprojects.accelo.com/?action=view_activity&id=227897

Submission for Job: #7485 WestConnex M4-M5 Link

https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: FW: Submission Details

From: system@accelo.com On Behalf Of [REDACTED]
Sent: Monday, 16 October 2017 8:30:06 AM (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:

As a resident living close to the construction site and within close proximity to an exhaust stake that has been established, I strongly concerned about unfiltered exhaust stacks in our local community and I 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, Haberfield and Rozelle are entirely unacceptable. History has found the Earlwood community suffered the same issues 15 years ago when the M5 east tunnel was constructed and an air stack being installed, with consequent health issues impacting the Earlwood and Bexley communities. An alternative solution must be investigated to mitigate air pollution in the area in order for the west connex project to succeed.

IP Address: [REDACTED]

Submission: Online Submission from [REDACTED] (comments)

https://majorprojects.accelo.com/?action=view_activity&id=227902

Submission for Job: #7485 WestConnex M4-M5 Link

https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

From: [REDACTED]
Sent: Sun, 15 Oct 2017 21:33:20 +0000
To: [REDACTED]
Subject: FW: Submission Details for Stephen Kinsella (object)

From: system@accelo.com On Behalf Of Stephen Kinsella
Sent: Monday, 16 October 2017 8:33:04 AM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for Stephen Kinsella (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Stephen Kinsella
 [REDACTED]

Address:
 [REDACTED]

Rozelle, NSW
 2039

Content:

Stop the unfiltered smoke stack at Terry Street. What a woeful approach to the whole design of this piece of infrastructure rather than seriously looking at public transport options.

This is near schools

This is near the Bay Walk where thousands use it every day for, ironically, some fresh air

This is near residential housing

Why would you want to compromise the health of your fellow citizens

[REDACTED]
 Submission: Online Submission from Stephen Kinsella (object)
https://majorprojects.accelo.com/?action=view_activity&id=227904

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

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

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: FW: Submission Details

From: system@accelo.com On Behalf Of [REDACTED]
Sent: Monday, 16 October 2017 8:44:03 AM (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:

Please do not construct the unfiltered WestConnex Iron Cove Stack on Terry Street.

This stack will be constructed only 100 metres from Rozelle Public School, and 50 metres from my home. I do not wish to be affected by noise, pollution, traffic both during and post construction. I shudder to think the effect on one's health of the unfiltered emissions stack so close to my home.

IP Address: [REDACTED]

Submission: Online Submission from [REDACTED] (object)

https://majorprojects.accelo.com/?action=view_activity&id=227906

Submission for Job: #7485 WestConnex M4-M5 Link

https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: FW: Submission Details

From: system@accelo.com On Behalf Of [REDACTED]
Sent: Monday, 16 October 2017 9:01:04 AM (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:

On reviewing the EIS and the lack of certainty about where the tunnels will be in the Leichardt/Annandale/Lilyfield area I would strongly encourage you to ensure the alignment goes under existing roads rather than houses. This would minimise concern in the community about roads going under their houses and reduces the number of people concerned about noise as tunnel boring machines do their work underground.

I urge you to give strong consideration to this request.

IP Address: [REDACTED]

Submission: Online Submission from [REDACTED] (comments)
https://majorprojects.accelo.com/?action=view_activity&id=227920

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

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

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: FW: Submission Details
Attachments: 227922_WestConnex EIS objections_2017Oct16_0902.pdf

From: system@accelo.com On Behalf Of [REDACTED]
Sent: Monday, 16 October 2017 9:04:06 AM (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]

Content:

The M4-M5 Link will see whole areas of Sydney under threat - again. More trees and homes will be lost. More residents will be displaced from their homes and communities. Sydney will become less liveable as a result.

The M4-M5 Link planning approval will include the connections for the Western Harbour Tunnel - this is a government investment in the Western Harbour Tunnel even though we are told no decisions have been made.

The M4-M5 Link will overload the Anzac Bridge with traffic - and that will then make the Western Harbour Tunnel 'necessary' - the EIS even identifies the Western Harbour Tunnel as mitigation for the impacts of the M4-M5 Link. This is ridiculous and exposes the fallacy of constructing motorways to 'solve' congestion.

IP Address: - [REDACTED]
 Submission: Online Submission from [REDACTED] (object)
https://majorprojects.accelo.com/?action=view_activity&id=227922

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

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

WestConnex EIS objections

One of the objectives of the M4-M5 is to facilitate the Western Harbour Tunnel and Beaches Link - which supposedly are still being planned, are subject to a reference design and government funding and planning approval.

The M4-M5 Link will overload the Anzac Bridge with traffic - and that will then make the Western Harbour Tunnel 'necessary' - the EIS even identifies the Western Harbour Tunnel as mitigation for the impacts of the M4-M5 Link. This is ridiculous and exposes the fallacy of constructing motorways to 'solve' congestion.

The M4-M5 Link planning approval will include the connections for the Western Harbour Tunnel - this is a government investment in the Western Harbour Tunnel even though we are told no decisions have been made.

The M4-M5 Link - like other sections of WestConnex - will induce additional traffic on to the road network - just building up congestion and the need for more roads across Sydney.

Tolls on WestConnex will almost certainly be rising faster than wages - making these toll roads ever more unaffordable and pushing more traffic on to local surface roads.

The M4-M5 Link will concentrate pollutants from exhaust and roads including particulate matter which will then be vented out through stacks. These carcinogenic pollutants will impact wide areas of Sydney with the particularly damaging finer particulates spreading out across the metropolitan area. More air pollutants result in more people dying prematurely from a range of diseases and conditions.

Surface roads will be used by traffic entering and leaving the motorway portals - and by traffic avoiding the cost of tolls. This traffic makes us less safe - the EIS demonstrates that more traffic results in more road traffic accidents.

The M4-M5 Link will increase traffic on the Anzac Bridge, impact Sydney's city centre. This will reduce the economic efficiency of the city centre - and the whole of Sydney, NSW and Australia relies on the Sydney city centre economically.

It is likely that my children - who are still too young to hold driving licenses - will be retired before the concession period expires on the M4-M5 Link. Throughout their working lives they will be paying taxes to support WestConnex. This is even more ridiculous given all predictions are that personal transport will have changed hugely in a fraction of this time - in all likelihood we will not be owning or driving our own cars within the next 30 years.

The M4-M5 Link will see whole areas of Sydney under threat - again. More trees and homes will be lost. More residents will be displaced from their homes and communities. Sydney will become less liveable as a result.

From: [REDACTED]
Sent: Sun, 15 Oct 2017 22:11:09 +0000
To: [REDACTED]
Subject: FW: Submission Details for company Sydney Airport (org_comments)
Attachments: 227926_171016 Submission from Sydney Airport_FINAL_2017Oct16_0906.pdf,
227926_171016 Submission from Sydney Airport_FINAL_Political donations disclosure
statement_2017Oct16_0906.pdf

From: system@accelo.com On Behalf Of Edwin Plummer
Sent: Monday, 16 October 2017 9:08:14 AM (UTC+10:00) Canberra, Melbourne, Sydney
[REDACTED]
Subject: Submission Details for company Sydney Airport (org_comments)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: yes

Name: Edwin Plummer
Organisation: Sydney Airport (Head of Government and Community Relations)
Govt. Agency: No
Email: ted.plummer@syd.com.au

Address:
[REDACTED]

Sydney International Airport, NSW
2020

Content:
see attached

IP [REDACTED]
Submission: Online Submission from company Sydney Airport (org_comments)
https://majorprojects.accelo.com/?action=view_activity&id=227926

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

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

Political donations disclosure statement



NSW GOVERNMENT
Department of Planning

Office use only:

Date received: ____/____/____

Planning application no. _____

This form may be used to make a political donations disclosure under section 147(3) of the *Environmental Planning Assessment Act 1979* for applications or public submissions to the Minister or the Director-General.

Please read the following information before filling out the Disclosure Statement on pages 3 and 4 of this form. Also refer to the 'Glossary of terms' provided overleaf (for definitions of terms in *italics* below). Once completed, please attach the completed declaration to your planning application or submission.

Explanatory information

Making a planning application or a public submission to the Minister or the Director-General

Under section 147(3) of the Environmental Planning and Assessment Act 1979 ('the Act') a person:

- (a) who makes a *relevant planning application* to the Minister or the Director-General is required to disclose all *reportable political donations* (if any) made within the *relevant period* to anyone by any *person with a financial interest* in the application, or
- (b) who makes a *relevant public submission* to the Minister or the Director-General in relation to the application is required to disclose all *reportable political donations* (if any) made within the *relevant period* to anyone by the person making the submission or any *associate of that person*.

How and when do you make a disclosure?

The disclosure to the Minister or the Director-General of a *reportable political donation* under section 147 of the Act is to be made:

- (a) in, or in a statement accompanying, the relevant planning application or submission if the donation is made before the application or submission is made, or
- (b) if the donation is made afterwards, in a statement of the person to whom the relevant planning application or submission was made within 7 days after the donation is made.

What information needs to be included in a disclosure?

The information requirements of a disclosure of reportable political donations are outlined in section 147(9) of the Act.

Pages 3 and 4 of this document include a Disclosure Statement Template which outlines the information requirements for disclosures to the Minister or to the Director-General of the Department of Planning.

Note: A separate Disclosure Statement Template is available for disclosures to councils.

Warning: A person is guilty of an offence under section 125 of the *Environmental Planning and Assessment Act 1979* in connection with the obligations under section 147 only if the person fails to make a disclosure of a political donation or gift in accordance with section 147 that the person knows, or ought reasonably to know, was made and is required to be disclosed under section 147.

The maximum penalty for any such offence is the maximum penalty under Part 6 of the *Election Funding and Disclosures Act 1981* for making a false statement in a declaration of disclosures lodged under that Part.

Note: The maximum penalty is currently 200 penalty units (currently \$22,000) or imprisonment for 12 months, or both.

Glossary of terms (under section 147 of the *Environmental Planning and Assessment Act 1979*)

gift means a gift within the meaning of Part 6 of the *Election Funding and Disclosures Act 1981*. Note. A gift includes a gift of money or the provision of any other valuable thing or service for no consideration or inadequate consideration.

Note: Under section 84(1) of the *Election Funding and Disclosures Act 1981* gift is defined as follows:

gift means any disposition of property made by a person to another person, otherwise than by will, being a disposition made without consideration in money or money's worth or with inadequate consideration, and includes the provision of a service (other than volunteer labour) for no consideration or for inadequate consideration.

local councillor means a councillor (including the mayor) of the council of a local government area.

relevant planning application means:

- a) a formal request to the Minister, a council or the Director-General to initiate the making of an environmental planning instrument or development control plan in relation to development on a particular site, or
- b) a formal request to the Minister or the Director-General for development on a particular site to be made State significant development or declared a project to which Part 3A applies, or
- c) an application for approval of a concept plan or project under Part 3A (or for the modification of a concept plan or of the approval for a project), or
- d) an application for development consent under Part 4 (or for the modification of a development consent), or
- e) any other application or request under or for the purposes of this Act that is prescribed by the regulations as a relevant planning application, but does not include:
 - f) an application for (or for the modification of) a complying development certificate, or
 - g) an application or request made by a public authority on its own behalf or made on behalf of a public authority, or
 - h) any other application or request that is excluded from this definition by the regulations.

relevant period is the period commencing 2 years before the application or submission is made and ending when the application is determined.

relevant public submission means a written submission made by a person objecting to or supporting a relevant planning application or any development that would be authorised by the granting of the application.

reportable political donation means a reportable political donation within the meaning of Part 6 of the *Election Funding and Disclosures Act 1981* that is required to be disclosed under that Part. Note. Reportable political donations include those of or above \$1,000.

Note: Under section 86 of the *Election Funding and Disclosures Act 1981* reportable political donation is defined as follows:

86 Meaning of "reportable political donation"

- (1) For the purposes of this Act, a reportable political donation is:
 - (a) in the case of disclosures under this Part by a party, elected member, group or candidate—a political donation of or exceeding \$1,000 made to or for the benefit of the party, elected member, group or candidate, or
 - (b) in the case of disclosures under this Part by a major political donor—a political donation of or exceeding \$1,000:
 - (i) made by the major political donor to or for the benefit of a party, elected member, group or candidate, or
 - (ii) made to the major political donor.
- (2) A political donation of less than an amount specified in subsection (1) made by an entity or other person is to be treated as a reportable political donation if that and other separate political donations made by that entity or other person to the same party, elected member, group, candidate or person within the same financial year (ending 30 June) would, if aggregated, constitute a reportable political donation under subsection (1).
- (3) A political donation of less than an amount specified in subsection (1) made by an entity or other person to a party is to be treated as a reportable political donation if that and other separate political donations made by that entity or person to an associated party within the same financial year (ending 30 June) would, if aggregated, constitute a reportable political donation under subsection (1). This subsection does not apply in connection with disclosures of political donations by parties.
- (4) For the purposes of subsection (3), parties are associated parties if endorsed candidates of both parties were included in the same group in the last periodic Council election or are to be included in the same group in the next periodic Council election.

a person has a financial interest in a relevant planning application if:

- a) the person is the applicant or the person on whose behalf the application is made, or
- b) the person is an owner of the site to which the application relates or has entered into an agreement to acquire the site or any part of it, or
- c) the person is associated with a person referred to in paragraph (a) or (b) and is likely to obtain a financial gain if development that would be authorised by the application is authorised or carried out (other than a gain merely as a shareholder in a company listed on a stock exchange), or
- d) the person has any other interest relating to the application, the site or the owner of the site that is prescribed by the regulations.

persons are associated with each other if:

- a) they carry on a business together in connection with the relevant planning application (in the case of the making of any such application) or they carry on a business together that may be affected by the granting of the application (in the case of a relevant planning submission), or
- b) they are related bodies corporate under the *Corporations Act 2001* of the Commonwealth, or
- c) one is a director of a corporation and the other is any such related corporation or a director of any such related corporation, or
- d) they have any other relationship prescribed by the regulations.

Political Donations Disclosure Statement to Minister or the Director-General

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

Disclosure statement details				
Name of person making this disclosure SYDNEY AIRPORT (TED PLUMMER)		Planning application reference (e.g. DA number, planning application title or reference, property address or other description) WESTCONNEX M4-M5 LINK (SSI 16 7485)		
Your interest in the planning application (circle relevant option below)				
You are the APPLICANT YES / NO OR You are a PERSON MAKING A SUBMISSION IN RELATION TO AN APPLICATION YES NO				
Reportable political donations made by person making this declaration or by other relevant persons				
<p>* State below any reportable political donations you have made over the 'relevant period' (see glossary on page 2). If the donation was made by an entity (and not by you as an individual) include the Australian Business Number (ABN).</p> <p>* If you are the applicant of a relevant planning application state below any reportable political donations that you know, or ought reasonably to know, were made by any persons with a financial interest in the planning application, OR</p> <p>* If you are a person making a submission in relation to an application, state below any reportable political donations that you know, or ought reasonably to know, were made by an associate.</p>				
Name of donor (or ABN if an entity)	Donor's residential address or entity's registered address or other official office of the donor	Name of party or person for whose benefit the donation was made	Date donation made	Amount/ value of donation
ABN 18165056360	CENTRAL TERRACE BUILDING 16 ARRIVALS COURT SYDNEY INTERNATIONAL AIRPORT 2020 NSW	NSW NATIONALS (ANN. CONF. PACKAGE)	30/03/17	\$4,500
"	"	FEDERAL ALP BUSINESS EXCHANGE	11/05/17	\$10,000
"	"	LIBERAL PARTY (BRADFELD FEC)	15/05/17	\$100
Please list all reportable political donations—additional space is provided overleaf if required.				
By signing below, I/we hereby declare that all information contained within this statement is accurate at the time of signing.				
Signature(s) and Date Ted Plummer 16/10/17				
Name(s) EDWIN (TED) PLUMMER				

Political donations disclosure statement



NSW GOVERNMENT
Department of Planning

Office use only:

Date received: ____/____/____

Planning application no. _____

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- (b) who makes a *relevant public submission* to the Minister or the Director-General in relation to the application is required to disclose all *reportable political donations* (if any) made within the *relevant period* to anyone by the person making the submission or any *associate of that person*.

How and when do you make a disclosure?

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- (a) in, or in a statement accompanying, the relevant planning application or submission if the donation is made before the application or submission is made, or
- (b) if the donation is made afterwards, in a statement of the person to whom the relevant planning application or submission was made within 7 days after the donation is made.

What information needs to be included in a disclosure?

The information requirements of a disclosure of reportable political donations are outlined in section 147(9) of the Act.

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Note: Under section 84(1) of the *Election Funding and Disclosures Act 1981* gift is defined as follows:

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local councillor means a councillor (including the mayor) of the council of a local government area.

relevant planning application means:

- a) a formal request to the Minister, a council or the Director-General to initiate the making of an environmental planning instrument or development control plan in relation to development on a particular site, or
- b) a formal request to the Minister or the Director-General for development on a particular site to be made State significant development or declared a project to which Part 3A applies, or
- c) an application for approval of a concept plan or project under Part 3A (or for the modification of a concept plan or of the approval for a project), or
- d) an application for development consent under Part 4 (or for the modification of a development consent), or
- e) any other application or request under or for the purposes of this Act that is prescribed by the regulations as a relevant planning application, but does not include:
 - f) an application for (or for the modification of) a complying development certificate, or
 - g) an application or request made by a public authority on its own behalf or made on behalf of a public authority, or
 - h) any other application or request that is excluded from this definition by the regulations.

relevant period is the period commencing 2 years before the application or submission is made and ending when the application is determined.

relevant public submission means a written submission made by a person objecting to or supporting a relevant planning application or any development that would be authorised by the granting of the application.

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 - (b) in the case of disclosures under this Part by a major political donor—a political donation of or exceeding \$1,000:
 - (i) made by the major political donor to or for the benefit of a party, elected member, group or candidate, or
 - (ii) made to the major political donor.
- (2) A political donation of less than an amount specified in subsection (1) made by an entity or other person is to be treated as a reportable political donation if that and other separate political donations made by that entity or other person to the same party, elected member, group, candidate or person within the same financial year (ending 30 June) would, if aggregated, constitute a reportable political donation under subsection (1).
- (3) A political donation of less than an amount specified in subsection (1) made by an entity or other person to a party is to be treated as a reportable political donation if that and other separate political donations made by that entity or person to an associated party within the same financial year (ending 30 June) would, if aggregated, constitute a reportable political donation under subsection (1). This subsection does not apply in connection with disclosures of political donations by parties.
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a person has a financial interest in a relevant planning application if:


- a) the person is the applicant or the person on whose behalf the application is made, or
- b) the person is an owner of the site to which the application relates or has entered into an agreement to acquire the site or any part of it, or
- c) the person is associated with a person referred to in paragraph (a) or (b) and is likely to obtain a financial gain if development that would be authorised by the application is authorised or carried out (other than a gain merely as a shareholder in a company listed on a stock exchange), or
- d) the person has any other interest relating to the application, the site or the owner of the site that is prescribed by the regulations.

persons are associated with each other if:

- a) they carry on a business together in connection with the relevant planning application (in the case of the making of any such application) or they carry on a business together that may be affected by the granting of the application (in the case of a relevant planning submission), or
- b) they are related bodies corporate under the *Corporations Act 2001* of the Commonwealth, or
- c) one is a director of a corporation and the other is any such related corporation or a director of any such related corporation, or
- d) they have any other relationship prescribed by the regulations.

Political Donations Disclosure Statement to Minister or the Director-General

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

Disclosure statement details				
Name of person making this disclosure SYDNEY AIRPORT (TED PLUMMER)		Planning application reference (e.g. DA number, planning application title or reference, property address or other description) WESTCONNEX M4-M5 LINK (SSI 16 7485)		
Your interest in the planning application (circle relevant option below)				
You are the APPLICANT YES / NO OR You are a PERSON MAKING A SUBMISSION IN RELATION TO AN APPLICATION YES NO				
Reportable political donations made by person making this declaration or by other relevant persons				
<p>* State below any reportable political donations you have made over the 'relevant period' (see glossary on page 2). If the donation was made by an entity (and not by you as an individual) include the Australian Business Number (ABN).</p> <p>* If you are the applicant of a relevant planning application state below any reportable political donations that you know, or ought reasonably to know, were made by any persons with a financial interest in the planning application, OR</p> <p>* If you are a person making a submission in relation to an application, state below any reportable political donations that you know, or ought reasonably to know, were made by an associate.</p>				
Name of donor (or ABN if an entity)	Donor's residential address or entity's registered address or other official office of the donor	Name of party or person for whose benefit the donation was made	Date donation made	Amount/ value of donation
ABN 18165056360	CENTRAL TERRACE BUILDING 16 ARRIVALS COURT SYDNEY INTERNATIONAL AIRPORT 2020 NSW	NSW NATIONALS (ANN. CONF. PACKAGE)	30/03/17	\$4,500
"	"	FEDERAL ALP BUSINESS EXCHANGE	11/05/17	\$10,000
"	"	LIBERAL PARTY (BRADFELD FEC)	15/05/17	\$100
Please list all reportable political donations—additional space is provided overleaf if required.				
By signing below, I/we hereby declare that all information contained within this statement is accurate at the time of signing.				
Signature(s) and Date  16/10/17				
Name(s) EDWIN (TED) PLUMMER				

From: [REDACTED]
Sent: Sun, 15 Oct 2017 22:20:20 +0000
To: [REDACTED]
Subject: FW: Submission Details for company Sydney Airport (org_comments)
Attachments: 227930_171016 Submission from Sydney Airport_FINAL_2017Oct16_0917.pdf,
 227930_171016 Submission from Sydney Airport_FINAL_Political donations disclosure
 statement_2017Oct16_0917.pdf

From: system@accelo.com On Behalf Of Edwin Plummer
Sent: Monday, 16 October 2017 9:18:22 AM (UTC+10:00) Canberra, Melbourne, Sydney
To: [REDACTED]
Subject: Submission Details for company Sydney Airport (org_comments)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: yes

Name: Edwin Plummer
 Organisation: Sydney Airport (Head of Government and Community Relations)
 Govt. Agency: No
 Email:

Address:

Sydney International Airport, NSW
 2020

Content:

Please ignore submission lodged 10 at around 9:05am, it included the wrong attachment. This is the correct submission

Submission: Online Submission from company Sydney Airport (org_comments)
https://majorprojects.accelo.com/?action=view_activity&id=227930

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

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

16 October 2017

Director Transport Assessments
Planning Services
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Sir/Madam

Thank you for the opportunity to comment on the draft environment impact statement for the proposed M4-M5 Link, which is part of the WestConnex project (the draft EIS).

Our comments on the draft EIS are limited to those aspects of the proposed link that are directly relevant to Sydney Airport.

1. Linking Sydney Airport to Sydney's overall motorway network

Airports are significant and growing contributors to jobs, economic development, national productivity and social connectivity.

Sydney Airport contributes \$30.8 billion in economic activity a year, equivalent to 6.4 per cent of the NSW economy. Sydney Airport is also a major employer in NSW, generating more than 306,700 direct and indirect jobs, equivalent to 8.9 per cent of NSW employment. Some 29,000 of these jobs are at the airport itself.

Sydney Airport also handles around \$36 billion worth of air freight every year which represents 47 per cent of Australia's total.

The draft EIS recognises the economic importance of Sydney Airport which, of course, we support.

Sydney Airport serves around 115,000 airline passengers every day. When added to the 29,000 people who work at the airport and those who visit the airport to greet or farewell passengers, it is estimated that around 160,000 people need to use ground transport of one mode or another to travel to or from Sydney Airport every day. Most of these trips coincide with Sydney's existing commuter peak periods.

Ensuring airline passengers, airport workers, visitors and air freight can get to and from Sydney Airport efficiently and in a timely manner is vitally important to the economy and will be increasingly so as aviation activity continues to grow.

To facilitate this, Sydney Airport works with governments and other stakeholders to enable and facilitate a range of reliable, sustainable, cost effective and efficient ground transport options, including motorways.

2. Sydney Gateway

Creating a direct linkage between Sydney Airport and Port Botany and Sydney's overall motorway network is vitally important.

The proposed Sydney Gateway will deliver this outcome and reduce travel times to the airport and port from many parts of Sydney, particularly Western Sydney. Sydney Gateway is identified as a related project in the draft EIS. It is intended to be a high capacity connection between the St Peters interchange (which is currently under construction as part of the new M5 project) and the Sydney Airport and Port Botany precinct. Sydney Airport supports in principle this connection as it will ensure the airport and port precinct is linked directly to Sydney's motorway network.

As Sydney Gateway is a separate project to the proposed M4-M5 link, it will be subject to separate environmental assessment and approvals processes. Sydney Airport will contribute to these processes as and when they occur.

3. Ventilation outlets

Three ventilation facilities for the tunnel are proposed:

- the Iron Cove Link ventilation facility at Rozelle;
- the Rozelle ventilation facility at Rozelle; and
- the Campbell Road ventilation facility within the St Peters interchange.

As section 2.4.2 of the draft EIS correctly points out, these facilities must be assessed under the *Airports Act 1996* (the Act) and the *Airports (Protection of Airspace) Regulations* (the Regulations) to determine whether or not they are 'controlled activities'. Such activities are defined in section 182(1) of the Act and include activities that result in turbulence, including from exhaust plumes from ventilation facilities such as those proposed here.

If the velocity of gases being vented from these outlets exceeds 4.3 m/s at the lowest of Sydney Airport's prescribed airspace surfaces, it is a controlled activity under the Act and so requires the approval of the Commonwealth Government.

As the draft EIS indicates, the ventilation outlets have been designed to satisfy requirements set by the Commonwealth's Department of Infrastructure and Regional Development (DIRD).

NSW Roads and Maritime Services (RMS) has already submitted relevant controlled activity applications for consideration. Sydney Airport appreciates the detailed consultation undertaken by RMS while preparing these applications. This process occurs separately to consideration of the draft EIS. DIRD is the consent authority for such applications, though we expect CASA's opinion on aviation safety will obviously be vitally important in the decision-making process.

4. Lighting during construction

Section 25.1.4 of the draft EIS mentions that the Civil Aviation Safety Authority (CASA) regulates ground lighting where it has the potential to impact airport operations, such as by causing confusion or distraction from glare to pilots in the air.

Sydney Airport supports the commitment in the draft EIS that lighting during construction would adhere to established guidelines, including CASA's *Lighting in the vicinity of aerodromes*, Chapter 12 of the *Sydney Airport Master Plan 2033* and *National Airport Safeguarding Framework Guideline E: Managing the risk of distractions to pilots from lighting in the vicinity of airports* in relation to the location and permitted intensities of ground lights within a six-kilometre radius of Sydney Airport.

5. Improved public transport

Page 8-102 of the draft EIS highlights the need for government to deliver improved public transport services to and from Sydney Airport (see pp 8-101 and 102).

As the draft EIS notes, the NSW Government's *Sydney's Bus Future* identifies a number of short and longer-term priorities for existing and new bus services across Sydney generally, and to and from Sydney Airport specifically. These are:

- Chatswood to Sydney Airport via Sydney CBD and Botany Road (new route replacing the existing M20 service);
- Bondi Junction to Miranda via Sydney Airport (new route); and
- Bondi Junction to Burwood via Sydney Airport (existing route 400)

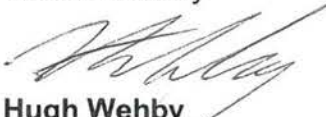
Sydney Airport supports these new bus routes and urges the government to introduce them as soon as practicable. Of these, the proposed new bus route connecting the airport to Miranda is the most important because more than a third of the airport's 29,000 workers live in the St George – Sutherland area and there is currently no direct public transport connection from that area to the airport.

With respect to rail, the draft EIS notes that the NSW Government's *Sydney's Rail Future* highlights the need for additional trains on the Airport & East Hills (T2) line which includes the two train stations at Sydney Airport's International and Domestic terminals.

Sydney Airport supports such additional train services and welcomed the NSW Government's recent announcement to provide additional train services. NSW Transport Minister Andrew Constance announced that the NSW Government will provide an additional 200 airport train services per week by the end of 2017. This will result in average waiting times for a train to or from Central Station and the Domestic and International stations of approximately 7.5 minutes during off-peak hours on weekdays and throughout weekends, and a reduction from 30 minutes down to 15 minutes late at night.

If you would like any further information, please feel free to contact Sydney Airport's Head of Government and Community Relations, Mr Ted Plummer, on (02) 9667 6182 or at ted.plummer@syd.com.au.

Yours sincerely



Hugh Wehby
Chief Operating Officer

Political donations disclosure statement



NSW GOVERNMENT
Department of Planning

Office use only:

Date received: ____/____/____

Planning application no. _____

This form may be used to make a political donations disclosure under section 147(3) of the *Environmental Planning and Assessment Act 1979* for applications or public submissions to the Minister or the Director-General.

Please read the following information before filling out the Disclosure Statement on pages 3 and 4 of this form. Also refer to the 'Glossary of terms' provided overleaf (for definitions of terms in *italics* below). Once completed, please attach the completed declaration to your planning application or submission.

Explanatory information

Making a planning application or a public submission to the Minister or the Director-General

Under section 147(3) of the Environmental Planning and Assessment Act 1979 ('the Act') a person:

- (a) who makes a *relevant planning application* to the Minister or the Director-General is required to disclose all *reportable political donations* (if any) made within the *relevant period* to anyone by any *person with a financial interest* in the application, or
- (b) who makes a *relevant public submission* to the Minister or the Director-General in relation to the application is required to disclose all *reportable political donations* (if any) made within the *relevant period* to anyone by the person making the submission or any *associate of that person*.

How and when do you make a disclosure?

The disclosure to the Minister or the Director-General of a *reportable political donation* under section 147 of the Act is to be made:

- (a) in, or in a statement accompanying, the relevant planning application or submission if the donation is made before the application or submission is made, or
- (b) if the donation is made afterwards, in a statement of the person to whom the relevant planning application or submission was made within 7 days after the donation is made.

What information needs to be included in a disclosure?

The information requirements of a disclosure of reportable political donations are outlined in section 147(9) of the Act.

Pages 3 and 4 of this document include a Disclosure Statement Template which outlines the information requirements for disclosures to the Minister or to the Director-General of the Department of Planning.

Note: A separate Disclosure Statement Template is available for disclosures to councils.

Warning: A person is guilty of an offence under section 125 of the *Environmental Planning and Assessment Act 1979* in connection with the obligations under section 147 only if the person fails to make a disclosure of a political donation or gift in accordance with section 147 that the person knows, or ought reasonably to know, was made and is required to be disclosed under section 147.

The maximum penalty for any such offence is the maximum penalty under Part 6 of the *Election Funding and Disclosures Act 1981* for making a false statement in a declaration of disclosures lodged under that Part.

Note: The maximum penalty is currently 200 penalty units (currently \$22,000) or imprisonment for 12 months, or both.

Glossary of terms (under section 147 of the *Environmental Planning and Assessment Act 1979*)

gift means a gift within the meaning of Part 6 of the *Election Funding and Disclosures Act 1981*. Note. A gift includes a gift of money or the provision of any other valuable thing or service for no consideration or inadequate consideration.

Note: Under section 84(1) of the *Election Funding and Disclosures Act 1981* gift is defined as follows:

gift means any disposition of property made by a person to another person, otherwise than by will, being a disposition made without consideration in money or money's worth or with inadequate consideration, and includes the provision of a service (other than volunteer labour) for no consideration or for inadequate consideration.

local councillor means a councillor (including the mayor) of the council of a local government area.

relevant planning application means:

- a) a formal request to the Minister, a council or the Director-General to initiate the making of an environmental planning instrument or development control plan in relation to development on a particular site, or
- b) a formal request to the Minister or the Director-General for development on a particular site to be made State significant development or declared a project to which Part 3A applies, or
- c) an application for approval of a concept plan or project under Part 3A (or for the modification of a concept plan or of the approval for a project), or
- d) an application for development consent under Part 4 (or for the modification of a development consent), or
- e) any other application or request under or for the purposes of this Act that is prescribed by the regulations as a relevant planning application, but does not include:
 - f) an application for (or for the modification of) a complying development certificate, or
 - g) an application or request made by a public authority on its own behalf or made on behalf of a public authority, or
 - h) any other application or request that is excluded from this definition by the regulations.

relevant period is the period commencing 2 years before the application or submission is made and ending when the application is determined.

relevant public submission means a written submission made by a person objecting to or supporting a relevant planning application or any development that would be authorised by the granting of the application.

reportable political donation means a reportable political donation within the meaning of Part 6 of the *Election Funding and Disclosures Act 1981* that is required to be disclosed under that Part. Note. Reportable political donations include those of or above \$1,000.

Note: Under section 86 of the *Election Funding and Disclosures Act 1981* reportable political donation is defined as follows:

86 Meaning of "reportable political donation"

- (1) For the purposes of this Act, a reportable political donation is:
 - (a) in the case of disclosures under this Part by a party, elected member, group or candidate—a political donation of or exceeding \$1,000 made to or for the benefit of the party, elected member, group or candidate, or
 - (b) in the case of disclosures under this Part by a major political donor—a political donation of or exceeding \$1,000:
 - (i) made by the major political donor to or for the benefit of a party, elected member, group or candidate, or
 - (ii) made to the major political donor.
- (2) A political donation of less than an amount specified in subsection (1) made by an entity or other person is to be treated as a reportable political donation if that and other separate political donations made by that entity or other person to the same party, elected member, group, candidate or person within the same financial year (ending 30 June) would, if aggregated, constitute a reportable political donation under subsection (1).
- (3) A political donation of less than an amount specified in subsection (1) made by an entity or other person to a party is to be treated as a reportable political donation if that and other separate political donations made by that entity or person to an associated party within the same financial year (ending 30 June) would, if aggregated, constitute a reportable political donation under subsection (1). This subsection does not apply in connection with disclosures of political donations by parties.
- (4) For the purposes of subsection (3), parties are associated parties if endorsed candidates of both parties were included in the same group in the last periodic Council election or are to be included in the same group in the next periodic Council election.

a person has a financial interest in a relevant planning application if:

- a) the person is the applicant or the person on whose behalf the application is made, or
- b) the person is an owner of the site to which the application relates or has entered into an agreement to acquire the site or any part of it, or
- c) the person is associated with a person referred to in paragraph (a) or (b) and is likely to obtain a financial gain if development that would be authorised by the application is authorised or carried out (other than a gain merely as a shareholder in a company listed on a stock exchange), or
- d) the person has any other interest relating to the application, the site or the owner of the site that is prescribed by the regulations.

persons are associated with each other if:

- a) they carry on a business together in connection with the relevant planning application (in the case of the making of any such application) or they carry on a business together that may be affected by the granting of the application (in the case of a relevant planning submission), or
- b) they are related bodies corporate under the *Corporations Act 2001* of the Commonwealth, or
- c) one is a director of a corporation and the other is any such related corporation or a director of any such related corporation, or
- d) they have any other relationship prescribed by the regulations.

Political Donations Disclosure Statement to Minister or the Director-General

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

Disclosure statement details				
Name of person making this disclosure SYDNEY AIRPORT (TED PLUMMER)		Planning application reference (e.g. DA number, planning application title or reference, property address or other description) WESTCONNEX M4-M5 LINK (SSI 16 7485)		
Your interest in the planning application (circle relevant option below)				
You are the APPLICANT YES / NO OR You are a PERSON MAKING A SUBMISSION IN RELATION TO AN APPLICATION YES NO				
Reportable political donations made by person making this declaration or by other relevant persons				
<p>* State below any reportable political donations you have made over the 'relevant period' (see glossary on page 2). If the donation was made by an entity (and not by you as an individual) include the Australian Business Number (ABN).</p> <p>* If you are the applicant of a relevant planning application state below any reportable political donations that you know, or ought reasonably to know, were made by any persons with a financial interest in the planning application, OR</p> <p>* If you are a person making a submission in relation to an application, state below any reportable political donations that you know, or ought reasonably to know, were made by an associate.</p>				
Name of donor (or ABN if an entity)	Donor's residential address or entity's registered address or other official office of the donor	Name of party or person for whose benefit the donation was made	Date donation made	Amount/ value of donation
ABN 18165056360	CENTRAL TERRACE BUILDING 16 ARRIVALS COURT SYDNEY INTERNATIONAL AIRPORT 2020 NSW	NSW NATIONALS (ANN. CONF. PACKAGE)	30/03/17	\$4,500
"	"	FEDERAL ALP BUSINESS EXCHANGE	11/05/17	\$10,000
"	"	LIBERAL PARTY (BRADFELD FEC)	15/05/17	\$100
Please list all reportable political donations—additional space is provided overleaf if required.				
By signing below, I/we hereby declare that all information contained within this statement is accurate at the time of signing.				
Signature(s) and Date Ted Plummer 16/10/17				
Name(s) EDWIN (TED) PLUMMER				

From: [REDACTED]
Sent: Sun, 15 Oct 2017 22:11:52 +0000
To: [REDACTED]
Subject: FW: Submission Details for Jennifer Moore (comments)
Attachments: 227928_WestConnex submission_2017Oct16_0907.pdf

From: system@acelo.com On Behalf Of Jennifer Moore
Sent: Monday, 16 October 2017 9:08:15 AM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for Jennifer Moore (comments)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Jennifer Moore
[REDACTED]

Address:
[REDACTED]

Croydon Park, NSW
2133

Content:

16 October 2017

To Whom it May Concern:

I am writing regarding the M4-M5 Link EIS. I am a parent of children who attend Haberfield Public School. I object to what is being referred to as Option B in the EIS.

Option B would have the construction site 200m from our school where over 650 children attend. The location leads to many concerns for me:

1. Air quality impacts - Since the M4 East construction began the area has already seen an increase in dust. Having a site so close to the school will be dangerous to those who already have health issues such as asthma and could lead to additional children developing issues or becoming ill. The site will also be placed in that path of student and families walking to school who will then be exposed daily to dust and other pollutants.
2. Noise and vibrations - the students at Haberfield spend most of the day at school and will be subject to noise and vibration coming from the construction site as well as the drilling. Some noise will still travel despite the use of acoustic sheds. This could greatly impact the students and their learning with distractions from the noise and vibrations making it difficult to concentrate.
3. Traffic and truck movement - We have already seen a great increase in traffic congestion since the M4 East construction commenced. Parents are struggling to find a parking spot or get to school in a reasonable amount of time as traffic is often banked up down Bland St - the main access road for the school. Construction on the corner of Bland and Parramatta Road will only add to the problem. It also raises safety concerns for the students and families walking to school from the Ashfield side. Bland St is already a very dangerous and with the added truck movement and construction I do worry for everyone's safety, particularly those who walk to school without an adult.
4. Unfiltered ventilation stacks - why? If a stack is going in it needs to be filter as it is in the best interest for the children's health.

What I am requesting happen regardless of which option is chosen:

1. Air conditioning in the classrooms - this will allow the classes to close their windows when noise or dust activity are at their worst
2. Glazing on windows - this will help with noise and allow students to concentrate on their work
3. Lollypop person at the Bland St crosswalk near the school - we have applied for this many times and have been rejected each time because we do not meet the quota for students travelling on their own. Parents are too afraid to let children cross on their own as we have had too many near hits. I have personally almost been hit on numerous occasions. The last time I had to quickly grab my children and hold them back while someone flew through the crossing. We should not be expected to put our children at risk just to reach the quota before something gets done. Not only will this help protect the children but it could also assist with some traffic/parking issues as parents will feel they can drop their kids off and allow them to cross with the lollypop person rather than driving in circles looking for a parking spot.

Kind regards,
Jennifer Moore

Submission: Online Submission from Jennifer Moore (comments)

https://majorprojects.accelo.com/?action=view_activity&id=227928

Submission for Job: #7485 WestConnex M4-M5 Link

https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

16 October 2017

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Kind regards,

Jennifer Moore

From: [REDACTED]
Sent: Sun, 15 Oct 2017 22:32:14 +0000
To: [REDACTED]
Subject: FW: Submission Details for Jack Sciara (object)
Attachments: 227932_EIS submission Jack Sciara_2017Oct16_0927.pdf

From: system@accelo.com On Behalf Of Jack Sciara
Sent: Monday, 16 October 2017 9:28:15 AM (UTC+10:00) Canberra, Melbourne, Sydney
[REDACTED]
Subject: Submission Details for Jack Sciara (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Jack Sciara
[REDACTED]

Address:
[REDACTED]

Five Dock, NSW
2046

Content:
See attached

[REDACTED]
Submission: Online Submission from Jack Sciara (object)
https://majorprojects.accelo.com/?action=view_activity&id=227932

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

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

13th October 2017

Submission to WestConnex New M4/M5 EIS, project number SSI 16_7485

Attn: Director, Transport Assessments

Planning Services

Department of Planning & Environment

GPO Box 39

SYDNEY NSW 2001

RE: SUBMISSION OF OBJECTION TO WESTCONNEX M4/M5 LINK EIS

Dear Director,

I submit this objection on the M4-M5 Link Project (the subject of the EIS). I contend that NSW Planning must require the Proponent – the Roads & Maritime Services (RMS) to properly and adequately address the impacts set out below which are not adequately addressed in this EIS before any consideration is given for its approval. I therefore object to the M4-M5 Link proposal and urge the Secretary of Planning to advise the Minister to refuse the application on the grounds below:

1. The EIS is based on an indicative design only and has insufficient detail for the impacts of the proposed design, construction and operation of the project to be properly assessed and addressed by the public, local, State and Commonwealth Government agencies, infrastructure and service providers, special interest groups, affected land owners, businesses as well as the Department of Planning. The EIS does not sufficiently address these uncertainties and how these will be resolved in the next stages of the project.

Further, the public, agencies and key stakeholders impacted by the proposal will have no opportunity to further comment on the Preferred Infrastructure Report which will form the basis of the approval conditions. This means that key interest groups and affected residents will have limited say in the management of the impacts and or deficiencies identified in the EIS. The EIS needs to provide an opportunity for all interest groups directly affected by the project to meaningfully input into this report and the approval conditions now – given the project is one of the largest infrastructure projects in Australian history – at an estimated \$7.8 billion.

The EIS should be refused until the project uncertainties such as design, construction and operation methodologies are resolved or an additional layer of planning protection is provided via the Preferred Infrastructure Reporting so that there can be no question of probity or governance around approval of this project.

2. I object to the EIS on the basis that the “spaghetti junction” design for the Rozelle Interchange provides no certainty for its delivery and that it is virtually certain that the yet to

be decided design and construct contractor of the project will want to change it. Sydney Motorway Corporation (SMC) – the company delivering WestConnex has not been able to identify any other similar underground interchange project in the world or find a construction company to build it (SMH: State rejects only bidder for construction of WestConnex spaghetti junction. October 11 2017). <http://www.smh.com.au/nsw/state-rejects-only-bidder-for-construction-of-westconnex-spaghetti-junction-20171011-gyysn9.html>

The indicative design has been described as “bizarre and virtually unbuildable” by one public commentator with engineering qualifications. It is apparent that the NSW Government has yet to resolve how to build this complex web of exit and entry tunnels as much as 65 metres deep. This EIS should be rejected because the uncertainty with such a design concept without evidence that it could actually be constructed provides no guarantee that the project will proceed or be significantly amended. The process for approval for Stage 1 (M4 Motorway) and Stage 2 (M5 to St Peters) should be followed whereby design and construction contractors were appointed early and had direct input into the design development, EIS preparation and construction planning and there is no reason why the approval process for Stage 3 M4-M5 Link should be any different to Stages 1 or 2.

3. The EIS should be refused on the basis that there has been inadequate public consultation. 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.” It appears clear that the NSW Government’s sole intent with the lack of public consultation between the Concept Design and EIS is to clear the pathway for the sale of the SMC to the private sector, removing from the government responsibility, oversight and control into the final design, cost and implementation of the M4-M5 Link. It has been publicly reported that the Government is “ramping” up efforts for the sale of SMC and as a result tender bids are to be submitted by November 2017 (concurrently with the Departments assessment of the EIS) with the successful consortia (perhaps Transurban or some other international toll operator) awarded control of SMC by mid 2018. There is no doubt that the NSW Government is relying on the sale of 51% of SMC to shore up its budget ahead of the 2019 NSW State election. Scrutiny of the EIS by the Department, stakeholders, investors and the public should not be compromised as a result of political expediency and budgetary pressures.
4. The EIS should be refused on the basis of its inconsistencies and lack of planning integration with previously announced urban renewal strategies such as the **Bays Precinct** plans. In 2016 the Minister for Planning announced the Bays Precinct as an area of State Significance and the NSW Government said it would prioritise the rezoning and urban renewal of land within the Precinct. In July 2017, the NSW Premier Gladys Berejiklian announced a housing affordability package, declaring a number of additional Priority Precincts and Priority Growth areas. The Bays Precinct was one of those Priority Growth areas identified in the July 2017 announcement. The M4-M5 Link Project proposes to use the 10 hectares of land within the Rozelle Rail Yards – a sub precinct identified by the NSW Government and Urban Growth NSW for urban renewal providing mixed uses of housing, employment and open space – for

green space with tunnelling below the surface. Urban Growth NSW according to their website are continuing to investigate the area as a long term destination for an urban renewal corridor to deliver much needed housing (including affordable housing), employment and open space (in line with the key narratives of the Greater Sydney Commission and the Draft District Plans). See <http://thebayssydney.nsw.gov.au/destinations/rozelle-rail-yards/>

An objection is raised on the basis that the planned 10 hectares of open space announced as part of the M4-M5 Link Project is likely to circumvent plans for the urban renewal of lands and their economic transformation and re-use for delivery of housing, employment and open space in the Rozelle Rail Yards – as had been proposed – putting even more pressure on the overheated Sydney housing market. The project further gives no certainty to the various planning strategies by making statements such as “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”. This statement is incredibly confusing but yet is included multiple times in the EIS and provides enormous uncertainty for planners, local councils, the community, the Department, private land owners as well as other key stakeholders who are currently working towards developing Local Environmental Plans (LEPs) and Development Control Plans (DCPs) in line with the recommendations in the Greater Sydney Commission and Draft District Plans. The fact that parts of the project are not expected to be delivered or finalised until 2022 and 2023 means that it compromises any ability these agencies or stakeholders have to plan, and or deliver the much needed 5,700 new dwellings for the Inner West LGA by 2021 – as required in the District Plans. The EIS should be rejected until the Department and RMS have finalised plans for:

- i) Appointment of a final design and construct contractor
- ii) Final plans for construction of the M4-M5 Link Project including landscaping requirements
- iii) Identified finally any conflict between planning strategies as well as residual lands not required for the project so as to give certainty to planners, local councils and the Department to meet its objectives for future planning strategies.

The SEARs requirements issued by the Department for this EIS state that any conflicting information (such as construction of the project and urban renewal of land) must be avoided. The EIS should be rejected until such time as this conflict is resolved.

5. 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 when Stage 3 was completed (if at all). It states that Stage 3 would do nothing to improve traffic congestion in the area and in fact it will worsen the problem. Many of these areas are already congested at peak times. Relying on the delivery of other road infrastructure projects such as the future Western Harbour Tunnel, Beaches Link, Sydney Gateway and F6 extension and admitting that the current M4-M5 Link would see an increase

in traffic generation and bottlenecks in the immediate future without the certainty of these future project being realised is a reason for refusal of this EIS.

6. The EIS should be refused on the basis that the traffic data relied upon are not reliable and have been described as “overly optimistic”. Only last week Citi financial analysts in a report to their investors were of the view that the traffic predictions contained in the EIS were unlikely to be achievable. An EIS based on inaccurate traffic data analysis should not be approved.

AECOM, the company responsible for this EIS, has a well-documented record of wrongly predicting traffic data. 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) <http://www.smh.com.au/nsw/pressure-builds-on-state-government-to-sweeten-westconnex-sale-20171005-gyur5w.html>.

The proponent should update the traffic modelling data to reflect the more realistic project traffic volumes so that a proper assessment of the EIS by the community and key stakeholders including infrastructure and service providers can be undertaken.

7. The economic justification for this project is the approval and construction of further toll roads. Throughout the EIS there are references to future projects such as the F6 extension and Western Harbour Tunnel and 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 totally upon them being built - that is, traffic will lessen once they are built. However, there is no certainty this will occur. Any references to toll roads or future road infrastructure not yet delivered, in the context of impacts from this project, need therefore to be assessed and then separately disregarded to show the true Benefit Cost Ratios (BCR) and the proponent should be asked to recalculate these for the project together with an assessment of alternative transportation methods such as future rail (such as the Sydney Metro), bus and light rail.

The EIS should not be approved until a thorough assessment of this has been completed.

8. I object to this EIS on the basis that it proposes and promotes poor air quality through the use of unfiltered ventilation systems in both the Rozelle Rail Yards and on Victoria Road. I am particularly concerned that schools are located near the locations identified for such unfiltered systems. The EIS states, there are at least 5 schools that will be in the orbit of these unfiltered plumes. 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. As a result, the EIS should not be approved or conditions of consent should be imposed requiring the use of filtered ventilation systems.
9. I further object to the design of the ventilation stacks which are proposed in the concept design to be around 35 metres in height. Given the EIS is a concept design, there is no

guarantee that the ventilation stacks won't be much higher. As a result of these heights and the plumes of extracted unfiltered exhaust fumes the EIS proposes planning controls to ensure future developments are not adversely impacted by emissions from the ventilation outlets. Given the Government has previously committed to the Bays Precinct as a Priority Growth area and the need to deliver much needed housing to the Inner West LGA, I object to the EIS on the basis that certainty in the design is needed to ensure future densities can be delivered for the area.

10. I object to the use of Darley Rd, Leichhardt as a dive site. The site cannot accommodate the projected traffic movements without jeopardising the road network. Darley Road is a critical access road for the residents of Leichhardt and the inner west to access and cross the City West Link. As the EIS acknowledges, this route is already congested at peak hours. The intersection at James Street and the City West link already has queues at the traffic lights. The only other option for commuters to access the city West Link is to use Norton Street, a two-lane largely commercial strip which is already at capacity. The addition of hundreds of trucks and contractor vehicles will result in traffic grinding to a halt and traffic chaos at this critical juncture with commuter travel times drastically increased.
11. I object to the compulsory acquisition of industrial and commercial properties along Lilyfield Road, Rozelle being the Gillespie Crane, Swadling Timberyard and Desane Group properties. These properties had each engaged with the Department of Planning separately lodging planning proposals for the delivery of mixed use developments in line with the planning of the Bays Precinct. These respective developments, if approved would have delivered much needed housing to the Inner West LGA including at least 10-15% affordable housing component. These properties were then compulsory acquired at below market offers by the proponent for the purposes of "light vehicle parking" according to the EIS and later to be used to assist the Government to deliver 10 hectares of green space. I object to the requirement of privately held properties being acquired, at multiples of millions of dollars for the delivery of staff parking and future green space. Apart from the businesses being long standing operators in the area, the use of Government owned land in the vicinity of Lilyfield Road (including the Rozelle Rail Yards, White Bay and Glebe Island) would be a far more efficient and economic use of tax payer money. The SEARS requirements state under Socio-economic, Land Use and Property: "passively landscaped areas should not be the default use for residual land". Yet the concept design in this EIS shows acquired land along Lilyfield Road Rozelle being used for this very purpose (passive landscape areas). This is not an efficient and economic use of the land and is contrary to the planning that has been underway for several years for the area by both the Department and the individual land owners.

A cynic may conclude that the Lilyfield Road properties were acquired by the proponent not for the purposes of passive landscaping but rather for "value capture" purposes— particularly as it continues to consult closely with UrbanGrowth NSW for the delivery of key components of the Bays Precinct Urban Transformation Plan according to the EIS, details of which are yet to be finalised. The EIS should not be approved until the NSW Government reveals the true discussions the proponent RMS has been having with Urban Growth NSW and the

Department on the delivery and urban renewal of residual lands within the Rozelle Rail Yards project footprint as part of the Bays Precinct Transformation Plan and why the proponent is acquiring privately owned property for the purposes of passive landscaping and not providing residual lands that are designed to positively contribute to additional community uses, public recreation uses as well as affordable and social housing as per the SEARs requirements.

Overall, 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 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 a glossy brochure, light on detail, which minimise the negative aspects of a project and state that every impact will be managed by a 'plan' or future consultation that never eventuates.

The high number of residents in Haberfield, Lilyfield, Rozelle, Annandale and Leichhardt who will be impacted by this enormous and complex infrastructure project requires much more attention by the Department and the NSW Government as opposed to political expediency for upcoming State elections.

I urge the Secretary of Planning to advise the Minister to reject this EIS until the inconsistencies and details for the project are finalised. You are entitled to 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.

Kind Regards

Jack Sciara

13 Rodd Road Five Dock NSW 2046

From: [REDACTED]
Sent: Sun, 15 Oct 2017 22:36:50 +0000
To: [REDACTED]
Subject: FW: Submission Details for Vanessa Knight (object)
Attachments: 227940_WestConnex Stage 3 EIS_ Objection_ Vanessa Knight
 20171016_2017Oct16_0935.pdf

From: system@accelo.com On Behalf Of Vanessa Knight
Sent: Monday, 16 October 2017 9:36:08 AM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for Vanessa Knight (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Vanessa Knight
 [REDACTED]

Address:
 [REDACTED]

Alexandria, NSW
 2015

Content:

I strongly object to the WestConnex Stage 3 EIS. The reasons for my objection is that the whole project is fundamentally flawed, but I have detailed my specific objections in the document I have submitted.

[REDACTED]
 Submission: Online Submission from Vanessa Knight (object)
https://majorprojects.accelo.com/?action=view_activity&id=227940

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

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

WestConnex Stage 3 EIS (M4/M5 Link)

Objection

Summary

As a proud resident of New South Wales, I strongly **object** to the WestConnex M4-M5 Link for the following reasons:

- It fails to meet the primary objectives of providing a direct motorway connection between Western Sydney and Sydney Airport and Port. This is a fundamental failure of the entire project.
- The EIS should either include the Sydney Airport Gateway and its costs, or else it should exclude the Sydney Airport Gateway and its benefits. To evaluate benefits but not the concurrent costs is a catastrophic failure, fails the probity test and calls the entire project into question.
- There is no strategic justification for the project.
- No feasible alternatives have been developed or assessed.
- There are severe impacts on the community of Alexandria where I live and our neighbouring suburbs – this will have huge impact now and for future generations.
- 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 – including our suburbs. In addition, local surface roads will be widened and traffic volumes will increase.
- There is no alignment with the NSW Government's priorities and policies for an integrated transport solution to Sydney's growth challenges – this is a fundamental failure of the Government's planning process
- The EIS forecasts that the Project will have disastrous effects on bus travel time and reliability.

Alexandria is already subjected to high levels of congestion due to rapid over-development and huge increases in population – and there is more to come with the development of the Ashmore Estate.

The EIS shows that WestConnex is not the solution to this growing problem– on the contrary, it will only worsen it. Moreover, if Alexandria and neighbouring suburbs are congested, the entire project will fail, as this is the end-point for the M4-M5 link.

Strategic Alternatives

The Secretary's Environmental Assessment Requirements (SEARS) require analysis of feasible alternatives to the project. But no feasible alternatives have been developed and no objective, evidence-based analysis of alternatives has been undertaken.

- Section 4.4 of the EIS purports to cover *Strategic Alternatives*, but does little more than offer a discussion of why an alternative was not pursued.

- Better use of existing road infrastructure has not been analysed as a feasible alternative. The EIS only refers to existing RMS programs.
- At a minimum, the EIS should carry out transport modelling and economic analysis to assess: improvements to the existing arterial road network (Strategic Alternative 1), alternative transport modes (Strategic Alternative 2) and travel demand management (Strategic Alternative 3)
- Given the disastrous record of similar tollway projects in the past, there should also be a discussion as to how modelling and forecasting practices have been improved
- The consideration of alternatives should also incorporate best practices from other leading global cities

Cost Benefit

The EIS does not estimate either the incremental benefit of each alternative, or the cumulative benefit of all of the alternatives.

The EIS does not present a cost benefit analysis. Instead, it relies on cost benefit modelling allegedly contained in the 2015 *WestConnex Updated Strategic Business Case*:

“The benefit cost ratio for the project alone identified in the WestConnex Updated Strategic Business Case is 2.38:1 when the wider economic benefits of the project are not taken into consideration. When the wider economic benefits are considered, the benefit cost ratio is 2.94:1.” (3-19)

These figures are not to be found in the *WestConnex Updated Strategic Business Case*. The documents contain only a claimed BCR of 1.71 (higher with WEB) for the whole WestConnex and no breakdown of the benefits attributable to each stage.

If the figure of 2.94:1 were an accurate reporting of the benefit attributable to Stage 3, then this would indicate almost the entire benefit claimed for the project is approximately the same as the benefit attributed to Stage 3, meaning that Stages 1 and 2 individually have negligible benefit.

This should have been disclosed when those Stages were assessed.

Since the 2015 business case, it has been revealed that the benefits of WestConnex were overstated and that costs were underestimated.

(See, for example, <http://www.smh.com.au/nsw/pressure-builds-on-state-government-to-sweeten-westconnex-sale-20171005-gyur5w.html> and <https://thewest.com.au/politics/docs-reveal-another-westconnex-blowout-ng-s-1758300>.)

This means that the benefits of Stage 3 are actually lower than 2.94, and that the benefits of Stage 1 and Stage 2 are also lower - less than the costs attributable to each stage.

The *WestConnex Updated Strategic Business Case* says that “[t]he significant jump in benefits in the year 2023, is representative of the increased scale of benefits being ‘unlocked’ by the opening of the M4-M5 tunnel link (Stage 3).” (KPMG-43).

However, the *WestConnex Updated Strategic Business Case* was based on the assumption that the Sydney Gateway would be completed as part of Stage 2 (KPMG-19):

WestConnex Stage 2	<p>Stage 2 involves a New M5 to duplicate the existing M5. Key components include:</p> <ul style="list-style-type: none">• Upgrade to the existing on and off-ramps at the King Georges Road interchange.• Widening of the existing M5 East surface road to four lanes in each direction, from King Georges Road, Beverly Hills, to just west of Kingsgrove Road, Kingsgrove.• Western tunnel portal located on the M5 East, just west of Kingsgrove Road. Tunnel in close proximity to existing M5 East, before heading north to St Peters.• Eastern portal south of Campbell Road, St Peters, creating the 'St Peters Interchange'. Once Stage 3 is built, St Peters Interchange will operate as on and off-ramps for the integrated motorway tunnel.• Tunnel stubs to facilitate underground connection with Stage 3.• Surface road works for roads in the vicinity of the St Peters Interchange, including:<ul style="list-style-type: none">• 'Sydney Gateway' connecting St Peter Interchange to Airport Drive, near Sydney Airport.• Upgrade of the King George Rd Interchange has already commenced.• Construction of the new M5 tunnel is expected to commence in 2016.
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Figure 2: WestConnex Stage 2 includes Sydney Gateway (Source: *WestConnex Updated Strategic Business Case*)

Therefore, it is safe to assuming the ratio of 2.94:1 (which already needs to be reduced to allow for cost overruns and over-optimistic estimation of benefits) is based not just on Stage 3 being completed, but also on the Sydney Airport Gateway being complete.

The EIS is also explicit that its benefits are dependent on the Sydney Gateway, also known as Airport Link: "For the purposes of this EIS, the Sydney Gateway project is assumed to be completed and open to traffic in 2023." (4-4).

The Premier has confirmed that the Gateway is "not part of the project", and never was. (<https://thewest.com.au/politics/docs-reveal-another-westconnex-blowout-ng-s-1758300>.)

This does introduce the question of why the Business Case was based on the assumption that the Gateway was part of the project.

But more importantly, it raises the question of how much of the (supposed) benefit ratio of 29.4:1 is dependent on the Sydney Gateway.

The EIS for Stage 3 reveals that the benefits of Stages 1 and 2 are negligible, less than the cost of construction. It also suggests that the benefits of Stage 3, alone, are negligible.

To evaluate benefits but **not** the concurrent costs is a **catastrophic failure** and calls all stages of the WestConnex project into question.

Traffic and transport modelling

There is no statement on the level of accuracy and reliability of the traffic modelling process. This is a major deficiency and is contrary to the SEARS.

Properly evaluated traffic modelling is essential due to overoptimistic traffic predictions in other recent toll road projects such as the Cross City Tunnel and Lane Cove Tunnel. Reliance on the strategic traffic model (WTRM) alone amounts to maladministration. The model assumes that routes in the network have the capacity to carry the forecast traffic. However, the heavily congested roads in inner city areas such as Alexandria do not. The WTRM results should therefore have been accompanied by a mesoscopic model. As is, it relies on implausible traffic volumes that exceed the physical capacity of the road links and intersections at numerous key locations.

The modelling process incorporates a non-standard definition of induced traffic (p.45 of Appendix H), as well as a very low percentage of induced demand (0.3%) in light of actual

experience. The Value of Travel Time is unpublished. All these assumptions need to be publicly released and subjected to rigorous independent assessment.

Projected traffic volumes

The St Peters / Sydney Park Interchange will overwhelm the Mascot road network. As a result traffic levels were reduced to fit the modelling.

In order to make the model work, traffic that exceeds the free flow capacity of the network was reassigned to hours outside of the peak – i.e. the model assumes people shift the time they travel. However, the potential of shifting journey times to reduce overall traffic demand is not considered.

The modelling has thousands of unreleased cars at key locations; i.e. in reality those unreleased vehicles would result in vehicle queues and/or network failure.

The key intersection performance tables in App H (p.258) 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

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

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

The congestion in the St Peters network will also make the local bus network dysfunctional. Bus schedules in this area are already unreliable due to congestion; the EIS shows this will only worsen.

Impacts on surrounding road network and required upgrades not provided

The EIS notes that an 'Operational Traffic Performance Review' will be undertaken at 12 months and five years after the M4-M5 Link is open to consider the need for "post-opening mitigation measures" (Page 223, Chapter 9.8, Appendix H).

We object to this approach as it is contrary to the requirements of the EIS process.

The nature of these "post-opening mitigation measures" are not specified and their impacts could be significant, including: intersection and road widening (and associated property loss), banning parking in local centres, removal of trees, footpaths and cycling facilities.

The residents of Alexandria have a reasonable expectation to understand whether such impacts form part of the project and they should be detailed in the EIS. They should not be left to a "wait and see" approach. Not only a proper analysis of demand, but also of traffic dispersion should be provided for connecting roads up to three kilometres from every exit and entry portal and the capacity of those roads analysed.

The cost of any such "network integration" works should very clearly be attributed to the project cost, and should not impact on the available RMS budget for the State road network normal maintenance and improvement budget.

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.

Air quality

Scientists have found that there is no safe level of air pollution. This is not only a personal tragedy for those directly affected, but also represents an increased burden on our health system. A thorough cost-benefit analysis that takes into account the health effects due to increased exposure is required.

Concentrations of some pollutants PM_{2.5} and PM₁₀ are already near the current standard and in excess of proposed standards (p9-81, p9-93). 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.

The EIS states that the impact on regional air quality is minimal and thus concludes that the project's impact on ozone is negligible. Ozone is a major pollutant, affecting Western Sydney as well. Previous environment departments have spoken about the need for an eight-hour standard concentration and goal for ozone (DECCEW, 2010, State of Knowledge: Ozone). OEH needs to provide information about the value of this standard and on the impact of new motorways on that level.

The EIS should not be approved until an independent scientifically qualified reviewer has analysed the stated air quality outcomes and identified any deficits

The St Peters interchange is of particular concern to the residents of Alexandria.

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

Carbon pollution

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

The assessment states that there will be a net increase in GHG emissions in 2023 under the 'with project' scenario, however under the 2023 'cumulative' scenario, there will be a net decrease in emissions (page 22-15). However, as the 'cumulative' scenario includes the Sydney Gateway and Western Harbor Tunnel projects, which are not yet confirmed to proceed, 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 an omission, 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.

Community complaints during construction The EIS states that a Construction Traffic and Access Management Plan (CTAMP) *"would be developed in consultation with local Councils and stakeholders associated with public facilities adjacent to project site"*.

However, the record to date is that communities – including residents in Alexandria – have not had their complaints fairly dealt with. When issues are raised, Sydney Motorway Corporation and Roads and Maritime Services each deny responsibility and blame each other for a lack of action.

Moreover, undertakings which these organisations enter into are not necessarily honoured. As a result the community has no effective avenue for complaints to be resolved. A better system needs to be devised for this project to safeguard communities and preserve our democratic rights. This has to be guaranteed before project approval.

Sydney Gateway/Sydney Airport

The EIS states that the project will improve connection to the Sydney Airport and Port Botany. It will not.

Without the Sydney Gateway, which is not part of this proposal, the traffic figures in the EIS show that network performance around the Sydney Interchange will either not improve significantly or even actually worsen. The M4-M5 link is reliant on a road which is unfunded and whose route has not been finalised.

Boundaries of the study area

The boundaries of the areas of operational modelling are too narrow to fully assess the Project's impacts on Alexandria, as well as key strategic centres such as the Sydney Central Business District. The St Peters operational model (Fig 8-6) does not, for example, cover the full length of Mitchell Rd or Euston Rd, and does not reach Fountain Street or McEvoy Street. This means that the Alexandria community is not able to judge the effects of the project on local streets. Impacts on local streets need to be modelled as part of the EIS.

Land use and property

Increased traffic on local roads will decrease residential amenity and decrease the potential for new higher density housing. This will affect numerous streets, with particularly major impacts on streets in Alexandria: Euston Road, McEvoy, Botany, Wyndham Streets.

Urban design and amenity

The St Peters Active Recreation Area is of no value to the community. Sited around a ten-storey high motorway and in proximity to pollution stacks, it does not increase the amenity of our local area.

Increased traffic cannot be accommodated in our area, or in Central Sydney. It will further impede pedestrian movement and comfort and undermine easy access to public transport and reduce access to jobs over large areas of the city.

From: [REDACTED]
Sent: Sat, 14 Oct 2017 04:19:56 +0000
To: [REDACTED]
Subject: FW: Submission Details for company Stop WestConnex-Glebe Forest Lodge (org_object)

From: system@accelo.com On Behalf Of Jan Wilson
Sent: Saturday, 14 October 2017 3:19:05 PM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for company Stop WestConnex-Glebe Forest Lodge (org_object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Jan Wilson
 Organisation: Stop WestConnex-Glebe Forest Lodge (Coordinator)
 Govt. Agency: No
 [REDACTED]

Address:
 [REDACTED]

Glebe, NSW
 2037

Content:
 Stop WestConnex-Glebe Forest Lodge
 Application No. SSI 7485 Submission
 Director, Transport Assessments Planning Services
 Department of Planning and Environment
 Dear Sir / Madam

Stop WestConnex-Glebe Forest Lodge Group, representing the residents of Glebe/Forest Lodge is lodging a formal objection to the M4-M5 Stage 3 EIS.

Stop WestConnex-Glebe Forest Lodge strongly objects to this proposal in its entirety and urges the Secretary of Planning to advise the Minister to refuse the application based on issues listed below. NSW Planning must require the Proponent to properly and adequately address the impacts set out below, that 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.

Stop WestConnex-Glebe Forest Lodge objections are based on the following issues:

- * The WestConnex M4-M5 Link EIS released on 18 August 2017 lacks legitimacy as no detail has been provided on the exact geographical location or specifications of the project. This EIS has been prematurely released before geotechnical and utilities explorations have been completed and before a detailed design has been prepared.
- * 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.'

- * No 'in-depth description of the project' has been provided as promised in the M4-M5 Link Community Feedback Report dated 12 May - 4 August 2017 (Vol. 1A Page 34).
- * The environmental impact of the project cannot be properly assessed without a detailed design and stated location.
- * No alternative routes to the proposed M4-M5 Link have been investigated methodically in the EIS.
- * The EIS is based on false traffic modelling and forecasting, using an unconstrained traffic model. The traffic modelling must be subject to independent testing by qualified academic researchers and peer reviewed.
- * Similarly the data on the safety and efficacy of proposed unfiltered ventilation stacks must be peer reviewed by independent academic researchers. Alternatives to any proposal to build three unfiltered vent stacks in low-lying parts of Rozelle under the Sydney Airport path, must be provided as this is contrary to best practice.
- * The current EIS does not provide a direct, fast or safe connection to Port Botany for freight or a design solution for Sydney Airport.
- * There has been a complete lack of concern for the welfare of the community, with acquisition of private properties and intrusion into historic suburbs. We share the concerns of our neighbours in Annandale, Leichhardt, Rozelle and Camperdown about the future congestion that will occur from drivers avoiding tolls.
- * The proposed M4-M5 Link will only add to the congestion in Sydney and cause increased traffic on local streets. The quality of life will be impaired as a result of the increase in traffic.
- * We share the concerns of ALL Sydney residents about more money being spent on the construction of roads rather than on public transport.
- * It is possible to construct Stage 3 without mid-point Dive Sites. Whilst it may be more costly and slower for Sydney Motor Corporation initially, the benefit for the community in the long term would be significant. Less traffic during construction period. No Dive site constructions would mean no disruption mean to local amenities.
- * This EIS is therefore speculative, based on a concept design, rather than based on fact.

Submission: Online Submission from company Stop WestConnex-Glebe Forest Lodge (org_object)
https://majorprojects.accelo.com/?action=view_activity&id=227527

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

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

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: FW: Submission Details

From: system@accelo.com On Behalf Of [REDACTED]
Sent: Monday, 16 October 2017 10:11:05 AM (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:

One of the objectives of the M4-M5 is to facilitate the Western Harbour Tunnel and Beaches Link, this supposedly are still being planned, and are subject to a reference design and government funding and planning approval.

The M4-M5 Link will overload the Anzac Bridge with traffic - and that will then make the Western Harbour Tunnel 'necessary' - the EIS even identifies the Western Harbour Tunnel as mitigation for the impacts of the M4-M5 Link. This is ridiculous and exposes the fallacy of constructing motorways to 'solve' congestion.

The M4-M5 Link planning approval will include the connections for the Western Harbour Tunnel - this is a government investment in the Western Harbour Tunnel even though we are told no decisions have been made.

The M4-M5 Link - like other sections of WestConnex - will induce additional traffic on to the road network - just building up congestion and the need for more roads across Sydney.

Tolls on WestConnex will almost certainly be rising faster than wages - making these toll roads ever more unaffordable and pushing more traffic on to local surface roads.

The M4-M5 Link will concentrate pollutants from exhaust and roads including particulate matter which will then be vented out through stacks. These carcinogenic pollutants will impact wide areas of Sydney with the particularly damaging finer particulates spreading out across the metropolitan area. More air pollutants result in more people dying prematurely from a range of diseases and conditions.

Surface roads will be used by traffic entering and leaving the motorway portals - and by traffic avoiding the cost of tolls. This traffic makes us less safe - the EIS demonstrates that more traffic results in more

road traffic accidents.

The M4-M5 Link will increase traffic on the Anzac Bridge, impact Sydney's city centre. This will reduce the economic efficiency of the city centre - and the whole of Sydney, NSW and Australia relies on the Sydney city centre economically.

It is likely that my children - who are still too young to hold driving licenses - will be retired before the concession period expires on the M4-M5 Link. Throughout their working lives they will be paying taxes to support WestConnex. This is even more ridiculous given all predictions are that personal transport will have changed hugely in a fraction of this time - in all likelihood we will not be owning or driving our own cars within the next 30 years.

The M4-M5 Link will see whole areas of Sydney under threat - again. More trees and homes will be lost. More residents will be displaced from their homes and communities. Sydney will become less liveable as a result.

IP Address: [REDACTED]

Submission: Online Submission from [REDACTED] (object)

https://majorprojects.accelo.com/?action=view_activity&id=227957

Submission for Job: #7485 WestConnex M4-M5 Link

https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: FW: Submission Details
Attachments: 227959_ [REDACTED] _OBJECTION_SUBMISSION_2017Oct16_1011.pdf

From: system@accelo.com On Behalf Of [REDACTED]
Sent: Monday, 16 October 2017 10:12:07 AM (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:
Objection attached.

IP Address: [REDACTED]
Submission: Online Submission from [REDACTED] (object)
https://majorprojects.accelo.com/?action=view_activity&id=227959

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

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

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 an appalling waste of public funds and I completely object to this proposal. Any project that requires more than 7000 pages for an EIS raises serious doubts about its complexity, its huge number of unanswered questions and the fundamental vagueness of the plans. The Secretary of Planning must advise the Minister to reject the EIS and refuse the application. Below are the key points of my submission.

1. Spaghetti Network of Tunnels under homes
2. Only indicative – leaves open for major changes with no community input.
3. There are material subsidence issues for every single home above the Rozelle interchange which adds hugely to the scale, cost, and nature of disruption
4. The fundamental lack of notification and engagement from the State Government is untenable.
5. The air pollution during operation is unacceptable
6. The noise and air pollution during construction are unacceptable
7. WestConnex cannot deliver to the people of Western Sydney
8. WestConnex will usurp public funds for transport for decades
9. The planning process is legally and ethically flawed

1. Spaghetti Network of Tunnels under homes

According to the 'concept design', the tunnels under Rozelle/Lilyfield are going to be in 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 hold up on the deepest of these tunnels, the air quality will very quickly become toxic unless substantial air conditioning is a major part of the design.

At one of the community meetings I attended, the standard response to many of the residents questions were 'That is beyond my remit' or 'That will be answered in the EIS.' We received no real information. It was like the supplied designs: pretty artist impressions, vague tunnel pathways and no detail. And now, the EIS is just as short on answers.

2. Only indicative – leaves open for major changes with no community input

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.

Overall, there has been a lack of meaningful consultation with stakeholders and the community before this EIS was lodged. Since "meaningful consultation" was one of the Secretary's requirements, I ask that you reject this EIS on this basis along.

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. 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.

3. There are material subsidence issues for every single home above the Rozelle interchange which adds hugely to the scale, cost, and nature of disruption

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 make two things terrifyingly clear for local home-owners

Firstly, the estimates of subsidence (10-50mm) are significant and enough to do real damage even at the lowest levels. Our homes are at extreme risk from the tunnelling.

Secondly, the estimates of subsidence are questionable at best – the locations are unclear and unplanned, the scale of what is planned is technically questionable, and even it were buildable, the geological location will warrant continuous dewatering which will drive continued subsidence for decades to come.

Furthermore, experience in Haberfield of current tunnelling processes has been appalling – the Conditions of Approval for Stage 1 and 2 have not protected residents – reports are now documented showing residents who have abided by the process in good faith, and suffered substantial (up to \$100,000) of damage to their homes, are unable to hold subcontractors accountable for recompense.

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.

4. The fundamental lack of notification and engagement from the State Government is untenable.

What is most appalling about this whole process is the State Government's complete disregard for the community they are elected to represent. The removal of elected councillors during critical phases of WestConnex and the insertion of an administrator across the three key inner west council areas who was previously an executive in early stages of WestConnex is unethical.

The lack of notification of residents of the existence of the EIS by State Government is appalling. The hiding of the potential for material damage to resident's homes deep within a document that is 7500 pages long is disingenuous and deceptive.

5. The air pollution during operation is unacceptable

The number and scale and lack of filtering on the planned airstacks is unacceptable. Diesel particulates are a known carcinogen, and are cumulative. If ex-Planning Minister Rob Stokes is unwilling to expose children in his own electorate, then the NSW Government must be unwilling to expose children or others in Labour electorates.

6. The noise and air pollution during construction are unacceptable

The siting of construction areas, the number of truck movements required 24 hours to remove tunnel spoil, the associated drilling, the duration of construction (5+) years, all point to the stupidity of the project in the first place, and are unacceptable.

7. WestConnex cannot deliver to the people of Western Sydney

The government's own modelling shows that there is inadequate capacity on receiving roads for the new traffic from WestConnex, so the bottleneck problem will simply shift locations – it will not be solved by WestConnex. It will instead make both ends worse off, including on Victoria Rd, Anzac Bridge, and City West Link. In addition, Western Sydney residents are mostly those who are least able to afford expensive tolls. Furthermore, as we move rapidly towards autonomous vehicles, it is now clear that car ownership will shift enormously, so the demand for road space will reduce dramatically. So, within a short period – as little as 10-15 years – this motorway will be unnecessary. It simply should not be built. Instead, the State Government should invest in real public transport options, following the lead of real global cities, like London.

8. WestConnex will usurp public funds for transport for decades

It is now clear that both the operational and capital costs of WestConnex will take so much of the public budget that few if any other major transport investments will be possible for a decade or more. This puts Sydney in a parlous position for its status as a global city. The modelling in the EIS brings the financials into question. There is a real risk of a situation like the Cross City Tunnel and many other motorway projects around Australia – where the public wears the risk and foots the bill for long term financial contracts with private operators.

This investment is not economically efficient. Already, we know the budget has blown out incredibly and it's financial viability was questionable then. Now, it is clear the numbers don't add up. For the first decade or so of the life of this project, the government's own modelling shows the system will not work because there is inadequate capacity on local arterials (Anzac Bridge, Victoria Rd) to absorb the increase in traffic. Thereafter, the demand will diminish significantly because of the combination of the move to autonomous vehicles, the capacity for e-workers to base themselves anywhere, and an increase in shared ownership and use of cars. The future will not be a continuation of the exact same needs and elements of the transport mix. It would be hopeful to have a government who held more than a short-term vision.

9. The planning process is legally and ethically flawed

Approval precedes design for Stage 3 with the plan to let the tender by early 2018, but consultation not planned til mid 2018, which renders the consultation meaningless. Instead there must be public exhibition of Submissions and Preferred Infrastructure Report.

To summarise, I request again that the Minister reject this EIS outright, stop this ludicrous process, halt planning approval for the project as a whole, and call for an independent inquiry into the debacle WestConnex has become.



From: [REDACTED] <campaigns@good.do>
Sent: Monday, 16 October 2017 4:17 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.

The entire proposal for WestConnex is an appalling waste of public funds and I completely object to this proposal. Any project that requires more than 7000 pages for an EIS raises serious doubts about its complexity, its huge number of unanswered questions and the fundamental vagueness of the plans. The Secretary of Planning must advise the Minister to reject the EIS and refuse the application. Below are the key points of my submission.

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At one of the community meetings I attended, the standard response to many of the residents questions were 'That is beyond my remit' or 'That will be answered in the EIS.' We received no real information. It was like the supplied designs: pretty artist impressions, vague tunnel pathways and no detail. And now, the EIS is just as short on answers.

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Overall, there has been a lack of meaningful consultation with stakeholders and the community before this EIS was lodged. Since "meaningful consultation" was one of the Secretary's requirements, I ask that you reject this EIS on this basis alone.

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. 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.

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Furthermore, experience in Haberfield of current tunnelling processes has been appalling – the Conditions of Approval for Stage 1 and 2 have not protected residents – reports are now documented showing residents who have abided by the process in good faith, and suffered substantial (up to \$100,000) of damage to their homes, are unable to hold subcontractors accountable for recompense.

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To summarise, I request again that the Minister reject this EIS outright, stop this ludicrous process, halt planning approval for the project as a whole, and call for an independent inquiry into the debacle WestConnex has become.

[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 To learn more about web protocol FC 3834 visit: www.rfc-base.org/rfc-3834.html

From: [REDACTED]
Sent: Sun, 15 Oct 2017 23:17:26 +0000
To: [REDACTED]
Subject: FW: Submission Details for Suzannah Potts (object)
Attachments: 227961_Westconnex objection letter 171016_2017Oct16_1016.pdf

From: system@accelo.com On Behalf Of Suzannah Potts
Sent: Monday, 16 October 2017 10:17:08 AM (UTC+10:00) Canberra, Melbourne, Sydney
[REDACTED]
Subject: Submission Details for Suzannah Potts (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Suzannah Potts
[REDACTED]

Address:
[REDACTED]

Ashfield, NSW
2131

Content:
See attached later below

[REDACTED]
Submission: Online Submission from Suzannah Potts (object)
https://majorprojects.accelo.com/?action=view_activity&id=227961

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

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

RE: West Connex EIS - M4/ M5 Link

I am writing to object to the recent Westconnex proposal to use Muirs site along Parramatta Rd Haberfield / Ashfield as part of the construction site for the next stages of M4/M5 extension, as outlined as Option B in the recent Westconnex info sheets.

I wrote back in October 2015 outlining my strong opposition to the Westconnex project in principle, believing investments in public transport was the better solution for Sydney's traffic problems. I also then expressed my grave concerns for the short and long term health outcomes on my family especially my primary school aged children who would be greatly effected by the construction of this infrastructure.

Two years into the project, it seems clear that Westconnex is not concerned about the communities it is cutting through and the effect it has on them. Here we are again trying to stop the proceeding of another significant construction site located less than 200m away from Haberfield Primary School, a large primary school with over 600 children.

When the Westconnex team came to discuss the project with our school community back in October 2015, there were assurances that they were listening to the communities and wanted to understand our concerns and limit the impact, however it does not feel that there has been much done to mitigate the large amounts of dust and control the traffic problems / concerns within our local streets.

My objection to the project include the following short / mid term concerns;

- 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, which will have significant noise and air quality impacts for surrounding residences as well as students and staff of the school.
- The light vehicle and heavy vehicle traffic associated with Option B (including over 140 heavy vehicle movements per day) would create real and significant safety risks for our children in travelling to and from the school during school drop-off and pick-up times, it is this that concerns me to allow my children to walk to school independently.
- The proposal would lead to significant traffic impacts along Bland Street particularly light traffic movements going to and from the civil site entrance/exit on Bland Street, and likely loss of parking near the school due to construction vehicles parking along local roads
- The dust associated with the demolition work on the Muirs sites followed by the tunnelling and spoil haulage activity will increase the risk of respiratory illness in our children
- Option A, being the alternative combination of construction facilities presented in the EIS, would utilise existing construction areas and whilst this is still not a great outcome to our greater community it would be located further away from sensitive uses including schools (like Haberfield Public) and day care centres and presents a far safer option with materially less impact.

I also have some long term concerns with the proposal to include an additional stack for the new M4/M5 link;

- I would like to see the ventilation stacks to be filtered. I note that when this stage is completed, the Haberfield stack will release large volumes of emissions from two sections of WestConnex over our community.

I cannot understand why if the NSW government is spending billions of dollars on this project, if it cannot afford to filter the stacks.

Again it is of great concern with what is being **said** by Westconnex representatives and what ends up being **done** as we were assured this would not happen (back in 2015), so it is with disbelief that we are discussing it again.

I would like to see Westconnex ensure that our children's health is of the highest priority in their list of concerns and spend an equal amount of time and energy ensuring that all resources are used to ensure their long term health and safety. This might mean ensuring that air quality is monitored (on site) and the school be compensated for remedial works to the school buildings / grounds to ensure they can work and play safely in the grounds.

Finally I would like to highlight the need to ensure that there is significant time and energy making sure that the residual areas surrounding the Westconnex infrastructure is well considered and provide an opportunity to bring the local communities back together.

The current infrastructure works are making large cuts into the surrounding suburbs and it is really important that Westconnex seizes the opportunity to give back and ensures that these do not remain as scars on the landscape for future generations but rehabilitates the surrounding areas to allow the urban fabric to be stitched back together. Therefore, I would like to see significant consideration and money invested into the residual green spaces and allow the reconnection of pedestrian and cycle paths, to allow a healthier community that utilises its open spaces and encourages better more accessible spaces for people to use.

Thank you for considering my concerns. I look forward to hearing our concerns being address in the final proposal.

Kind regards,

Suzannah Potts

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: FW: Submission Details

From: system@accelo.com On Behalf Of [REDACTED]
Sent: Monday, 16 October 2017 10:21:01 AM (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]
[REDACTED]

Content:

I am concerned about many aspects of Westconnex including the impact of Westconnex on air quality and particularly concerned about unfiltered emissions stacks. A government that cares for the environment and future generations would not be investing in a road solution but would be investing in world class public transport. The process for community consultation appears to be designed to stop the community from understanding the true impact of Westconnex. The budget is uncertain, the design unworkable, and the benefits to communities have not been proven. The business case is also very shaky. I fear a repeat of the disaster of the cross city tunnel. The social impact on residents in the inner west has been and will continue to be devastating. It is difficult to support a project that is conceived in secrecy, facts obfuscated by political discourse, and where the only clear winners appear to be construction companies and toll companies. This project is not a long term solution to anything - it's impact on the environment is extremely negative and the supposed 'greater good' argument has not been sufficiently prosecuted. With the latest switch in strategy, it appears to be a runaway project, where the threads are so loose they may never be pulled together as a coherent solution to Sydney's transport issues. Unfortunately there is little trust between the community and the government on this issue.

IP Address: [REDACTED]
 Submission: Online Submission from [REDACTED] (object)
https://majorprojects.accelo.com/?action=view_activity&id=227963

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

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

From: [REDACTED]
Sent: Sun, 15 Oct 2017 23:25:13 +0000
To: [REDACTED]
Subject: FW: Submission Details for [REDACTED] (object)

From: system@accelo.com On Behalf Of [REDACTED]
Sent: Monday, 16 October 2017 10:23:03 AM (UTC+10:00) Canberra, Melbourne, Sydney
To: [REDACTED]
Subject: Submission Details for [REDACTED] (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: [REDACTED]

Email: [REDACTED]

Address:

[REDACTED]

[REDACTED]

Content:

We need more train and bus services in the Inner West.

We need safe and reliable public transport.

Sydney's public transport needs to be reliable, affordable and safe for all areas of Sydney.

History needs to be saved and protected. This has not happened.

We need fewer cars on the roads of Sydney.

We need to respect peoples' health and the environment.

We need to respect communities and all of our amenities, parks, shops, schools, hospitals, cultural centers etc

Train services to the airport needs to be a priority from all over Sydney.

This project is destroying not planning.

This project is destroying not planning for now or the future.

IP Address: [REDACTED]

Submission: Online Submission from [REDACTED] (object)

https://majorprojects.accelo.com/?action=view_activity&id=227967

Submission for Job: #7485 WestConnex M4-M5 Link

https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

<p>Attention Director Application Number: SSI 7485</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: [REDACTED]</p> <p>Signature: [REDACTED]</p> <p>Please <u>include</u> 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: [REDACTED]</p> <p>Suburb: [REDACTED] Postcode [REDACTED]</p>
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I object to the WestConnex M4-M5 Link proposals for the following reasons:

- I. The volume of extra heavy traffic in the Rozelle area and the acknowledged impact this will have on local roads is completely unacceptable to me.
- II. The social and economic impact study fails to record the great concern for valued Newtown heritage
- III. 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.
- IV. The consultants for the Social and Economic Impact study is HillPDA. This company has a conflict of interest and is not an appropriate choice to do a social impact study of WestCONnex. Amongst its services it offers property valuation services and promotes property development in what are perceived to be strategic locations. HillPDA were heavily involved in work leading to the development of Urban Growth NSW and the heavily criticised Parramatta Rd Study. It is not in the public interest to use public funds on an EIS done by a company that has such a heavy stake in property development opportunities along the Parramatta Rd corridor. One of the advantages of property development along Parramatta Rd that Hill PDA promotes on its website is the 33 kilometre WestCONnex.
- V. The EIS acknowledges that extra construction traffic will add to travel times across the Inner West and have a negative impact on businesses in the area. No compensation is suggested. These impacts are not been taken into account of evaluating the cost of WestCONnex.
- VI. The EIS acknowledges that 'rat running' by cars to avoid added congestion and delays caused by construction traffic will put residents at risk. No only solution is a Management Plan, which is yet to be developed, and to which the public will have no impact. This is completely unacceptable.
- VII. The EIS refers to be construction impacts as being 'temporary'. I do not consider a five year construction period to be temporary.
- VIII. Table 6.1 in Appendix Q (Social and Economic impact) is not an accurate report on the concerns of residents. It downgrades the concerns of Newtown, St Peters and Haberfield residents. It does not even mention concerns about additional years of construction in Haberfield and St Peters. It also does not mention concerns about heritage impacts in Newtown. I can only assume that this is because there was almost no consultation in Newtown and a failure to notify impacted residents including those on the Eastern Side of King Street and St Peters.

From: [REDACTED] <campaigns@good.do>
Sent: Monday, 16 October 2017 9:54 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.

We need more train and bus services in the Inner West. We need safe and reliable public transport. Sydney's public transport needs to be reliable, affordable and safe for all areas of Sydney. History needs to be saved and protected. This has not happened. We need fewer cars on the roads of Sydney. We need to respect peoples' health and the environment. We need to respect communities and all of our amenities, parks, shops, schools, hospitals, cultural centres etc Train services to the airport needs to be a priority from all over Sydney. This project is destroying not planning for now or the future.

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 dive site. The site cannot accommodate the projected traffic movements without jeopardising the road network. Darley Road is a critical access road for the residents of Leichhardt and the inner west to access and cross the City West Link. As the EIS acknowledges, this route is already congested at peak hours. The intersection at James Street and the City West link already has queues at the traffic lights. The only other option for commuters to access the city West Link is to use Norton Street, a two-lane largely commercial strip which is already at capacity. The addition of hundreds of trucks and contractor vehicles will result in traffic grinding to a halt and traffic chaos at this critical juncture with commuter travel times drastically increased.

I object to the acquisition of this site on the basis that Dan Murphys renovated and started a new business in December 2016, in full knowledge that they were to be acquired, with the acquisition process commencing early November 2016. This is maladministration of public money and the taxpayer should not be left to foot the compensation bill in these circumstances. With the Premier having now been referred to ICAC over the lease extension granted over this site, it is very clear that there has been a lack of transparency in the dealings with this site.

The 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.

I repeat We need more train and bus services in the Inner West. We need safe and reliable public transport. Sydney's public transport needs to be reliable,affordable and safe for all areas of Sydney. History needs to be saved and protected.This has not happened. We need fewer cars on the roads of Sydney. We need to respect peoples' health and the environment. We need to respect communities and all of our amenities, parks, shops, schools, hospitals, cultural centres etc Train services to the airport needs to be a priority from all over Sydney. This project is destroying not planning. This project is destroying not planning for now or the future.

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 To learn more about web protocol FC 3834 visit: www.rfc-base.org/rfc-3834.html

From: [REDACTED]
Sent: Sun, 15 Oct 2017 23:47:19 +0000
To: [REDACTED]
Subject: FW: Submission Details for Christine Kwan (object)

From: system@accelo.com On Behalf Of Christine Kwan
Sent: Monday, 16 October 2017 10:29:09 AM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for Christine Kwan (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Christine Kwan
 [REDACTED]

Address:
 [REDACTED]

Rozelle, NSW
 2039

Content:

I OBJECT to the proposal.

I reside in Rozelle and I have children attending the local school.

I'm deeply concerned with the impact that construction will have on our health from such things as dust, noxious gases and asbestos. In particular for those who have existing health issues.

There are also many childcare centres in the neighbourhood.

Concern relating to the noise, especially the impact it has on children with hearing impairment who already struggle with the usual background noise. As well as increased traffic due to movement of construction vehicles causing parking problems and safety issues especially so close to the school.

I strongly believe all ventilation shafts should be filtered, plus correct greenery planted to absorb some of the pollution.

The community also must be consulted and approve of any changes to the design.

The Iron Cove link should remain toll free to avoid rat runs caused by users avoiding tolls.

I object to the construction and believe an overhaul of the public transport system would be the right thing to do. If construction really is to go ahead I strongly urge you to rethink the design with the lives of human beings who reside here in your mind.

[REDACTED]
 Submission: Online Submission from Christine Kwan (object)
https://majorprojects.accelo.com/?action=view_activity&id=227973

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

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

From: [REDACTED]
Sent: Mon, 16 Oct 2017 00:08:41 +0000
To: [REDACTED]
Subject: FW: Submission Details for Robert Wood (object)

From: system@acelo.com On Behalf Of Robert Wood
Sent: Monday, 16 October 2017 11:08:05 AM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for Robert Wood (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Robert Wood
 [REDACTED]

Address:
 [REDACTED]

Balmain, NSW
 2041

Content:
 Thank you for the opportunity to make this submission.

I wish to object to the totality of the Westconnex project. As a long time Sydney resident I am the first to acknowledge that effective and efficient transport infrastructure will be key to safeguarding the future of this city. Investment is therefore required. The idea that a modern city in a developed country would be investing in excess of \$16 billion dollars on a road project to bring more people into and out of the congestion in the city is frankly insane. The investment we need is in public transport to make Sydney a more functioning and liveable city. Stop people getting in their cars and build a proper metro. Put in a congestion tax to help fund this infrastructure that will be the backbone of the city for many decades.

If the Government insists on wasting public money and proceeds with building westconnex can you please have the common sense to assess the impacts on the communities it will affect. I am specifically concerned about the construction near Rozelle Public School - where my two children and more than a thousand other children attend each day...

I am very concerned about the impacts of this project on my children's health with 4-5 years of construction as close to the school as Wellington Street. At the very least the Government should commit to the following as a minimum:

- * Air quality monitoring at the school before, during and after construction
- * The ventilation shaft at Terry Street to be filtered for PM2.5, or moved to a safer distance away from the school
- * Truck management plans to ensure children's safety near the school
- * Protection against excessive noise, dust, vibration and pollution during construction

Sincerely

Rob Wood
0401733596


Submission: Online Submission from Robert Wood (object)
https://majorprojects.accelo.com/?action=view_activity&id=227993

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

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

From: [REDACTED]
Sent: Mon, 16 Oct 2017 00:18:44 +0000
To: [REDACTED]
Subject: FW: Submission Details for Jane Morris (object)

From: system@acelo.com On Behalf Of Jane Morris
Sent: Monday, 16 October 2017 11:18:02 AM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for Jane Morris (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Jane Morris
 [REDACTED]

Address:
 [REDACTED]

Ashfield, NSW
 2131

Content:
 WestConnex - M4-M5 Link - EIS for Haberfield/Ashfield area

Dear Sir/Madam

I write regarding the EIS for the proposed Haberfield/Ashfield M4-M5 Link.

My family are residents in this area with a child who attends Haberfield Public School. We have great concerns regarding the plans for the next stage of this project and its affect on the school and local environs.

After attending many community meetings within and outside my daughters school it was made clear very early on that the negative impact and inconvenience faced by local residents would be of a 4 year duration and that this was a necessary project for Sydney roads to grow with the population. I do not believe it is reasonable for our local area to bear the brunt of the next stage of this project when other options in other areas appear to be unexplored. If the roads are for all to share then so should the pain of their construction and ongoing effects.

Specific objections to the upcoming Stage 3 project regard Option B as it will have a detrimental effect on the children at Haberfield Public School. To locate a significant construction site 200m from a primary school with more than 600 children coming and going is completely inappropriate. The impact of noise and air quality from this site will impact upon our childrens' health and learning. This school does not have double glazing or air conditioning in all class rooms and is reliant on having windows open for ventilation. The use of the car yards (Muir's) and the dust associated with the demolition work along with tunnelling and spoilt haulage will increase the risk of respiratory problems for our children. The dust in the area currently is often visible and of concern to many of us, particularly those parents with asthmatic children. Of great concern is the proposed heavy vehicle traffic that will impact Bland Street and the consequent risk for children going to and from school. A child has already been hit on Bland Street due to increased traffic when Ramsay Street was closed for this project. Many children walk to Haberfield Public School and drop offs and pick ups are already problematic due to the current site. It can only be envisaged this

will worsen with the next stage if it were to be closer to the school.

It is not appropriate or 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. Our current Education Minister has made it clear that a project like this should not be near primary schools.

If we are to a further burden in our community then please consider Option A as the option that will cause the least affect on our children at Haberfield Public School.

I would also request again that filtering be considered with the stacks down the road as now we are not only getting the toxic emissions from one section but two sections of this road and it is inconceivable that billions can be spent on this project with no consideration to the ongoing health effects of the people who live around the stacks, and particularly those with developing lungs - children. Again our current Education Minister has advised that he would fight the idea of stacks in his local area due to ongoing concerns of the health risks associated with emissions and children.

Hence, we call for filtration of the stacks and that Option 'A' be chosen if we are to have the burden of Stage 3 on our doorstep again.

Regards,

Jane & David Morris

Submission: Online Submission from Jane Morris (object)

https://majorprojects.accelo.com/?action=view_activity&id=227997

Submission for Job: #7485 WestConnex M4-M5 Link

https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: FW: Submission Details

From: system@acelo.com On Behalf Of [REDACTED]
Sent: Monday, 16 October 2017 11:55:05 AM (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:

Objection to the WestConnex M4-M5 Link EIS

Thank you for the opportunity to comment on the subject EIS. As a local resident of Rozelle I oppose this project and the associated EIS for the following reasons:

Construction Impacts

1. I am concerned with the lifestyle, welfare and amenity impacts associated with construction in the immediate vicinity of residences. Effects such as noise, dust, vibration, safety and increased local traffic will detract from resident well being for extended periods for a number of years.
2. I am particularly concerned that this project will restrict access (either formally or through second order affects) to our local recreational facilities such as Easton Park, King George Oval and the Bay Run. These are key open spaces for the well being of many families and residents within the Rozelle area.

Long Term Impacts

3. This project is designed to direct additional traffic loads into two already congested traffic choke points - the Anzac Bridge and Victoria Road, Drummoyne. This will have a significant impact on local traffic in Rozelle as the area becomes a 'parking station' for those using public transport to the city and the minor streets of Rozelle become rat runs for those avoiding tolls. I fear residential parking amenity will be lost, pedestrian safety compromised and emergency services access within our community lost due to traffic congestion within the suburb.
4. Increased pollution is a significant issue. As mentioned above this project will increase local traffic as more and more cars idle at intersections and wait to find parks on our suburban streets. This will increase

combustion related pollution for the residents of Rozelle. Of greatest concern however is the plan to concentrate the pollution from light and heavy vehicle polluters using the tunnel network into outlets in Rozelle. I note the plan to increase the height of the stacks to protect residents at ground level, however this disregards the number of residences, businesses, schools and community facilities that lie on the elevated part of Rozelle. Associated with the fact that the two ventilation facilities are on either side of the suburb, Rozelle residents will be subjected to constant exposure to concentrated vehicle carcinogenic pollution during either westerly or easterly wind conditions. The role of Easton Park and King George Oval as significant open space recreation will be compromised by the presence of tunnel ventilation facilities.

5. Multiple tunnels are expected to be built in the vicinity of residences. Apart from the loss of amenity due to vibration and noise effects of living in proximity to a major heavy vehicle thoroughfare, I am also concerned about loss of residential property value due to damage and noise.

EIS Limitation

The EIS as published does not sufficiently address the prevention, monitoring or rectification of the impacts I expect to be the result of the construction of this project. The document lacks essential detail regarding mitigation strategies, protections and limitations on aspects as important as local traffic, pollution measuring and reporting, and impacts on existing amenities in Rozelle (such as parking, public transport, open space recreation and emergency service access) both during construction and after the project is completed. As a result this document does not leave me with any confidence that the project design or construction activities of the contractor will be managed to sufficiently address the health, welfare and safety concerns of the residents of Rozelle.

IP Address: [REDACTED]

Submission: Online Submission from [REDACTED] (object)

https://majorprojects.accelo.com/?action=view_activity&id=228007

Submission for Job: #7485 WestConnex M4-M5 Link

https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

From: [REDACTED]
Sent: Mon, 16 Oct 2017 01:00:31 +0000
To: [REDACTED]
Subject: FW: Submission Details for David Chow of David (object)
Attachments: 228009_Objection to Westconnex Stage 3_ DCHOW and JCHEN_2017Oct16_1154.pdf

From: system@accelo.com On Behalf Of David Chow
Sent: Monday, 16 October 2017 11:56:16 AM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for David Chow of David (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: David Chow
 Organisation: David (Chow)
 [REDACTED]

Address:

[REDACTED]

rozelle, NSW
 2039

Content:

I, David Chow and Jian Chen, owner of property at 5 Springside Street, Rozelle, is profoundly appalled by the Westconnex Stage 3. The EIS document does not provide sufficient information on the impact of the construction.

Given the proximity of my property to the

* proposed ventilation facility (< 10m away),

* ventilation stack (<30m away) and

* proposed construction site (<10m away) this is very significant impact to us.

The details in the report does not provide any design details as to the proposed ventilation facility other than the proposed dimension (which is the for the St. Peter Interchange). There is NO details on the Rozelle Ventilation facility, there is no details on the noise impact of ventilation facility nor the shadow impact to nearby residents.

[REDACTED]
 Submission: Online Submission from David Chow of David (object)
https://majorprojects.accelo.com/?action=view_activity&id=228009

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

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

Objection to Westconnex Stage 3

Date: 16th of October 2017

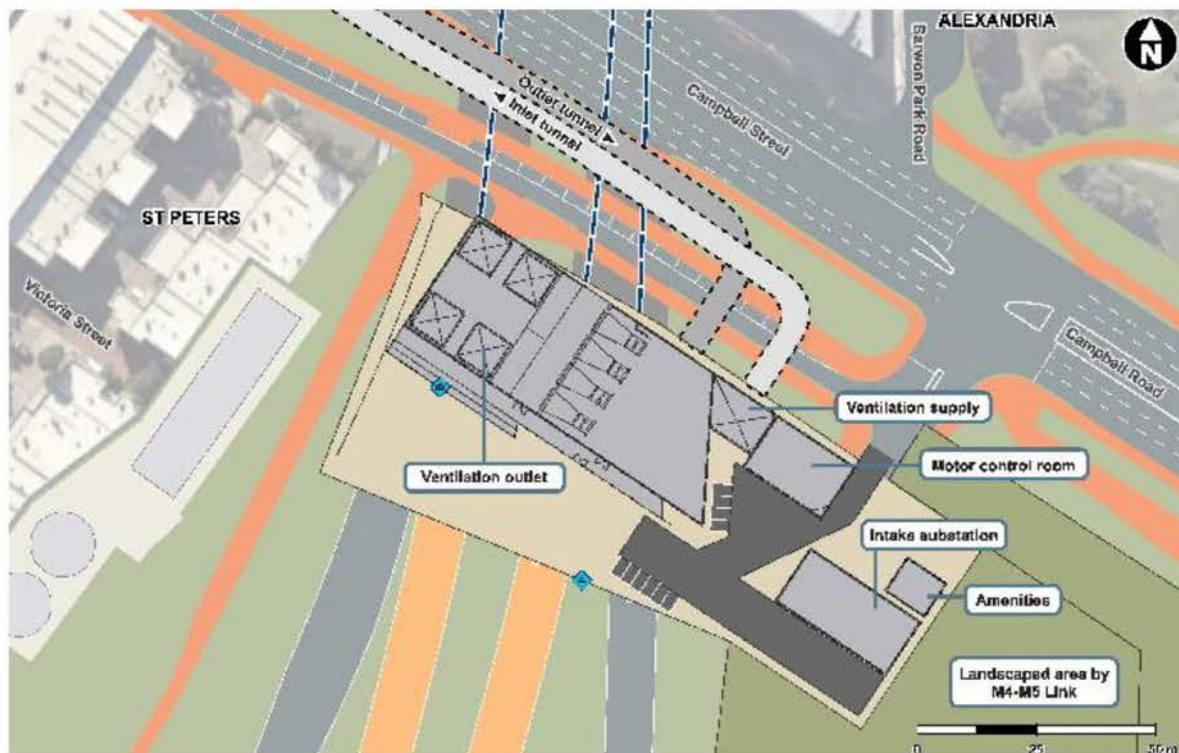
I, David Chow and Jian Chen, owner of property at 5 Springside Street, Rozelle, is profoundly appalled by the Westconnex Stage 3. The EIS document does not provide sufficient information on the impact of the construction.

Given the proximity of my property to the

- proposed ventilation facility (< 10m away),
- ventilation stack (<30m away) and
- proposed construction site (<10m away) this is very significant impact to us.

The details in the report **does not provide any design details** as to the proposed ventilation facility other than the proposed dimension (which is the for the St. Peter Interchange). There is **NO details on the Rozelle Ventilation facility**, there is **no details on the noise impact of ventilation facility** nor the **shadow impact to nearby residents**.

THERE IS DIAGRAM FOR ST PETERS VENTILATION FACILITY BUT NOT FOR ROZELLE.



HOW CAN AN EIS BE SUBMITTED WITHOUT KNOWING WHERE THE VENTILATION FACILITY WILL BE?
HOW CAN THE RESIDENTS RESPOND WHEN THE DEVELOPMENT ENTITY (SMC) DOES NOT EVEN
KNOW?

Iron Cove Link ventilation facility at Victoria Road

Two locations have been identified for the Iron Cove Link ventilation facility including:

- **On the southern side of Victoria Road** – this location at Springside Street is within the footprint of residual land created by the project. It is also close to residences and both the outlet (around 20 metres above existing ground level) and the ventilation building (around 12 metres above ground level) would be visible from Victoria Road and from a number of local roads at Rozelle
- **In the centre of Victoria Road** – this location was identified to increase the distance of the ventilation outlet from residences and to provide a more optimal urban design solution by creating a feature in the Victoria Road corridor and the local landscape. The outlet is expected to be around 20 metres above existing ground level. The ventilation building is the same size and in the same location as for the option on the southern side of Springside Street. This is the preferred option assessed in the EIS and described in more detail in **Chapter 5** (Project description).

CONSTRUCTION SITE USAGE AND OPERATING HOURS ARE NOT CONFIRMED

The construction site will be located approximate 10 meters from my property and there are no details on the hours of operation and the duration of the construction is are **“not limited to (civil and tunnel), sediment basins, temporary water treatment plants, precast yards and material stockpiles, laydown areas, workforce parking, maintenance workshops and offices.”**

Local Councils have no say over construction

- The EIS states that a Construction Traffic and Access Management Plan (CTAMP) “would be developed in consultation with local Councils and stakeholders associated with public facilities adjacent to project site”. A similar commitment was made for construction of the New M5 but that has not come into fruition. There is limited response to Council input and the Sydney Motorway Corporation and Roads and Maritime Services have neither shown any commitment to honour

Only partial construction impacts have been assessed

- The EIS states that spoil handling at the “occur 24 hours a day, seven days a week” for about four years. Given the land use surrounding the site is dense residential, what mitigation measures will be used to control noise, light spill, etc. outside normal business hours?
- The EIS focusses on the impact of construction traffic during commuter peak-hours. Given the EIS notes that construction-related vehicles will be limited during peak-hours, information should be provided on the impact of construction-related vehicles when both traffic volumes are higher – in particular during weekday lunch peak and Saturday lunch peak for sites
- The great number of heritage houses in the Rozelle interchange construction zone has not been specifically addressed. Noise and vibration impacts can have far more significant impacts on these types of properties. There is no functional management plan for these risks, no articulated complaints investigation process nor any articulated compensation and remediation strategy.

Air Quality and Impact to local schools

- Scientists have found that there is no safe level of air pollution. As pollution levels rise deaths and hospitalisations rise too . A thorough cost-benefit analysis that takes into account the health effects due to increased exposure is required.
- Concentrations of some pollutants PM2.5 and PM10 are already near the current standard and in excess of proposed standards (p9-81, p9-93). It is critical to note that these particulates are a classified carcinogen and are known to have critical, and at times fatal, consequences if elevated. People living within 500 metres of heavily affected areas have demonstrably shorter lives, much higher incidences of chronic lung conditions and higher levels of cardiovascular diseases.
- Significant declines in pollutants are due to improvements to in-vehicle technology and fuel. However, plans to improve standards for heavy vehicles, which disproportionately contribute to NOx emissions and thus ozone, appear to have stalled. The proponent needs to provide a scenario that sets out impacts due to delays in adopting improved emission standards.
- The EIS states that the impact on regional air quality is minimal and thus concludes that the project's impact on ozone is negligible. Ozone is a major pollutant and Western Sydney, Campbelltown in particular, suffers the worst ozone pollution. Major components of ozone are generated in eastern Sydney and drift west. Previous environment departments have spoken about the need for an eight-hour standard concentration and goal for ozone (DECCEW, 2010, State of Knowledge: Ozone). OEH needs to provide information about the value of this standard and on the impact of new motorways on that level.
- Given that the modelling for air quality is based on the traffic modelling, which, as shown above, is fundamentally flawed, and given poor air quality has a significant health impact the EIS should not be approved until an independent scientifically qualified reviewer has analysed the stated air quality outcomes and identified any deficits

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

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

8.1 The traffic modelling approach is fundamentally flawed and inaccurate

The wrong 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 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.

Key Inputs to the modelling process are unpublished or incorrect

- The accuracy of the model outputs can only be as good as the accuracy of the inputs. Projections of key inputs relating to population and employment become very unreliable beyond 10 or 15 years. In addition to this, the transport sector is facing a potentially significant disruption from connected, automated vehicles that may have a significant impact on traffic growth. This has not been considered or modelled.
- SMC is using an unpublished Value of Travel Time in the WestConnex traffic modelling. If the Value of Travel Time adopted is incorrect, then all outputs will be incorrect.
- The induced demand of 0.3% is too low based on historical experience in Sydney.
 - The benefits counted from reduced traffic volumes on roads such as the existing M5 and the Eastern Distributor are unlikely to be realized due to real levels of induced demand.
- The 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?*
- SMC refuses to release the traffic model and detailed analysis for independent unpaid peer review and scenario analysis.

Modelling scenarios are poorly defined and provide incomplete outputs

- The narrow boundaries of the areas of operational modelling mean the proponents have not fully assessed the Project's impacts on key strategic centres such as the Sydney Central Business District, Parramatta Road, the Anzac Bridge, the City West Link, the

Crescent and the flow of traffic north to Drummoyne at the approaches to the Iron Cove Bridge where gridlock already occurs.

- It is not understood why a mesoscopic modelling approach was not undertaken to gain a better understanding of impacts to the surrounding road network.
- The modelling conclusions are internally inconsistent. There is an assumption that traffic would dissipate at the edge of the motorway with no negative impacts on the CBD, Mascot and Alexandria. However there is also an assumption that additional roads would be needed to cope with said traffic.
- The EIS (including Appendix H) fails to provide traffic modelling outputs to assess impacts of the Project on CBD streets and intersections. Given the highly constrained and congested nature of the CBD, NSW Government policy focusses on reducing the number of cars in the CBD in favour of public transport, walking and cycling. The proponent should provide intersection performance results for the following intersections:
 - The ANZAC Bridge off-ramp to Allen Street/Botany Road
 - The Western Distributor off-ramp to Druitt Street (buses)
 - The Western Distributor off-ramp to Bathurst Street
 - The Western Distributor off-ramp to King Street/Sussex Street
 - Gardeners Road and Botany Road
 - All intersections within the modelled area in the Sydney CBD
- 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 construction impact of the future Western Harbour Tunnel and Beaches Link entry and exit ramps connecting to City West Link/The Crescent has been assessed. The operational traffic impact of these ramps has not. This should be completed and publicly released before determination. There is no verifiable or understandable data to determine the veracity of claims of traffic generated by these other links.

Traffic modelling was insufficient to assess the full impacts of the project.

- The underlying traffic modelling and outputs was insufficient to:
 - Demonstrate the need for the project.
 - Understand impacts of dispersed traffic on connecting roads, such as the Anzac Bridge, and whether they have available capacity to meet the predicted traffic discharge. Any congestion on exits has the capacity to negate all travel time savings to the exit point, given the small predicted benefits.
- The strategic model (whole system) inputs traffic volumes that simply cannot be accommodated in the road interchanges and feeder routes. It is physically impossible to fit that amount of traffic on a road.
- The 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.

- Volumes on the main links (the trunks) cannot be as high as what is claimed in the EIS. It is physically untenable. This would suggest surface roads across the Inner West should also be modelled in detail to see how they will cope with the overflow.
- The modelling shows the motorway exceeds reasonable operating limits in the peak in less than ten years.

Unreliable traffic projections snowball into compounding errors in the Project business case, design development and environmental assessment

- 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.

Evidence shows that the approach to traffic modelling in NSW is flawed

- The traffic modelling approach applied in the EIS is commonly used in NSW. This approach has proven to be flawed.
- 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)

Figure 1 –Growth in Road Vehicle Kilometres Travelled 2001 - 2011

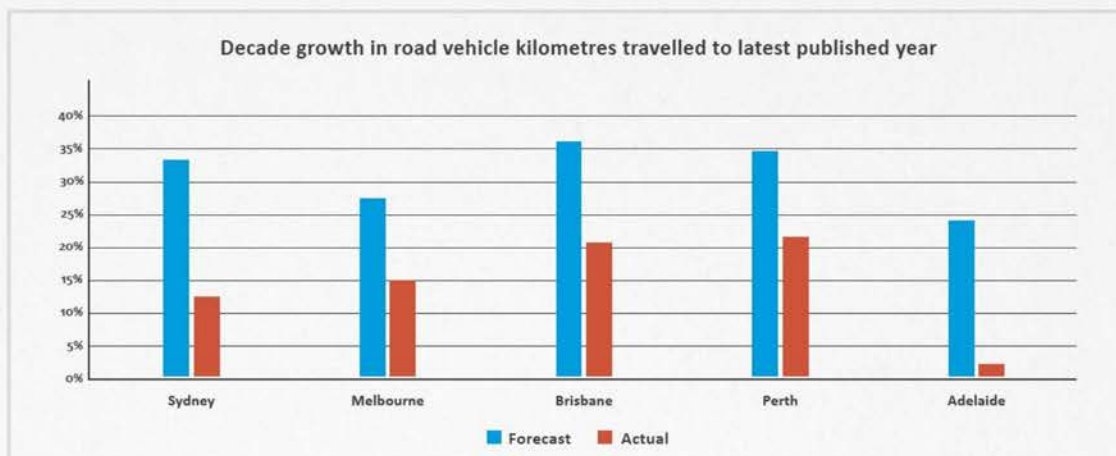


Table 3 (above): Road agency urban congestion growth forecasts for the decade to 2011-12 versus actual growth.
Source: Infrastructure Australia analysis, using BITRE Working Paper 71 *Estimating Urban Traffic and Congestion Cost Trends for Australian Cities* (2007) and actual statistics for same reported by BITRE to 2011-12.

- 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)

From: David Chow <campaigns@good.do>
Sent: Monday, 16 October 2017 12:15 PM
To: DPE CSE Information Planning Mailbox
Subject: Submission to WestConnex New M4/M5 EIS, project number SSI 16_7485

Objection to Westconnex Stage 3 Date: 16th of October 2017

I, David Chow and Jian Chen, owner of property at 5 Springside Street, Rozelle, is profoundly appalled by the Westconnex Stage 3. The EIS document does not provide sufficient information on the impact of the construction.

Given the proximity of my property to the • proposed ventilation facility (< 10m away), • ventilation stack (

THERE IS DIAGRAM FOR ST PETERS VENTILATION FACILITY BUT NOT FOR ROZELLE.

HOW CAN AN EIS BE SUBMITTED WITHOUT KNOWING WHERE THE VENTILATION FACILITY WILL BE? HOW CAN THE RESIDENTS RESPOND WHEN THE DEVELOPMENT ENTITY (SMC) DOES NOT EVEN KNOW?

CONSTRUCTION SITE USAGE AND OPERATING HOURS ARE NOT CONFIRMED The construction site will be located approximate 10 meters from my property and there are no details on the hours of operation and the duration of the construction is are “not limited to (civil and tunnel), sediment basins, temporary water treatment plants, precast yards and material stockpiles, laydown areas, workforce parking, maintenance workshops and offices.” Local Councils have no say over construction • The EIS states that a Construction Traffic and Access Management Plan (CTAMP) “would be developed in consultation with local Councils and stakeholders associated with public facilities adjacent to project site”. A similar commitment was made for construction of the New M5 but that has not come into fruition. There is limited response to Council input and the Sydney Motorway Corporation and Roads and Maritime Services have neither shown any commitment to honour

Only partial construction impacts have been assessed • The EIS states that spoil handling at the “occur 24 hours a day, seven days a week” for about four years. Given the land use surrounding the site is dense residential, what mitigation measures will be used to control noise, light spill, etc. outside normal business hours? • The EIS focusses on the impact of construction traffic during commuter peak-hours. Given the EIS notes that construction-related vehicles will be limited during peak-hours, information should be provided on the impact of construction-related vehicles when both traffic volumes are higher – in particular during weekday lunch peak and Saturday lunch peak for sites • The great number of heritage houses in the Rozelle interchange construction zone has not been specifically addressed. Noise and vibration impacts can have far more significant impacts on these types of properties. There is no functional management plan for these risks, no articulated complaints investigation process nor any articulated compensation and remediation strategy.

Air Quality and Impact to local schools

• Scientists have found that there is no safe level of air pollution. As pollution levels rise deaths and hospitalisations rise too . A thorough cost-benefit analysis that takes into account the health effects due to increased exposure is required. • Concentrations of some pollutants PM2.5 and PM10 are already near the current standard and in excess of proposed standards (p9-81, p9-93). It is critical to note that these particulates are a classified carcinogen and are known to have critical, and at times fatal, consequences if elevated. People living within 500 metres of heavily affected areas have demonstrably shorter lives, much higher incidences of chronic lung conditions and higher levels of cardiovascular diseases. • Significant declines in pollutants are due to improvements to in-vehicle technology and fuel. However, plans to improve standards for heavy vehicles, which disproportionately contribute to NOx emissions and thus ozone, appear to have stalled. The proponent needs to provide a scenario that sets out impacts due to delays in adopting improved emission standards. • The EIS states that the impact on regional air quality is minimal and thus concludes that the project's impact on ozone is negligible. Ozone is a major pollutant and Western Sydney, Campbelltown in particular, suffers the worst ozone pollution. Major components of ozone are generated in eastern Sydney and drift west. Previous environment departments have spoken about the need for an eight-hour standard

concentration and goal for ozone (DECCEW, 2010, State of Knowledge: Ozone). OEH needs to provide information about the value of this standard and on the impact of new motorways on that level. • Given that the modelling for air quality is based on the traffic modelling, which, as shown above, is fundamentally flawed, and given poor air quality has a significant health impact the EIS should not be approved until an independent scientifically qualified reviewer has analysed the stated air quality outcomes and identified any deficits. The St Peters and Rozelle interchanges are of particular concern. St Peters will have large volumes of vehicles accelerating and decelerating as they enter and exit tunnels and access roads, next to proposed playing fields. This is complicated by emissions stacks located in the Interchange – whereby pollution from the interchange is supercharged by the emissions from the stacks.

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

8.1 The traffic modelling approach is fundamentally flawed and inaccurate. The wrong 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 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.

Key Inputs to the modelling process are unpublished or incorrect. • The accuracy of the model outputs can only be as good as the accuracy of the inputs. Projections of key inputs relating to population and employment become very unreliable beyond 10 or 15 years. In addition to this, the transport sector is facing a potentially significant disruption from connected, automated vehicles that may have a significant impact on traffic growth. This has not been considered or modelled. • SMC is using an unpublished Value of Travel Time in the WestConnex traffic modelling. If the Value of Travel Time adopted is incorrect, then all outputs will be incorrect. • The induced demand of 0.3% is too low based on historical experience in Sydney. – The benefits counted from reduced traffic volumes on roads such as the existing M5 and the Eastern Distributor are unlikely to be realized due to real levels of induced demand. • The 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? • SMC refuses to release the traffic model and detailed analysis for independent unpaid peer review and scenario analysis.

Modelling scenarios are poorly defined and provide incomplete outputs. • The narrow boundaries of the areas of operational modelling mean the proponents have not fully assessed the Project's impacts on key strategic centres such as the Sydney Central Business District, Parramatta Road, the Anzac Bridge, the City West Link, the Crescent and the flow of traffic north to Drummoyne at the approaches to the Iron Cove Bridge where gridlock already occurs. – It is not understood why a mesoscopic modelling approach was not undertaken to gain a better understanding of impacts to the surrounding road network. – The modelling conclusions are internally inconsistent. There is an assumption that traffic would dissipate at the edge of the motorway with no negative impacts on the CBD, Mascot and Alexandria. However there is also an assumption that additional roads would be needed to cope with said traffic. • The EIS (including Appendix H) fails to provide traffic modelling outputs to assess impacts of the Project on CBD streets and intersections. Given the highly constrained and congested nature of the CBD, NSW Government policy focusses on reducing the number of cars in the CBD in favour of public transport, walking and cycling. The proponent should provide intersection performance results for the following intersections: – The ANZAC Bridge off-ramp to Allen Street/Botany Road – The Western Distributor off-ramp to Druit Street (buses) – The Western Distributor off-ramp to Bathurst Street – The Western Distributor off-ramp to King Street/Sussex Street – Gardeners Road and Botany Road – All intersections within the modelled area in the Sydney CBD. • 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 construction impact of the future Western Harbour Tunnel and Beaches Link entry and exit ramps connecting to City West Link/The Crescent has been assessed. The operational traffic impact of these ramps has not. This should be completed and publicly released before determination. There is no verifiable or understandable data to determine the veracity of claims of traffic generated by these other links.

Traffic modelling was insufficient to assess the full impacts of the project. • The underlying traffic modelling and outputs was insufficient to: – Demonstrate the need for the project. – Understand impacts of dispersed traffic on connecting roads, such as the Anzac Bridge, and whether they have available capacity to meet the predicted traffic discharge. Any congestion on exits has the capacity to negate all travel time savings to the exit point, given the small predicted benefits. • The strategic model (whole system) inputs traffic volumes that simply cannot be accommodated in the road interchanges and feeder routes. It is physically impossible to fit that amount of traffic on a road. • The 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. • Volumes on the main links (the trunks) cannot be as high as what is claimed in the EIS. It is physically untenable. This would suggest surface roads across the Inner West should also be modelled in detail to see how they will cope with the overflow. • The modelling shows the motorway exceeds reasonable operating limits in the peak in less than ten years.

Unreliable traffic projections snowball into compounding errors in the Project business case, design development and environmental assessment • 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. Evidence shows that the approach to traffic modelling in NSW is flawed • The traffic modelling approach applied in the EIS is commonly used in NSW. This approach has proven to be flawed. • 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) Figure 1 –Growth in Road Vehicle Kilometres Travelled 2001 – 2011

• 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)

This email was sent by David Chow 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 David provided an email address (red.mason9@gmail.com) which we included in the REPLY-TO field.

Please reply to David Chow at red.mason9@gmail.com.

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

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: FW: Submission Details

From: system@accelo.com On Behalf Of [REDACTED]
Sent: Monday, 16 October 2017 12:09:02 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [REDACTED]
Subject: Submission Details

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Name: [REDACTED]

Email: [REDACTED]

Address:

[REDACTED]

[REDACTED]

Content:

I object to the construction of this tunnel because:

1. It will increase traffic to inner west neighbourhoods at exit and entry points and beyond, isolating and fragmenting communities in the process.
2. There is no rationale for cutting across inner west suburbs. This will simply dump cars into Rozelle, Camperdown and St Peters, further concentrating and congesting traffic. These are not endpoints for destinations: this is creating a new mess. If such a tunnel were to be built, should it not extend to the existing harbour bridge tunnel, swing across to the Eastern Distributor tunnel and then extend to the airport and Port Botany - I thought this was the point - to mobilise traffic and trucks ACROSS the city, not simply to dump them in the inner west and then for them to travel into the city or port.
3. I also object that I have to comment on an EIS where the map is labelled as "indicative" and the final design has not yet been determined. This is extremely poor management and does not give any confidence in the process.

It is not too late to change this.

IP Address: [REDACTED]

Submission: Online Submission from [REDACTED] (object)

https://majorprojects.accelo.com/?action=view_activity&id=228013

Submission for Job: #7485 WestConnex M4-M5 Link

https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: FW: Submission Details

From: system@acelo.com On Behalf Of [REDACTED]
Sent: Monday, 16 October 2017 12:11:03 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [REDACTED]
Subject: Submission Details

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Name: [REDACTED]

Email: [REDACTED]

Address:

[REDACTED]

[REDACTED]

Content:

I object to this proposal on the following grounds:

The ventilation shafts are unfiltered posing a serious health risk for the local area, including children who are at Rozelle Public School and who play in local parks such as Easton Park.

The ventilation shafts proposed for Rozelle are imposing and unsightly for the local area

Increased noise and toxic pollution from the construction and operation of the link - negative impact on health of local residents

Increased traffic using rat runs and construction traffic on local roads - negative impact on local residents due to traffic danger and health risks. There are many children who live in the Rozelle and Lilyfield area who walk to and from school on the local roads

Noise and vibration of construction and operation - negative impacts on local residents health including increased stress and sleeplessness

I am very concerned about the tunnelling of 6 lanes that is going to take place underneath our property - we are at the bottom of the hill and are concerned of the impact to our lives by noise, pollution, vibration and risk of subsidence

I am concerned that Easton Park will be impacted by construction and traffic noise, plus pollution.

I oppose the this proposal due to the many negative impacts to my family when at home and to my school aged children who attend the local school.

I object to our local area being so negatively impacted by this proposal without adequate community consultation, traffic modelling and consideration of alternative public transport options.

IP Address: -

Submission: (object)

https://majorprojects.accelo.com/?action=view_activity&id=228015

Submission for Job: #7485 WestConnex M4-M5 Link

https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: FW: Submission Details

From: system@accelo.com On Behalf Of [REDACTED]
Sent: Monday, 16 October 2017 12:16:03 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:

I object to the M4-5 Link Option B construction site due to its proximity to Haberfield Public School and consequent increased noise, vibration, dust, traffic and disruption that will undoubtedly impact on the children, staff and local community, even beyond what has occurred since construction commenced on the new M4 project.

This extension of local construction activity beyond 2019 is intolerable for the community impacted.

The lack of clarity and certainty for the local community throughout the Westconnex project, especially regarding air quality monitoring and structured plans for remediation needs to be clearly addressed since these projects ignore international best practice policies regarding air filtration and heights of ventilation outlets which the community in Haberfield will eventually be surrounded by.

The disregard that the government and project builders have shown to the local community and also towards improving public transport options has been disappointing and disempowering.

IP Address: [REDACTED]

Submission: Online Submission from [REDACTED] (object)

https://majorprojects.accelo.com/?action=view_activity&id=228019

Submission for Job: #7485 WestConnex M4-M5 Link

https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: FW: Submission Details

From: system@acelo.com On Behalf Of [REDACTED]
Sent: Monday, 16 October 2017 12:36:03 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]
[REDACTED]

Content:

As an architect and a resident of Haberfield for over thirteen years we cannot accept the current scheme for Westconnex

M4 project is the best solution. Given the high concentration of residents, schools and other public amenities adjoining, the tall vertical ventilation stacks proposed are not the best option. Other technologies exist that can treat the emissions within the tunnels, so why not incorporate these? Cost? We're not aware of a cost comparison study being done to determine this or even made public. But, what price the health of the public?

At both the Haberfield and Rozelle sites, schools are within a few hundred metres. We understand the top of the Rozelle stacks will be at a similar level to Orange Grove public School and surrounding housing. These would have to have a significant negative health impact and raises questions about future compensation payouts. Wouldn't the cost of this and the stacks themselves be more than offset by the additional cost of in-tunnel air treatment?

Haberfield is a heritage conservation area of national, and to some extent, international significance - it was the first suburb designed and built based on the quarter acre model. While it may sound alarmist to label the demolition of so many houses in this area for Westconnex a national disgrace, it doesn't appear that the government or other planning bodies know or care about what they have done and intend to continue doing.

If nothing else please omit the ventilation stacks from the scheme and treat the traffic exhaust within the tunnels! It will be the act of a responsible government with a long term vision for a sustainable future - environmentally, economically and socially, all of which are interrelated. We want to see our children and future generations continue to live in the area.

IP Address: [REDACTED]

Submission: Online Submission from [REDACTED] (object)

https://majorprojects.accelo.com/?action=view_activity&id=228025

Submission for Job: #7485 WestConnex M4-M5 Link

https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

From: [REDACTED]
Sent: Mon, 16 Oct 2017 01:39:10 +0000
To: [REDACTED]
Subject: FW: Submission Details for Stephen Davern (object)

From: system@accelo.com On Behalf Of Stephen Davern
Sent: Monday, 16 October 2017 12:39:02 PM (UTC+10:00) Canberra, Melbourne, Sydney
[REDACTED]
Subject: Submission Details for Stephen Davern (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Stephen Davern
[REDACTED]

Address:
[REDACTED]

Rozelle, NSW
2039

Content:
I oppose the unfiltered exhaust stacks in Rozelle rail-yards and iron cove bridge.

[REDACTED]
Submission: Online Submission from Stephen Davern (object)
https://majorprojects.accelo.com/?action=view_activity&id=228030

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

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

From: [REDACTED]
Sent: Mon, 16 Oct 2017 01:47:24 +0000
To: [REDACTED]
Subject: FW: Submission Details for Giles Peach (object)

From: system@acelo.com On Behalf Of Giles Peach
Sent: Monday, 16 October 2017 12:41:07 PM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for Giles Peach (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Giles Peach
 [REDACTED]
 [REDACTED]

Ashfield, NSW
 2131

Content:

My comments concern the area around Bland Street, Alt Street and Parramatta road.

Plans and proposals have been drip fed to the community which does not allow for a holistic and complete assessment of the impact. Previous comments are not reflected in revised designs, and we have been told to treat any pictures that include trees, green spaces and street furniture as informative / aspirational only and that they may not be reflective of the final design.

It is not possible to look at the EIS and determine how the intersection will be built as the design regularly changes.

The area I refer to is primarily a residential area. When West Connex purchases Muirs car yard (the last remaining business in the area that buffers the road from residents) there will be no buffer between the road and residential houses.

Comment 1: How does West Connex propose to re-instate the buffer between the road and the new intersections and residents.

The Bland street crossing is a high traffic area as it links the communities of Ashfield and Haberfield.

Comment 2: How does West Connex propose to maintain and enhance the links between the integrated communities when the junction is delivered. Consideration should be given to pedestrian and cyclist crossing the new junction.

Comment 3: How has the design accounted for increased patronage of buses and provision in the design for future public transport options (e.g. light rail or trams).

[REDACTED]
Submission: Online Submission from Giles Peach (object)

https://majorprojects.accelo.com/?action=view_activity&id=228034

Submission for Job: #7485 WestConnex M4-M5 Link

https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

From: [REDACTED]
Sent: Mon, 16 Oct 2017 01:48:49 +0000
To: [REDACTED]
Subject: FW: Submission Details for Patrick McNamara (object)

From: system@accelo.com On Behalf Of Patrick McNamara
Sent: Monday, 16 October 2017 12:48:05 PM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for Patrick McNamara (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Patrick McNamara
 [REDACTED]

Address:
 [REDACTED]

Wedderburn, NSW
 2560

Content:
 To: NSW Planning & Environment
 Attn: Secretary
 Re: WestConnex M4-M5 Link

I wish to lodge a strong objection to the proposed M4-M5 link.

I believe the exhibited EIS is inadequate for the following reasons:

1. The effect of polluted air from the ventilation stacks on the adjacent residents has not been adequately modelled nor assessed and amounts to negligent misconduct by the consultants.
2. The traffic impact on resident safety at the entry and exit points has not been adequately modelled. RMS & DoP should require a higher standard of analysis.
3. The consideration of possible alternatives to this project is modest and smacks of agenda focus.
4. Public consultation was cursory and more like a PR exercise than a considerate consultation of the communities concerns.
5. There is financial cost/benefit analysis of the project. The cost blow outs of New M5 and M4 and collateral cost implications to local councils, residents and businesses has been horrendous and these concerns need to be factored into the EIS.

[REDACTED]
 Submission: Online Submission from Patrick McNamara (object)
https://majorprojects.accelo.com/?action=view_activity&id=228040

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

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: FW: Submission Details
Attachments: 228042_AA-6-Redfern to St Peters Station area_ Greenway High-Line Parkway_2017Oct16_1252.pdf, 228042_AA-7-WEST CONNEX + bio-diversity corridors pdf_2017Oct16_1252.pdf, 228042_Case_Study_Portrait_Barcelona_2017Oct16_1252.pdf

From: system@acelo.com On Behalf Of [REDACTED]
Sent: Monday, 16 October 2017 12:53:23 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]
[REDACTED]

Content:

I object to the West Connex Proposal as it FAILS to understand the LANDSCAPE SCALE " Sydney Green Grid " concept and how to intergrate both a large scale RAIL and Road Infrastructure project.

It is provided " in-confidence " and " commercial -in-confidence " .

if the " thinking of City of Sydney is " accepted" then the Primary solution is a Regional Bio-diversity Corridor spanning from Royal National Park to Lane Cove National Park, and to Kurringhail National Park

The ROAD INFRASTRUCTURE proposal may be " in-conflict " with the RAIL PROJECT or " designed to appear needed " but the Conceptual Example of a RAIL CORRIDOR above the M5 West (RMS toll Road) seems to suggest the WEST CONNEX M5 East Duplication is NOT NEEDED ?

Its based on CUMMUTER TRANSPORT NEED to CBD.

There is other ways to connect the M5 West to Parramatta Road corridor than the current proposal.

There is " local tunnel or Subway solutions " that can be designed to " de-congestion the NEWTOWN SHOPS area, and Cleveland Street, and re-direct CAR FLOW out of SYDNEY CBD.

EVEN the proposed BEACHES TUNNEL " concept design " should have a " RAIL OPTION " study to encourage " options " being studied in the same detail as the BEACHES TUNNEL proposal which has a budget of over \$ 50 million to " develop the case " .

The underground " interchange at Rozelle /Balmain is concerning even " conservative residents " in the area.

Its a LARGE underground structure. Tom Uren organised to BUY THE GLEBE ESTATE in the early 1870's to stop the RTA (RMS) building a wide " express way " thru Glebe.

NRMA support for the WEST CONNEX is understandable, but the OPTION to place FREIGHT on RAIL thru Sydney may need a " REVIEW of RAIL CAPACITY " ?

IP Address:

Submission: Online Submission from (object)

https://majorprojects.accelo.com/?action=view_activity&id=228042

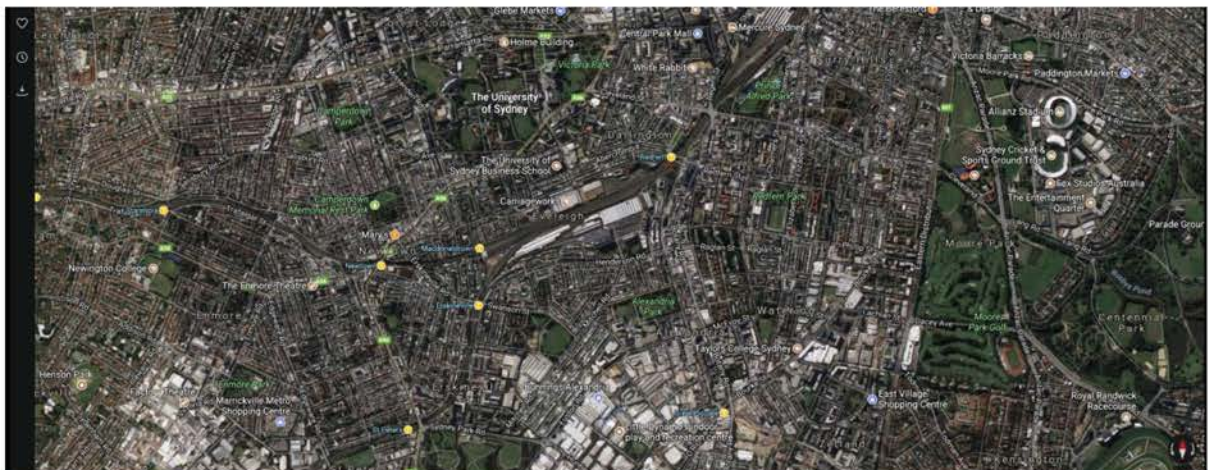
Submission for Job: #7485 WestConnex M4-M5 Link

https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

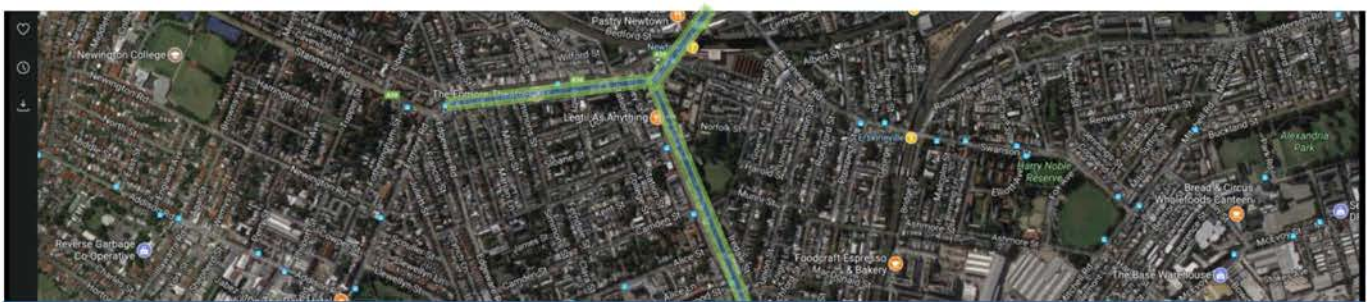
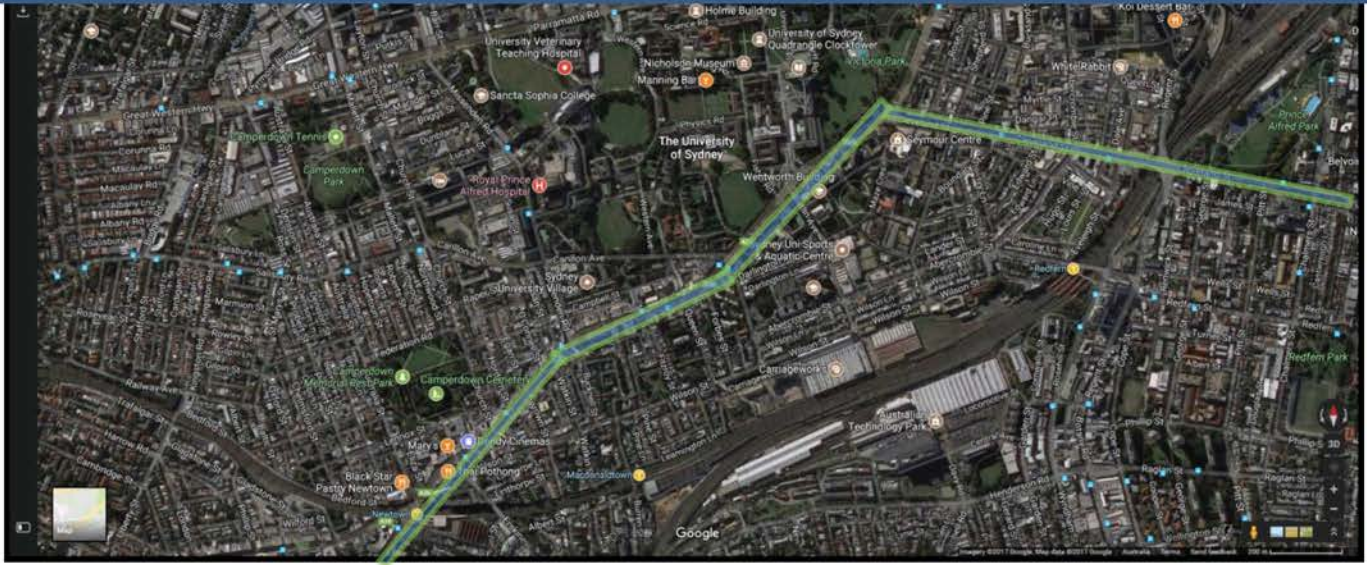
https://majorprojects.accelo.com/?action=view_site&id=3247

A Local Area Study of the Road Congestion in the NEWTOWN AREA may be extended to the GLEBE and Ultimo areas. To see if it is possible to reduce car use in the area, and allow an easier thru traffic route thru the regional area, so the TRAFFIC can bi-pass the Central CBD area with LIGHT RAIL running down the GEORGE STREET from CENTRAL to Circular Quay.



The Existing Rail Lines flow thru Redfern to St Peters and divide off before Newtown so having a STATION built at Sydney Uni is a short " branch Line away ". It was considered before the WATERLOO GREEN STATION was selected.

A Subway Roadway is an option between City Road, Victoria Park and King Street, St Peters the STUDY could extend to Cleveland Street, and then assess traffic on Parramatta Road thru Broadway turning left to Fish Markets.



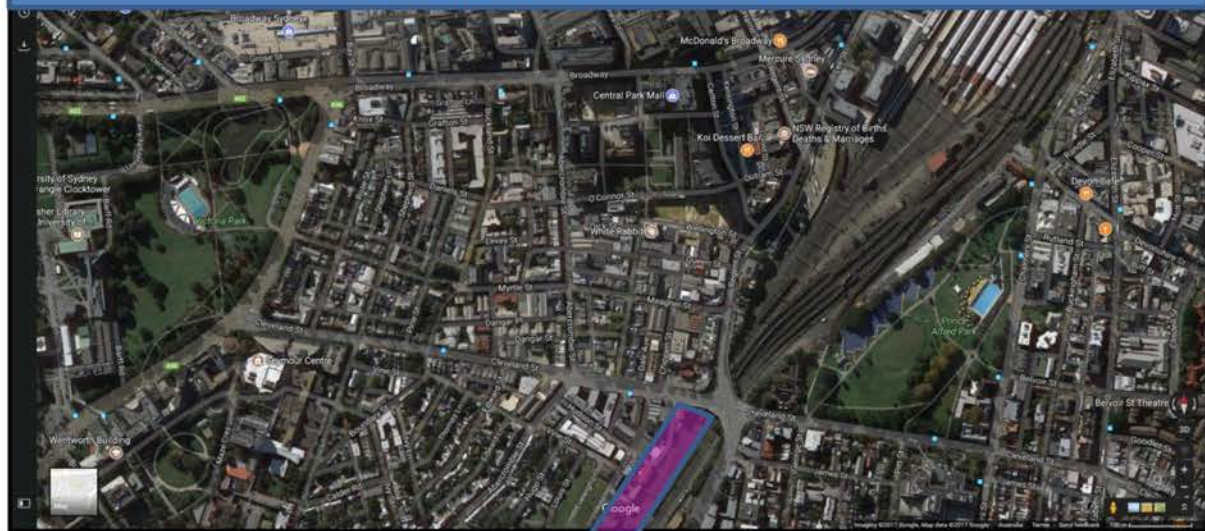
From Sydney Park a SUBWAY is proposed to be built along King Street to City Road Newtown to Sydney Uni (or a diversion road designed) This may result in a electric bicycle-way street at GROUND LEVEL.





REDFERN - WATERLOO AREA (above)

CHIPPENDALE AREA (below)



- The Light Pink = High-Line Park over Rail Corridor to Cleveland Street
- This may be utilized for “ First Peoples Space “ in a Cultural Area / Cultural Space Concept in Redfern. This may “ evolve “ and “ use First People Dream – Time Stories “ to create a unique High-Line Park.
- This is just an option at Present using the “ air-space “ above the Rail Lines in Redfern Area.



NEWTOWN STATION Area - Light Blue area is “ study for subway thru Newtown Shops “ .

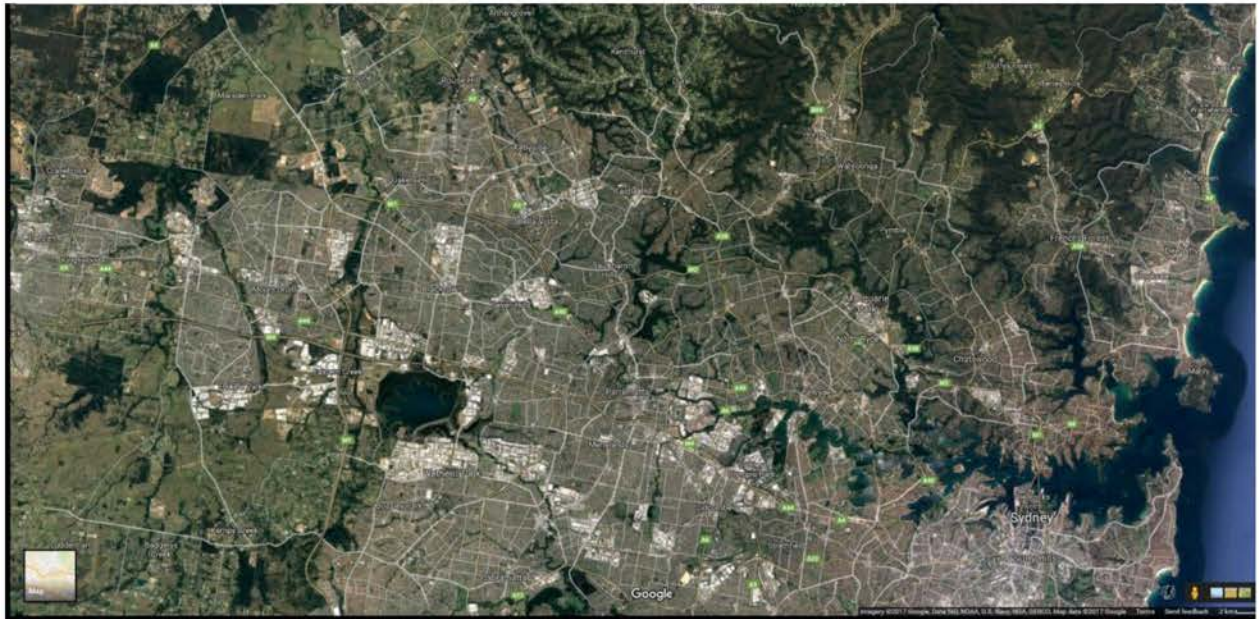


St PETERS STATION Area. - Light Blue area is “ study for subway thru Newtown Shops “ .

- Light Green is the “ conceptual Greenway extending to Royal National Park, from Sydney Park.

WEST CONNEX + SYDNEY METRO

+ Regional Bio-Diversity Corridors (Revised Sydney Green Grid)



“ Critical Thinking “ and “ innovation “ is a New University Degree at UTS

which has the Institute of Sustainable Futures.

What is missing is the Bio-diversity Grade Corridor thru Metro Sydney as part of a revised version of the Sydney Green Grid (which won a National ALAI award last year, but failed to design a viable bio-diversity Corridor over the Greater Sydney Metro area) So why is the Office of Government Architect “ unable to design viable Ecological Corridors ? Daniel Bennett ALAI President talks of a “ SOLUTION that transcends the “ Silo thinking “ within State Govt. The “ SILO Thinking “ focus of RMS road projects in late 1960’s was “ WIDE MULTI-LANE highways thru the Inner City now converted to ROAD TUNNELS but if the Population Target is not 5 million but 8 million the Transport Solution may need “ Critical Thinking “ and “ innovation “ to adapt to an 80% increase in population. The UTS Course Leader in the “Critical Thinking Course “ favoured a FAST TRAIN for the East Coast than a Western Sydney Airport.

In trying to “ conceptually design “ a Lane Cove to Royal National Park bio-diversity corridor it is obvious that there is NO Lane Cove National Park in the Inner West and Inner South West of Sydney, so using the AIR-SPACE above the RAIL or ROAD (freeway or Toll-road) network is the “ next best solution “ using “ innovation “ in landscape construction that allows “ Green Roofs “ to be vegetated.

The “ demolish 5 km of Houses and Factories option was rejected by the NSW OEH staffer in the Threatened Species Unit some years ago, so the other alternative was to use a TWO LEVEL solution within the Inner West Light Rail Corridor . Light Rail at Ground Level + a Bio-diversity Corridor above of 10 m to 30 m wide.

The “ funding “ may come from a “ Value Capture “ on the 80% increase in Population in Sydney predicted by former NSW Planning Minister, Rob Stokes MP, and mentioned by Daniel Bennett, President (or Past President) of ALAI, in his essay on the Sydney Green Grid (attached file) .

So the revised SYDNEY GREEN GRID can (if the West Connex was abandoned for South and M4 to M5 sections as proposed by Clover Moore in Appendix 3) extend to SYDNEY PARK from Royal National Park, and from Royal National Park to Lane Cove, but needs the “ abandoned Inner West Greenway “ to be revised and built. Based on Ecologist expertise the width for a Regional Bio-diversity Corridor is not 3 m wide and dis-continuous, but 30 m wide if space is available. The Bird Flight Path of 100 m wide (Small and big birds) is already part of the Inner West Greenway Concept proposal.

INTERNATIONAL CITIES are building RAIL LINES in Traffic Congested Cities.

In Bangladesh, they have a 160 million population, and the country is not as rich as Australia, but they have 100 million Mobile Phone users, that can use the Mobile Phone as an “ office –less “ banking system. Daka the main city has a large population and Traffic Congestion, so it has a Japanese Railway Enterprise installing a subway system for that city, which will “ speed up “ travel “ thru the city.

In Ho Chi Minh city in Vietnam, they are building a subway system to reduce the traffic congestion issues.

So the capacity of an electric car movement system, is not as great as a Train Line Capacity.

Listening to a Boeing Aircraft Executive years ago, talking to his Australian mate (probably both Vietnam Veterans) as they were walking to the Harbourside Viewing of the Sydney to Hobart Yacht Race, it was OBVIOUS that RAIL FREIGHT was a business that saved Boeing from going broke when aircraft manufacture was low.

So the Lesson here is that branch lines were sold in the US and local Freight Operators were able to “ intergrate “ with road freight locally. So in SYDNEY the FREIGHT LINES are “ restricted “ by the Passenger Commuter Train Lines. So assessing a RAIL FREIGHT solution “ upgrade “ may be more sensible but “ initially difficult “ to achieve “ critical thinking “ solutions and “ innovation “ .

The alternative, is to look at the Swedish model, that has 100 % electrified Freight (using renewable Power) and Electric Overhead Power supply for Road Haulage, routes.

So increasing the RAIL FREIGHT capacity between Sydney and Newcastle could be achieved by a NEW second TRAIN LINE available for Commuter Trains leaving the other for 24 hour Freight use.

These are “ complex transport network issues “ which are difficult to assess and understand at “ first glance “ . But in Kiama, a Freight Train went past with 30 carriages behind a train, so that is a simple example. Coal Export uses Trains from Coal Mine to Sea Port.

In Sydney the Freight is a large Import flow from Port Botany outwards (to intermodal Terminals ?) , so the media reports favour RAIL FREIGHT distribution systems.

THE ALTERNATIVE RAIL SOLUTION – for the Sydenham to Bankstown Line

As Clover Moore, Mayor of City of Sydney has opposed the West Connex project, and proposed her own “re-design”, looking at the merit of “re-locating” the Sydenham to Bankstown Line seemed a “kids play” method to increase the capacity of Public Transport regionally, by 100 % plus (with option of express train from Liverpool to St Peters area) .

So the SYDNEY METRO train system is re-directed to a an ELEVATED TRAIN ROUTE from St Peters to Liverpool using the existing train line to WOLLI Creek area then using the Air-space above the M5 West. The reduction in “demand” for the M5 East Tunnel may be “quantified” by Transport Experts at Inner West Council and City of Sydney .

Transport Planner Ken Welsh at Inner West Council, may be able to evaluate the “impact” that extra train capacity will have, and if the SPEED of Train Travel has any impact. This is important as in Japan there is different speeds for even the “FAST TRAIN” with all-stop Fast Train and Express Fast Train Trips (costing more) .

So the “critics” of Sydney Metro may analyse the Travel Speeds achievable with only one track each way, thus preventing “express higher speed trips” along the route.

When travelling to Blue Mountains last summer, a group of European (German + Swiss) 20ish passengers, started talking about the train being slow, and in German the train would be arriving, in Blue Mountains (here it's a 2 hour trip) but they imagined the arrival when the train was at Mount Druitt. They were correct, if travelling on a FAST TRAIN in Germany (that may travel at 250 kph or 350 kph) instead of 80 kph.

So the “Critics” may wish to “by-pass the City” stops to get to Liverpool “the NEXT GREAT CITY” from North-West Sydney Region.

To achieve that “wish list” a re-routing of the proposed Sydney Metro (or its alternative vision) could travel thru St Peters Station to Sydney Uni Station then to Ultimo, and Pymont (Fish Markets) White Bay, and then go to NORTH WEST SYDNEY AREA via the VICTORIA ROAD route.

This would also “reduce the need” to drive cars on Victoria Road route , and have a task to “quantify” the impact by Transport Planner at Inner West Council ??? .

This “ALLOWS” a North West to South West Train Line to Utilise the “SMART DOUBLE DECKER” train system (which is just a concept on a desk-top at present), that in Germany is a “innovation concept” to increase capacity of TRAIN LINE.

The SYDNEY METRO (current State Govt concept) is proposed to operate a 2 minute intervals at peak, and at 4 minute intervals when the Castle Hill and Cherrybrook stations open.

By looking at the European Example, they have a Network of FAST TRAINS between major destinations. This reduces the need to commute by Airplane, in Europe.

There is an Express Train in the late afternoon to Blacktown and Penrith which is a Fast Trip compared to an all-stops trip time. This type of RAIL OPERATION requires a FAST TRAIN LINE to “bypass trips the stop at all Stations” .

THE WEST CONNEX – and the SYDNEY GREEN GRID

In Japan there are a number of Cities between Tokyo and Kyoto, but in Sydney the TRAIN NETWORK upgrade is based on MATRIX but RADIAL NETWORK focussing on SYDNEY CBD,

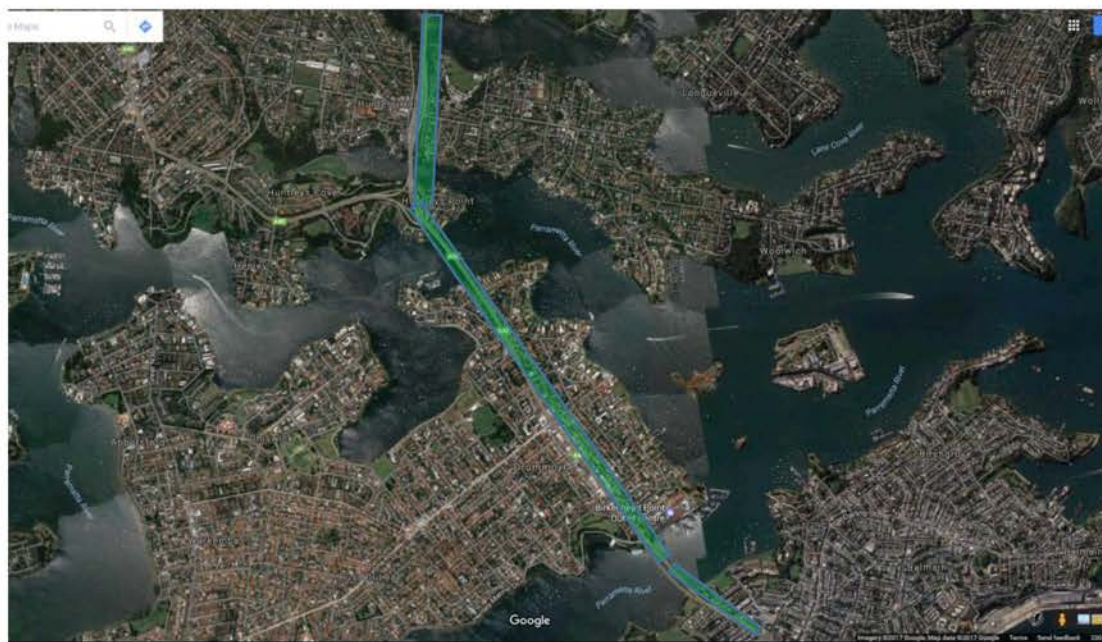
This is true with both the SYDNEY METRO and WEST CONNEX “concept design” instead of focussing “on a City of Cities” with Parramatta the “NEXT GREAT CITY” complete with a UNESCO World Heritage Precinct at North Parramatta. (instead of allowing URBAN GROWTH NSW to destroy the Tourism Potential of the Heritage Precinct). This is achieved by “re-locating the Urban Uplift” to the CBD of Parramatta (or ?) (out of the UNESCO Heritage Precinct area, by increasing the “Height Limit with the CBD, as the Tallest Buildings are now 95 storeys in Parramatta CBD area.

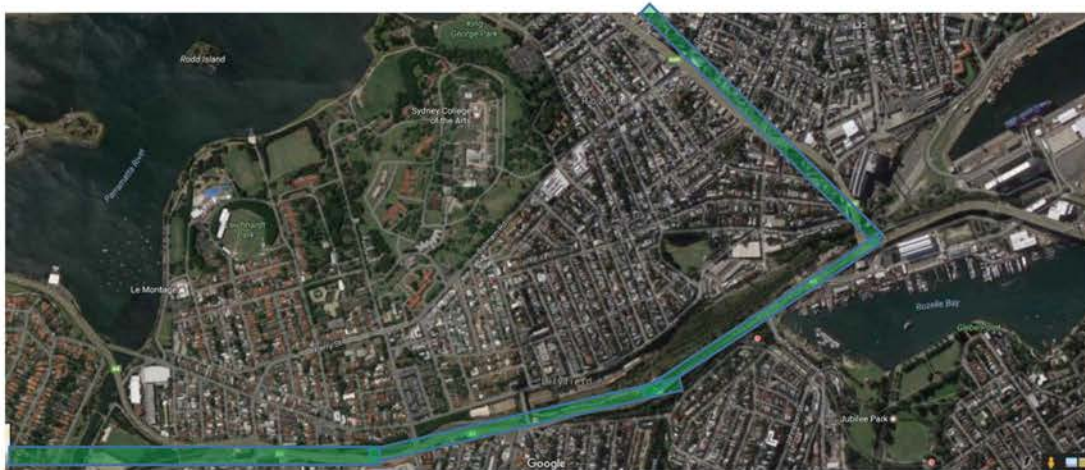
To construct a Regional Bio-diversity Corridor from Lane Cove National Park to Royal National Park is a Challenge when there is NO Linear National Park between both National Parks .

So looking at the Existing RMS and RAIL CORRIDORS to “TRANSEND the SILO THINKING” by providing an “intergrated solution” in the SAME CORRIDOR space, is part of the “CRITICAL THINKING”

The Lane Cove to White Bay to Hawthorn Canal area that needs “CRITICAL THINKING” and “Innovation” to overcome the LACK of a National Park nearby for the Bio-diversity Route .

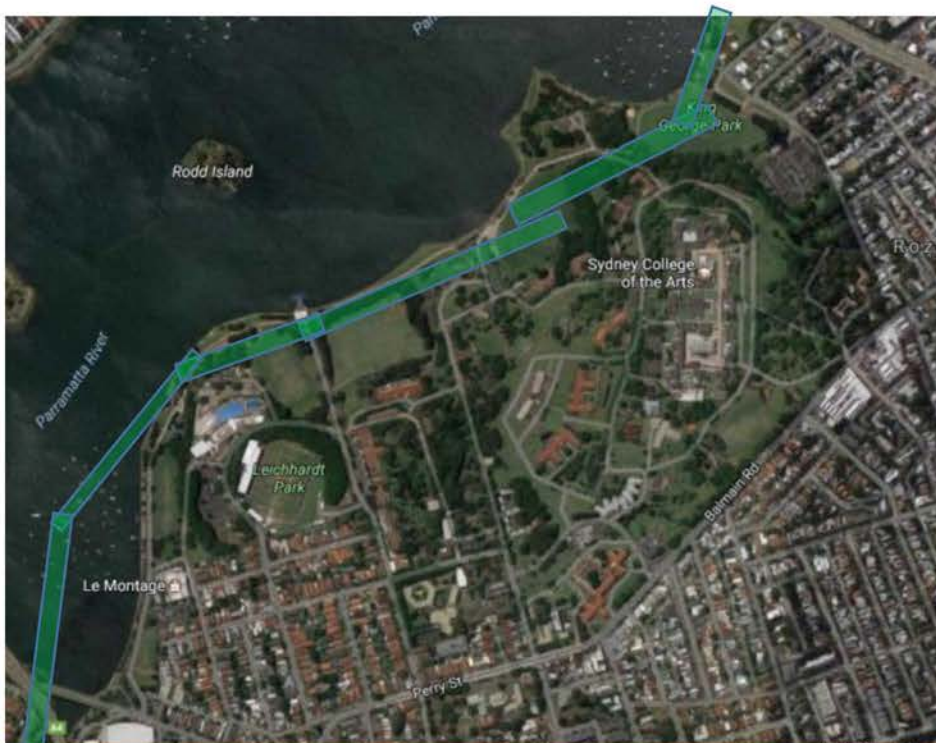
***A tunnel for the North West Rail line runs under Lane Cove National Park, and a TUNNEL runs under Lane Cove National Park for the Regional Toll Road . So going from a URBAN AREA to an URBAN AREA is OK, but intergrating the ROAD + RAIL infrastructure CORRIDOR seems “TO HARD”
? = why ???***





But linking the Lane Cove National Park to Royal National Park, with an above ground " Bio-diversity Corridor " requires " critical thinking ". The " Green Roof " solution is unlikely to be acceptable in the Lane Cove the Iron Cove Bridge region, so undergrounding the RMS road-way south of Gladesville Bridge is the " Next OPTION " .

South of Iron Cove Bridge putting the TOLL ROAD (WEST CONNEX in a tunnel to White Bay is already proposed in the WEST CONNEX project. So this allows the Victoria Road Corridor to become a "Vegetated GREEN STREET " perhaps a bio-diversity corridor with exclusion fence at the sides, with Walking and Bicycle Pathways at the Sides of the Street.



THE " THRU CALLAN PARK " Bio-diversity Corridor may be impractical so the ALTERNATIVE using the " GREEN ROOF " over the City West Link Road is suggested. Finding alternative Space for Sports Fields is Regionally Important.

Due to "complications in the Land-use at Callan Park , including Sports Fields in Callan Park " the ability to use Callan Park as a Bio-diversity Corridor is " not assumed possible " but it is in the Masterplan for Callan Park.

The Rozelle Goods Yard area is proposed to be assessed in detail for SPORTS FIELDS to be " re-located from Callan Park, including the " Cricket Field Proposal " on the large Sports Field space east of Wharf Road, Callan Park. There is SPACE for an Olympic Standard SKATE PARK to be built " above the Lilyfield Light Rail Service Depot " between Lilyfield Road and City West Link Roadway.



- Imagine Sports Fields from Balmain Road to Victoria Road ? between Lilyfield Road and City West Link Road. ?? Could Smaller Court Sports be played below the MAIN GROUNDS at Street Level
- ALTERNATIVE REGIONAL Bio-Diversity Corridor becomes a " GREEN ROOF " above the City West Link Road from Victoria Road to Hawthorn Canal
- (Linking up with the Inner West Light Rail Corridor to Dulwich Hill) .
- It then travels thru Marrickville Golf Course and over Cooks River.
- To Wolli Creek Bushland Area.
- It then uses a " GREEN ROOF " vegetated Bio-Diversity Corridor over the " M5 West " RMS Corridor. This avoids the Option to use " Demolition of Housing and Factories to create the Biodiversity Corridor.
- The option to Demolish Housing is avoided in the Iron Cove to Dulwich Hill area by using a " Green Roof " with Native Plants to feed the Fauna, with a width of 30 m wide if possible.
- In addition a " ELEVATED RAIL LINE " is proposed to be constructed above the Green Roof (Bio-diversity Corridor)
- LINKING THE M4 EAST to the M5 West via the existing RMS road network is proposed.
- To avoid the cost of the M4 to M5 Linking Tunnel an UPGRADE of the Alternative was proposed
- Linking the M5 West to ASHFIELD AREA, by a Surface Road " Uplift " or Tunnel is the regional option to the M4 to M5 linking Tunnel.

Clover Moore, Lord Mayor of Sydney City.

Clover Moore in her own "alternative to West Connex" suggests a upgrade of the King Georges Road

"We need to rethink the need, shape and scale of WestConnex and consider what could be done that is better economically for NSW," the council's report says.

*One of those flaws is that, though the initial justification for WestConnex was to improve the ability for cars and trucks to access Sydney Airport and Port Botany, the motorway as planned runs about [eight kilometres from the port](#), and a mooted connection remains at least six years and extra billions of dollars away. **The council, therefore, proposes halting work on the current duplication of the M5 East.***

This would allow a proposed motorway interchange at St Peters, on the site of a former dump that has been remediated by the Sydney Motorway Corporation, to be used for housing. The City of Sydney council says about 13,000 dwellings could be built on the site.

Instead of duplicating the M5 East, the City of Sydney suggests introducing a toll on that road for the first time, which might reduce traffic by about 20 per cent, and removing the extra fees charged for catching the train to and from Sydney Airport.

To "soften" the impact of the toll, the council suggests compensating M5 motorists who have registered for cash back with a free Opal card for a year.

The council suggests scrapping the M4-M5 link from St Peters to Rozelle, a section of motorway the state government SAYS IS THE MOST IMPORTANT ELEMENT OF WestConnex.

The WestConnex interchange site at St Peters would be sold for housing, train fares to Sydney Airport slashed, and work on a new rail line between central Sydney and Parramatta accelerated under the City of Sydney council's alternative to the \$16.8 billion motorway.

The council's proposal also involves a significant upgrade to King Georges Road to substitute for the WestConnex tunnel under the inner west, and potentially smaller road tunnels linking Sydney's existing motorway network direct to Sydney Airport and the Cross City Tunnel.

The BLUE MOUNTAINS residents

They mentioned the increasing FREIGHT from Western NSW going over the Blue Mountains, to Port Botany and the ability of Neither the ROAD or RAIL service to cope west of Katoomba. The Electric train Line ends soon after Katoomba, and does Orange / Bathurst area. So a FASTER TRAIN Line to Orange / Bathurst may be good for Freight and Commuter Transport.

If this was in Europe, an EU Parliament could have granted funds to build a "key route" infrastructure project. This has happened with the Munich to Milan Euro-Rail FAST TRAIN

that has a tunnel at the Base of the SWISS ALPS with train speed of 250 kph for Freight and 350 hph for Passenger Travel.

So these people may be grateful if the Blue Mountains area got an “ Uplift in RAIL or ROAD infrastructure “ with the potential abandonment of the M5 to M4 Link Tunnel (stage 3) .

CENTRAL COAST residents

There is Some support in the Orange area, for a faster train to the “ Big City “ or a Low Carbon Plane Ride.

A similar outcome may be supported by Hunter Regional Development Authority who have a long-term Aim of a FAST TRAIN line between Newcastle and Sydney. A Bridge from Sydney to the Central Coast could cost “billions“ and increase the Freight Line capacity by using the “ existing Rail Corridor “ for FREIGHT more over the Whole Day. If it was a tunnel infrastructure project it could be a long tunnel just like the M4 to M5 Tunnel Link, but the purpose vastly different focussing on Rail Passenger Capacity and Freight Rail capacity between Newcastle and Sydney.

APPENDIX 1 ::

LETTER TO NSW TRANSPORT MINISTER Autumn 2017

To :: Andrew Constance MP, Minister for Transport

Office@Constance.Minister.NSW.gov.au

Re :: **Alternative Train Route to the Proposed SYDENAM TO BANKSTOWN METRO TRAIN LINE
= St Peter's to Liverpool via the M5 West.**

The attached file provides reference to the GREEN ROOF bio-diversity corridor running from Lane Cove National Park to Royal National Park, and then how it extends east at Wolli Creek Bushland to Sydney Park, St Peters. This is where the GREEN ROOF idea evolved, without a regional bushland corridor like Lane Cove National Park in the Regional Area.

The TRANSPORT COMPONENT is added later. The overall funding for " GREEN INFRASTRUCTURE " is flawed, but a large scale Urban Uplift proposal can provide funds ? when 35,000 plus dwellings are proposed in the Sydenham to Bankstown area (or alternative solution) .

So as the SYDNEY METRO proposal spread from North-West to South-West and includes " Urban Growth along the route" then the GREEN INFRASTRUCTURE " value capture ? " solution potentially covers the same area.

I have listened to a retired RAIL ENGINEER talk about the South West Train line, and the lack of RAIL CORRIDOR WIDTH in the Sydenham to Bankstown area. Because building an extra line would be " more sensible " than providing LESS CAPACITY than currently available was his solution.

So I suggest an ELEVATED RAIL LINE built over the M5 West Corridor.

The existing TRAIN LINE is retained, and the additional capacity created between St Peter's Station and Liverpool.

The TRAIN can be ELEVATED over the M5 WEST and also between St Peter's Station and Wolli Creek area.

The option is available to have an " express route to Liverpool, so the overall travel time from Cecil Hills to CBD is reduced to 60 mins or less (instead of current 1.5 hours, source = Train Commuter).

So if the TRAIN TRIP was faster the " Demand " for the M5 East Tunnel for cars may decrease ?

The Federal Govt is advocating the " 30 minute city " concept so a 30 min trip from Liverpool to CBD may be an achievable target, with a faster train.

It was late last year travelling to Katoomba that I discussed Train Trip times with a group of Europeans, who were with the German ICE TRAINS. Those trains travel at 250 kph or 350 kph so the Germans were saying they should be in Blue Mountains when they were only near Mount Druitt.

The " slower driverless train solution " is not universally accepted as " best option " . There is a Vancouver Driverless Train, but its critics say a Light Rail Solution is cheaper to operate.

So linking the St Peter's to Liverpool route to the City of Sydney " wish list " Stations of East Green Square, Ultimo, Pyrmont, and White Bay is a future option.

When this is investigated further, and the Willoughby Council General Manager's comments about a future Northern Beaches TRAIN LINE from Chatswood Area (in Rail Air-Space Inquiry) are considered (perhaps in long-term)

The Northern Beaches MP, Jason Falinski MP has already advocated for a TRAIN to NORTHERN BEACHES in 2016.

DOES the NORTH WEST RAIL LINE need an alternative route from Epping / Ryde to White Bay /CBD to allow capacity for the Northern Beaches Route to operate thru Sydney Harbour Bridge (or Harbour tunnel option ?)

So this is anticipated to be Victoria Road Corridor using a range of options to select the better option. This includes ELEVATED TRAIN LINE (or tunnel ?) , Subway Light Rail, Surface Light Rail ? and noise emission considered in the analysis of rolling stock, as the evidence shows the Light Rail is quiet above ground, and it has rubber clad steel wheels.

The above ground solution can be visually enhanced with vegetation to ' blend into the landscape'

The RAIL LINE between Carlingford/ Epping/ Ryde area and Parramatta can then be “reviewed “or UPGRADED from a Light Rail Line to an ELEVATED LINE with a GREEN SPACE below (Linear Landscape for Humans ?) or should it be “ Green Space for Bio-diversity ? “ (Tunnel is an Option ?).

This TRAIN ROUTE may be “ lower cost “ than a tunnel solution based on Vancouver advice for Sky-Train in Vancouver, and in NORTH PARRAMATTA use a “ VIA DUCT design like in the GLEBE area for the Light Rail to pass over Jubilee Park”, or place the TRAIN in TUNNEL in Parramatta and North Parramatta due to UNESCO WORLD HERITAGE items being in the area.

To complete the “LOOP “ consider how a TRAIN (or new TRAIN LINE ?) is constructed between Liverpool and Parramatta CBD with one option being ELEVATED with a Linear Park below.

The proposed WEST METRO is not fully supported by Balmain MP Jamie Parker who prefers an all-stops Train along Parramatta Road. So to accommodate that idea, a 27,000 capacity (or 40,000 capacity SUBWAY LIGHT RAIL) is proposed between WHITE BAY and Parramatta CBD. Thus it can operate both all-stops and EXPRESS SERVICES. Part of the 40,000 capacity each way per hour can consider the M4 West Corridor West of Strathfield, to avoid Tunnel construction costs). In busy China Cities the Light Rail is in Subways.

In Seattle, USA the Light Rail is 80 % elevated or in subway.

South-West Train Services may need “ review” as a comment outside Customs House spoke of the benefits of a faster train to Southern Highlands area. This seems to echo a “ Terrigal Vision “ for a 30 minute trip to Sydney CBD, by Train (or is it Fast Ferry ?) .

APPENDIX 2 ::

2 Rozelle Against West Connex Group – They have a list of “ issues” including the EXHAUST STACK design and filtration standards.

The overall “ Interchange Tunnel “ network under Balmain/Rozelle has prompted even the “ conservative “ Balmain Shores “ residents Group to put in a submission

The “ alternative “ is to use a MORE EFFICIENT transport system to deal with an expected population increase of 80%, and so this suggests “ MASS TRANSIT” an Driverless Cars and Trucks are part of the Answer. Mass Transit moving 40,000 in one lane is more space efficient than a Car with one passenger. This is the “ Peak Time “ problem of Traffic Congestion. So increasing the “ MASS TRANSIT “ solution for PEAK TIME may reduce the DEMAND. This is achieved by a consumption TOLL on entering the GREATER CBD AREA.

3 In the Rozelle Area the MOTORWAY TUNNEL solution may have HEALTH PROBLEMS due to LACK of SPACE to re-locate SPORTS FIELDS outside of CALLAN PARK to Rozelle Goods Yard area. The GROUP SPORT DEMAND including Cricket, Football (Soccer), Tennis, Basketball and Netball, Baseball, Skateboarding and Skateboard Slalom Runs, and Half-

pipes. This could be all the existing Sports Played in Callan Park, plus Skateboarding and In-line Skating

- 4 So the "filtration" solution needs to "solve the active sport field" use of Ground Level space, The Sports Fields can be built over the Light Rail Depot at Lilyfield and other Rail uses, and Industrail Land use like a Timber Yard.*
- 5 The "air quality" for native Fauna may also be important, but likely ignored by the EIS documentation.*
- 6 In Europe, and in China is Networks of FAST TRAINS designed to allow Fast Travel between Centres without using "Polluting Planes" to achieve the movement. This option is just a "Dream" in Australia.*

John Bradfield the Engineer who designed the Sydney Harbour Bridge, also designed an Electric Train Network for the whole of Metro Sydney Area, so the Steam Train Smoke was a "Thing of the Past". Now the "Coal-fired" power stations are pollution sources to be converted to renewable power supply. Battery-Electric bicycles, battery electric cars (TESLA and BMW) are being produced commercially in 2017.

So with Sydney Growing Out, the Network of RAIL may need to "GROW OUT" also with FASTER TRAINS to "outer suburbs" ?? instead of a FOCUS on ROAD TUNNELS in the INNER CITY area to move FREIGHT because the PORT of SYDNEY was re-located to PORT BOTANY without Solving the FREIGHT TRANSPORT SOLUTION with RAIL SOLUTIONS of adequate capacity.

The Battery Powered devices "transition" may open-up a variety of Transport Solutions that do not need "roads" just tracks over grasslands below. (and this is a "design element" in FUTURE STREETS exhibition outside of Customs House , Circular Quay, Oct 2017. SEATTLE has 80 % of its LIGHT RAIL NETWORK elevated or in Subway. So reducing PEAK DEMAND for car lane capacity, may be a solution for Military Road Mosman ??

APPENDIX 3 ::

JUNE 5 2017

SAVE

Clover Moore reveals City of Sydney's radical proposal to overhaul WestConnex



Jacob Saulwick

The WestConnex interchange site at St Peters would be sold for housing, train fares to Sydney Airport slashed, and work on a new rail line between central Sydney and Parramatta accelerated under the City of Sydney council's alternative to the \$16.8 billion motorway.

The council's proposal also involves a significant upgrade to King Georges Road to substitute for the WestConnex tunnel under the inner west, and potentially smaller road tunnels linking Sydney's existing motorway network direct to Sydney Airport and the Cross City Tunnel.



Clover Moore is pushing the proposal to highlight what she sees as significant flaws with WestConnex. Photo: James Brickwood

With the Gladys Berejiklian government seemingly wedded to its plans for WestConnex, the council's alternative proposal is unlikely to amount to more than an academic exercise.

But lord mayor Clover Moore is nevertheless pushing the proposal in part to highlight what the council sees as significant flaws in the government's fast-growing motorway vision for Sydney



NSW Premier Gladys Berejiklian has dismissed the plan from the City of Sydney. Photo: Nick Moir

"We need to rethink the need, shape and scale of WestConnex and consider what could be done that is better economically for NSW," the council's report says.

One of those flaws is that, though the initial justification for WestConnex was to improve the ability for cars and trucks to access Sydney Airport and Port Botany, the motorway as planned runs about

eight kilometres from the port, and a mooted connection remains at least six years and extra billions of dollars away.

The council, therefore, proposes halting work on the current duplication of the M5 East.

This would allow a proposed motorway interchange at St Peters, on the site of a former dump that has been remediated by the Sydney Motorway Corporation, to be used for housing. The City of Sydney council says about 13,000 dwellings could be built on the site.

Instead of duplicating the M5 East, the City of Sydney suggests introducing a toll on that road for the first time, which might reduce traffic by about 20 per cent, and removing the extra fees charged for catching the train to and from Sydney Airport.

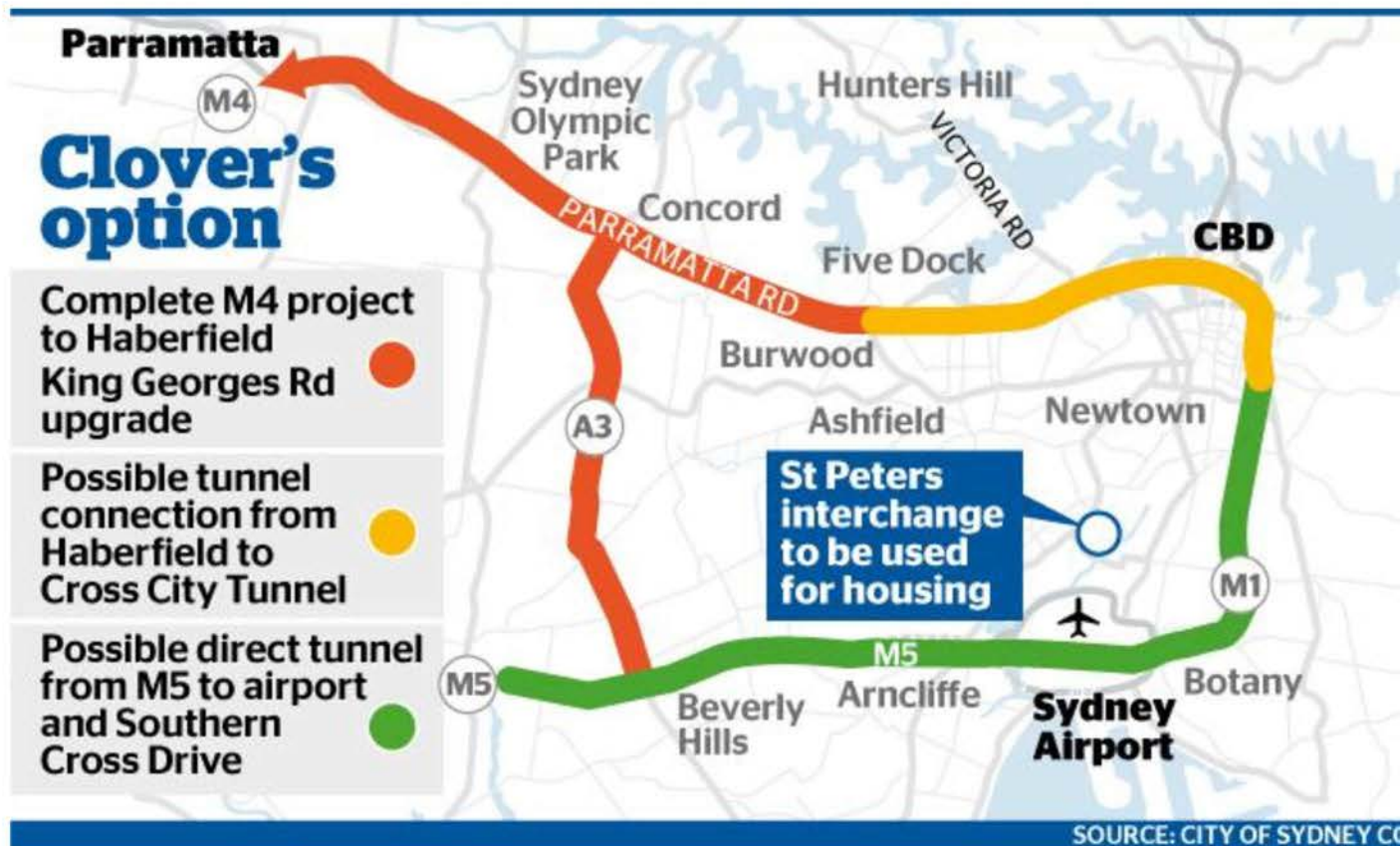
To "soften" the impact of the toll, the council suggests compensating M5 motorists who have registered for cash back with a free Opal card for a year.

The council also says is the most important element of suggests scrapping the M4-M5 link from St Peters to Rozelle, a section of motorway the state government WestConnex.

Instead, the council proposes a series of upgrades to King Georges Road. King Georges Road, which Infrastructure Australia has said is the [second-worst road corridor in the country](#), would constitute an alternative north-south route across inner-western Sydney suburbs.

The council's alternative vision does include a few motorways. It accepts the extension of the M4 motorway to Haberfield. But it says any further extension of that road should be delayed until a new metro rail link is built between central Sydney and Parramatta. If needed, the M4 could be extended in a smaller tunnel to connect to the under-utilised Cross City Tunnel.

And the council is also open another M5 East tunnel – but a smaller tunnel that connects from the M5 directly to Port Botany and Southern Cross Drive. The plans, however, will almost certainly fall on deaf ears.



"Our concern is that the costs for this project are spiralling out of control and they will continue to do so," Cr Moore wrote to Premier Gladys Berejiklian in April, while also briefing her on the council's alternative.

The council has tallied the road projects planned to be added to WestConnex at \$45 billion.

Ms Berejiklian replied that her government's experts estimated the council's plan would cost potentially double the amount of the \$7 billion M4-M5 Link and airport and port connection. The council disputes Ms Berejiklian's analysis.

Asked on Monday if she would consider an alternative route for WestConnex, Ms Berejiklian said: "I respect people have strong opinions on this project but the City of Sydney does not represent greater western Sydney where the public will benefit from this massive road project."

The council, however, will continue to oppose the project.

"Other global cities have stopped pursuing motorway projects of the magnitude and cost of WestConnex," it says.

FUTURE STREETS

Applying the "Driverless Bus" technology to a Congested Military Road in Peak Morning Travel, we get a 2,000 per car movement, over 4 lanes in the morning, to compress into much less lane width, but only if the one passenger per vehicle "standard on 2017" is "transformed" into 6 passengers seated bus travel (per former car space with one person each car) perhaps 12 per Driverless Bus (if standing passengers included) . So this "transformation" produces a Capacity increase of 6* times or 12* times the current capacity. This needs more attention to "Detail Social Studies" to see how it can be achieved, instead of building a "BEACHES TUNNEL" project for "faster Car travel?". $2000 * 6 = 12,000$ people per hour or 24,000 using standing people in Driverless bus. Then there is the "LIGHT RAIL OPTION" that can deliver 27,000 per hour in just 2 lanes in same direction. The Electric Bicycle may be the "FUTURE STREET" solution for travel between Home or Office and the TRAIN STATION, if Local Busses are too infrequent, and Volunteer Drivers unavailable.

So applying the "Future Street" technology to the West Connex Road Tunnel Network may provide a different "demand map" for the West Connex project ?? Then add the option of increased Public Transport on Victoria Road and M5 West (with an elevated Train Line Concept on both ROADWAYS the "demand map" for WEST CONNEX may decrease at "PEAK TRAVEL" periods.

The "Smart Metering" devices used for Electricity Supply demand "Tracking + Supply Levelling" could be "adapted to Car Use" data mapping ".

ALTERNATIVE TRANSPORT INFRASTRUCTURE

CLOVER MOORE , LORD MAYOR OF CITY OF SYDNEY

3 April 2017

LETTER FROM CLOVER MOORE. MAYOR OF SYDNEY.

TO :: NAME WITHHELD

Alternative Transport Infrastructure

I refer to your letter suggesting alternative transport infrastructure for Sydney, and thank you for sharing your research. I'm sorry for the delay in responding.

I agree a public transport alternative to WestConnex is very desirable, and your proposed rail line linking central Sydney, the inner west, and Liverpool and Campbelltown in M5 West airspace is one example of such an alternative. Major cities around the world are making public transport their priority, not toll roads, and Sydney needs to do the same.

WestConnex provides a 1950s response that doesn't match our 21st century transport needs. It has been recognised there is a fundamental problem with trying to ease congestion by increasing road capacity – the extra demand eventually negates any initial benefit. A more effective solution

would be to improve public transport so that more people use it instead of driving, and leave more space on the roads for people who need to drive.

The City continues to advocate for public transport investment across the Sydney metropolitan area as an alternative to road investment that benefits private vehicles.

Regarding your proposed biodiversity corridor that would include a cycleway, the City is already investing in increasing the cycling network and the open space across our local government area. We're working to make cycling a safe and popular transport choice by creating a network of safe and connected bike paths that take people where they need to go. We have now completed 12.5km of safe, separated cycleways and have several more projects under way.

We're also working with neighbouring councils on the Inner Sydney Regional Bike Network – 10 regional routes to improve connections between popular destinations including the city centre, universities, parks and recreational facilities, and employment locations. The routes are a combination

of existing on-road bike lanes, paths shared with pedestrians and, where possible, separated cycleways. Council adopted our Open Spaces Sport and Recreation Needs Study in December 2016, which gives directions on increasing linked open spaces through site acquisition, dedication of land from large development sites, and advocating for after-hours sharing of public space such as in school grounds.

Our six-monthly bike counts at 100 intersections throughout our local government area show bike trips have doubled in the City since we started building cycleways six years ago. More than 7000 people now ride to work in the city centre each day – the equivalent of 116 full buses or seven Sydney trains.

Particularly in the city centre, the City is working hard to reduce traffic overall and make conditions more attractive for people walking and cycling. Walking accounts for 92% of trips in the city centre and we're doing extensive work to make it easier to walk around our city. In 2015, Council adopted the City of Sydney Walking Strategy and Action Plan. This aims to make walking quick, convenient, easy, inviting, safe and interesting – it includes targets to improve pedestrian safety and reduce delay in walking times, particularly at intersections. You can read the strategy at bit.ly/1cQFKMd. We're also

working with the NSW Government to implement pedestrian improvements throughout the city centre.

Regarding your 'Greenway' proposal along the Inner West Light Rail corridor, the City would support the concept, but the land included is mostly outside the City of Sydney local government area. You may wish to contact the Inner West Council about this proposal at council@innerwest.nsw.gov.au.

In fact all your proposals, while similar in concept to actions the City is already taking, are on a metropolitan scale and so the NSW Government is, as you noted, the appropriate level of government

to consider them. The City's priorities generally have to focus on what we can achieve at a local government level, and while we might support any proposals you advocate to the government, we're already committed to the City's own actions and investments in alternative transport infrastructure.

If you would like to speak with a Council officer about the City's transport priorities, you can contact Bryony Cooper, Executive Manager – City Access and Transport, on 9265 9333 or at bcooper@cityofsydney.nsw.gov.au.

Yours sincerely

Clover Moore

Lord Mayor of Sydney



GREEN SURGE

BARCELONA, SPAIN

*Case Study City Portrait;
part of a GREEN SURGE study on urban green
infrastructure planning and governance in 20
European cities*

In cooperation with:

**Joan Lloret Corbella, Sara Udina Armengol, Hector Rodal Lopez;
Barcelona City Council**



**Main Author: Rieke Hansen
Technische Universität München (TUM)**

1.0 • February 5th 2015



INTRODUCTION

This case study portrait is part of a series of 20 case studies on urban green infrastructure planning and governance in European cities, undertaken in the course of the GREEN SURGE project. GREEN SURGE is a trans-national research project funded through the European Union's 7th Framework Programme. GREEN SURGE is an acronym for "Green Infrastructure and Urban Biodiversity for Sustainable Urban Development and the Green Economy". The project is identifying, developing and testing ways of connecting green spaces, biodiversity, people and the green economy, in order to meet the major urban challenges related to, e.g., climate change adaptation, demographic changes, human health and well-being.

Each portraits has the following content:

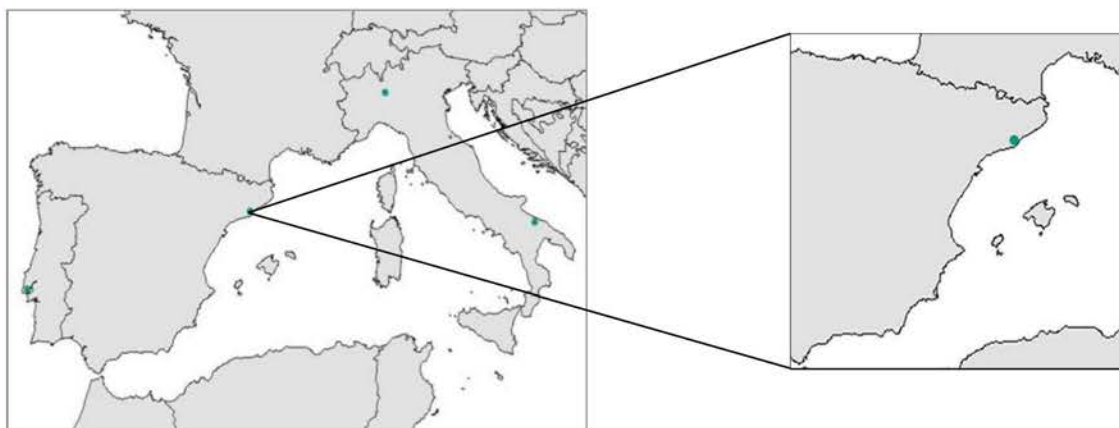
- **INTRODUCTION** – which contains location and green structure maps as well as basic information on the city-region (core city and larger urban zone).
- **URBAN AND REGIONAL PLANNING CHARACTERISTICS** – which describes the main characteristics of the planning system including instruments for the protection and enhancement of green space and objectives, achievements and challenges in urban green space planning
- **EXPERIENCES WITH INNOVATIVE GOVERNANCE PRACTICES** – which outlines how, in the views of selected actors, 'traditional' government-driven steering of green space planning and management on the one hand, and emerging forms of governance with a greater role for non-government actors on the other, play out in different cities.
- **URBAN GREEN INFRASTRUCTURE (UGI) THEMES AND STRATEGIES** – which considers the main themes about planning and how this relates to the concept of UGI as well as policy concepts. Furthermore, implementation and evaluation of planning instruments are discussed
- **URBAN GREEN SPACES: LINKAGES BETWEEN BIODIVERSITY AND CULTURE** – which is about the linkages between cultural diversity and biological diversity and how these impact on urban green spaces and urban green structures. Urban biocultural diversity is a recent concept emphasizing the links between biological diversity and cultural diversity. Research and policy directed at biocultural diversity can focus on the roles of ethnic or other groups, the role of a great range of cultural practices (which may or may not be connected to certain groups), and to physical objects or species bearing a relationship with specific cultural-historical practices.
- **CONCLUSION** to wrap up the main findings

A report with all case studies and more detailed background information can be found on the project's website <http://greensurge.eu>.

1) INTRODUCTION: Facts and Figures

Core city	Barcelona	Biogeographic region	Mediterranean
Region	Metropolitan Area of Barcelona	Planning family	Mediterranean/ Urbanism
Area <ul style="list-style-type: none"> ▪ Core city ▪ Larger urban zone 	9 458 ha 179 405 ha	Population (2012) <ul style="list-style-type: none"> ▪ Core city ▪ Larger urban zone 	1 620 943 4 917 162
Average annual population change rate (1990-2012; Core city)	-0.23	Public recreational green space per capita (2006, Core city; m² per inhabitants)	2.96 ¹

Location

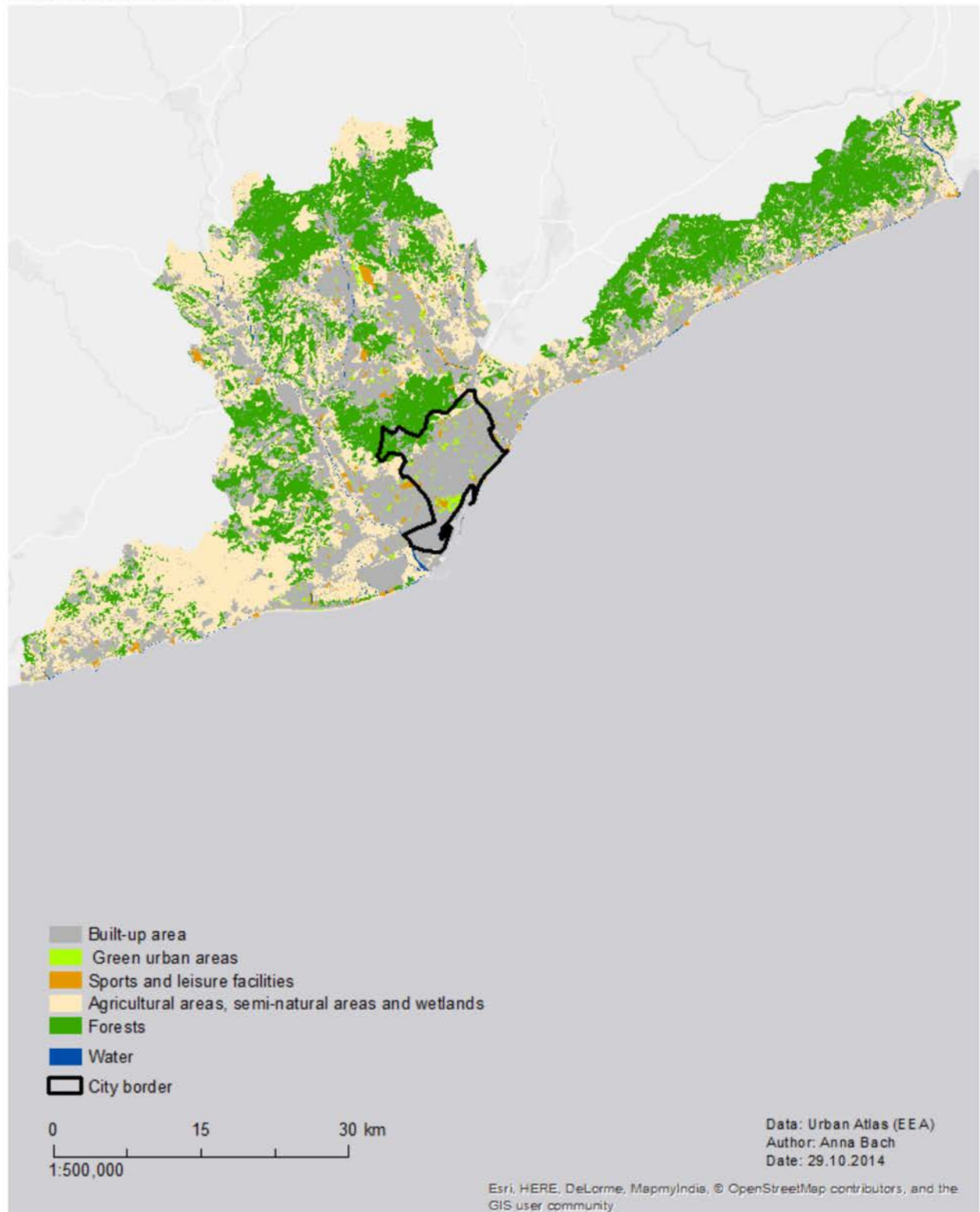


Barcelona is the capital city of the autonomous community of Catalonia and Spain's second largest city. It is situated in the north of Spain between the coast of the Mediterranean Sea and the Serra de Collserola mountain range. Barcelona is one of the most densely populated cities of Europe and one of the largest metropolitan areas along the Mediterranean Sea accommodating about 5 million inhabitants (Barcelona Activa and Barcelona City Council 2014). Within its dense urban fabric, public green spaces sum up to approximately 1,100 ha; the Collserola mountain range covers additional 1,700 ha of the city area and more than 8,000 ha in total (Green Infrastructure and Biodiversity Plan 2013).

The city is a major cultural and economic centre in South-western Europe and a popular international tourist destination. Barcelona registers a foreign population of 17.4%, mostly originating from American countries, and is considered a multicultural and welcoming city. The port of Barcelona represents an important international transport hub (Barcelona Activa and Barcelona City Council 2014).

¹ For the Green Infrastructure and Biodiversity Plan 6.82 m² of urban green within the densely built city area and 11.33 m² including Collserola have been calculated. These deviations can be explained by the restricted definition of public accessible urban green space in the Urban Atlas.

Map of Larger Urban Zone



2) URBAN AND REGIONAL PLANNING CHARACTERISTICS

General description of the planning system

Regional and urban planning for Barcelona and its surroundings are defined in the Urban Planning Law of Catalonia. At the regional level the regional government of Catalonia (Generalitat de Catalunya) and the Metropolitan Area of Barcelona are responsible for spatial planning. The most important planning instrument at this level is the Metropolitan Master Plan of 1976, which is legally binding for Barcelona and 35 other municipalities. The Metropolitan Master Plan should eventually become substituted by the Directive Metropolitan Plan, which is in a very early stage of elaboration.

The Metropolitan Master Plan is also influential at the city level. Other instruments for city-wide planning are binding Planning Regulations and Local Ordinances. The departments dealing with city-wide planning are Hàbitat Urbà (Urban Habitat) and Gerència Adjunta d'Urbanisme (Urban Planning Direction). The Generalitat de Catalunya also supervises city-level planning with regard to modifications of the Metropolitan Master Plan.

Instruments for the protection and enhancement of urban green space

In regard to urban green space, the Metropolitan Master Plan and the Urban Planning Law of Catalonia are the most relevant instruments for the metropolitan area. Additionally, areas for nature protection are developed and managed by administrative bodies. The Collserola mountain range is legally protected by a Declaration as Natural Park (Decret 146/2010 Parc Natural de la Serra de Collserola) and is planned and managed by the Consortium of Collserola Natural Park. Barcelona's rivers, Besòs and Llobregat, are managed by two consortia that represent local councils for urban development and infrastructure and cooperate in planning and management in the river areas.

At the city level, mandatory regulations for the Municipality of Barcelona for green space protection and enhancement are also provided by the Metropolitan Master Plan and the Urban Planning Law. The Urban Habitat (Hàbitat Urbà) department is responsible for green space planning and has recently launched the Green Infrastructure and Biodiversity Plan. This strategic plan sets out the long-term actions that are needed to attain green infrastructure and promote the provision of environmental and social functions.

Objectives, achievements and challenges in urban green space planning

According to the Green Infrastructure and Biodiversity Plan, the preservation and enhancement of the natural heritage of the city and biodiversity conservation are important objectives. This includes conservation, renaturalisation of the city and the creation of new green space, especially in regard to enhancing the connectivity of green infrastructure. The Green Infrastructure and Biodiversity Plan itself is seen as a major achievement and as a helpful tool for communication among departments involved in green infrastructure, planning and urbanisation projects.

To increase connectivity several ambitious projects are being developed, such as "Les Portes de Collserola" (Gates to Collserola Forest Regional Park), which aims to connect the forested area of Collserola with Barcelona. Within the city the Diagonal Verda (Green Diagonal Avenue) is a linear park across the eastern part of Barcelona that will connect the Nus de la Trinitat, a major highway interchange in northern Barcelona, to the waterfront. These projects are considered as major achievements by city officials, but their realization is discerned as challenging because Barcelona is such a dense and compact city. Barcelona's density also increases challenges such as adapting to climate change and accommodating society's increasing demand for green space.



Barcelona's major challenges: Increasing connectivity among green spaces is a challenging task with the dense city structure. The Collserola mountain range has been hardly accessible so far to the city's citizens (photo: Rieke Hansen, 2013).



Barcelona's major achievements (from left to right): The city undertakes actions to create a network of green corridors and to protect and enhance biodiversity. The Green Infrastructure and Biodiversity Plan builds the foundation for this process. -- The Park of Cami Comtal is one of the envisioned corridors (both images: Ajuntament de Barcelona).

3) EXPERIENCES WITH INNOVATIVE GOVERNANCE PRACTICES

Government ideas and practices regarding participation

Barcelona's city officials perceive an increasing role of participation and rising interest of citizens because they seem to feel more connected with the city and to have a demand for more green space.

One example of a participatory process that focussed on experts and organized stakeholder groups is the drafting of the Green Infrastructure and Biodiversity Plan. Companies, guilds, professionals and associations, as well as experts from universities and research centres contributed mainly as consultants during one session where the city council shared an evaluation of the state of green infrastructure and the aims and objectives, while different stakeholders made suggestions. The results of this session were used to draw the plan of action.

City representatives see potential for increasing participation of non-governmental organisations, business community representatives and individual citizens. So far, neighbourhood associations have been mainly involved in planning processes and in the management of some green spaces. Through districts and their participation programmes the City Council also agrees with neighbouring inhabitants upon the redevelopment of green spaces, such as Parc de l'Espanya Industrial or Turó Park.

Local initiatives

There are a few active participatory initiatives run by and for specific groups in Barcelona. In the Apropa't als Parcs programme, initiated by the City Council, parks are used by schools for learning about sustainability. The maintenance of a green space in Horta Guinardó is undertaken by persons with mental disorders and groups at risk of social exclusion. An example of citizen participation is the analysis and evaluation of the status quo of green areas in the neighbourhood of Tres Torres. A group of residents conducted this analysis and presented a series of proposals for improvement.

Supporting and hindering factors in participation as perceived by city officials

According to city officials, participation would be supported by more tools that enable actors to influence decisions. Non-governmental actors would need to receive more power to not only influence the management and maintenance of urban green space but also to actually influence its use. According to the interviewee, the balance between intensive use of green space and its maintenance and conservation is most difficult to achieve.

Examples of initiatives coming from local stakeholders

Pla BUIITS

To give life to vacant areas through temporary use and enable activities with little investment the city administration developed the Plan of Vacant Urban Plots (Pla BUIITS). Non-governmental actors suggested uses for vacant areas owned by the City Council. The best initiative for each plot was selected and afterwards the organisations took over the management. Examples of uses include community gardens.

BioBlitzBcn

BioBlitzBcn is an event exploring the flora and fauna of the city in which interested persons may participate. Over a period of 24 hours, scientists studying specific groups of flora and fauna identify all the organisms that participating citizens can find in a given area.

The BioBlitzBcn takes place annually since 2009. The event is organised by the City Council, Barcelona's natural science museum and the museum's friends group. It also involves partners such as local universities and nature protection organisations.



La ferroviària in Sant Andreu (photo: Ajuntament de Barcelona)



BioBlitzBcn (photo: Ajuntament de Barcelona, Jordi Cassanyes)

4) URBAN GREEN INFRASTRUCTURE (UGI) THEMES AND STRATEGIES

Main themes related to urban green space

The main themes for green space planning in the Barcelona Metropolitan Region are the preservation of agricultural land and environmental protection, for example, as defined in the Protection Plan for the Llobregat Delta. Additionally, forest preservation and enhanced connectivity of forested areas are major topics of the Collserola Natural Park Statement.

Concerning the dense city area the Green Infrastructure and Biodiversity Plan mentions themes including preserving and enhancing the natural heritage of the city and its biodiversity as well as increasing green infrastructure and ensuring its connectivity. Furthermore, the benefits for humans are represented by the aim of securing the provision of social and environmental services from green infrastructure and biodiversity. The plan also aims at increasing the valuation of these services to society through education. It additionally aims at increasing resilience.

Future themes are how to consider economic bonuses and create incentives for promoting the "greening" of urban areas.

Barcelona Green Infrastructure and Biodiversity Plan 2020

Original title: Pla del verd i de la biodiversitat de Barcelona 2020

Date: 2013

Responsible department(s): Urban Habitat, Section Environment and Urban Services

Spatial scale: city

Legal status: non-binding but approved by politics

Main themes related to urban green space

- Conservation of natural heritage and biodiversity
- Connectivity of green infrastructure
- Provision of social and environmental services and their valuation
- Resilience

Understanding of UGI and representation of UGI principles

Barcelona's Green Infrastructure and Biodiversity Plan is based on the concept of UGI. In this plan green infrastructure is described as "a network of spaces with public or private agricultural or landscaped natural vegetation, a multi-purpose resource providing ecological, environmental, social and economic services. These services are enhanced further when connectivity of green infrastructure is achieved." Increasing connectivity through green corridors is one of the main objectives of the plan's strategy. Furthermore, the idea of multifunctionality is considered and illustrated in the form of environmental and sociocultural services that different types of urban green space such as forests, parks, or vegetable gardens provide. The integration of UGI with other urban infrastructures is also mentioned.

Parallels with GREEN-SURGE policy concepts

- Biodiversity
- Ecosystem services

Implementation and evaluation

City officials consider the implementation and evaluation of green space planning to be working quite well. The Green Infrastructure and Biodiversity Plan contains a chapter entitled "Strategic lines and actions", which suggests several programmes for implementation of the Strategy. The plan also contains a catalogue of actions but no details on their implementation. For the green corridors, such as Park of Cami Comtal, separate plans have been drafted. Furthermore, a monitoring system shall be established based on a set of indicators.

City officials consider integrating urban green into a densely built urban environment and obtaining ownership of the required land as the most challenging factors of green space implementation. Additional hindering factors for plan implementation are based on economic reasons. So, for the creation of connections and corridors between different green spaces political support and willingness are essential. Additional support for plan implementation stems from the increased demand for green space for recreational purposes.

5) URBAN GREEN SPACES: LINKAGES BETWEEN BIODIVERSITY AND CULTURE

Views of what Biocultural Diversity is referring to and how it is addressed in policy

The concept of biocultural diversity has not been considered in Barcelona so far. In regard to biodiversity, the Green Infrastructure and Biodiversity Plan emphasises the protection of native species as well as the creation of a green space network that promotes the city's local flora and fauna. The creation of a green network is considered crucial for enabling connectivity and promoting diversity.

From a cultural perspective, city officials see the city as very hospitable and open, with many different cultures living together. They do not see any effects of social fragmentation, so there has been no need to focus on cultural diversity in planning and policy. Consequently, no specific attention is given to managing urban green spaces such as parks in terms of the needs of specific groups of users, e.g. with respect to age, health, or ethnicity.

Some parks still maintain their historic design and are considered as heritage objects.

Bioculturally significant places

Most green spaces attract mainly the neighbours of the area. Parks in areas with a high percentage of immigrants are more often used by certain ethnic groups. Pou de la Figuera, for example, attracts mainly people with South American roots and is mostly used for outdoor sports, social interaction and urban gardening.

Other parks represent major tourist attractions. In Park Güell the high numbers of tourists lead to more regulation, such as fencing the park and establishing a ticket entrance. Parc de la Ciutadella is one of the most intensively used parks in Barcelona and concentrates all kinds of users from different cultures. It is an historic park that maintains its original design and holds festivals, fairs and all kinds of sports events.



Pou de la Figuera (photo: CC BY 2.0, Flickr.com, Enric Bach, 2008)



Parc de la Ciutadella (photo: CC BY-NC-ND 2.0, Flickr.com, Annelies, 2010)



Park Güell (photo: CC BY-NC-SA 2.0, Flickr.com, sim00n, 2007)

6) CONCLUSION

For Barcelona and the metropolitan area statutory planning is mainly based on the Metropolitan Master Plan and the Urban Planning Law of Catalonia. Furthermore, landscape areas of high environmental value, such as the Collserola mountain range or river deltas, are protected and developed through declarations or plans. At city level the Green Infrastructure and Biodiversity Plan 2020 aims at improving the connectivity of urban green spaces through corridors and at protecting the city's biodiversity. One of the major challenges is to connect the Collserola mountain range with the city and make it accessible.

In regard to governance, city officials perceive increasing interest of citizens in participation, but so far the focus has been on neighbourhood associations and selected stakeholder groups. An example of cooperation between the city administration and non-governmental actors is the Plan of Vacant Urban Plots. Initiatives could submit suggestions for interim uses on vacant areas and after a selection process their objectives could be realized.

In terms of themes and strategies in green space planning, the Green Infrastructure and Biodiversity Plan shares themes considered as important in the GREEN SURGE project. The plan is based on the concept of urban green infrastructure and also includes the concept of ecosystem services. Major aims are improving connectivity and increasing the provision of ecosystem services.

The concept of biocultural diversity is not applied by city officials. Biodiversity is considered in the Green Infrastructure and Biodiversity Plan, while cultural diversity is not perceived as a theme for plan or policy development because the city of Barcelona is hospitable and already many different cultures use urban green space without critical tensions.

LINKS AND REFERENCES

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- **Barcelona Metropolitan Area:** <http://www.amb.cat/s/home.html>
- **City of Barcelona:** <http://www.bcn.cat/en/>
- **Parc de Collserola:** <http://www.parcnaturalcollserola.cat/>
- **Gates to Collserola Forest Regional Park (Les Portes de Collserola):** <http://w1.bcn.cat/portesdecollserola/>
- **Consorti del Besòs:** <http://www.consorcibesos.cat/index.php?page=home>
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- **Biogeographic region:** EEA (2012). *Biogeographic regions in Europe*. Available from www.eea.europa.eu/data-and-maps/figures/biogeographical-regions-in-europe-1; accessed 18/09/2014.
- **Area core city and larger urban zone:** *Urban Atlas*.
- **Population core city and larger urban zone** (2012 or latest): mainly *Urban Audit*. Note: in a few cases the population numbers have been provided by researchers based on statistical data
- **Average annual population change rate** (Core city; 1990-2012 or similar): calculated $\left[\frac{(100 * \text{population number last year} / \text{population number first year}) - 100}{(\text{last year} - \text{first year})} \right]$ based on *Urban Audit*.
- **Public recreational green space** (Core city; m² per inhabitants; 2006): based on *Urban Audit* and *Urban Atlas*. *Urban Atlas* defines urban green space as “public green areas for predominantly recreational use”. Peri-urban natural areas, such as forests and agricultural land, are mapped as green urban areas only in certain cases. In general, peri-urban green areas are not counted. Private green and blue areas are also not included. Further, green spaces with less than 250 m² are not mapped as well. This leads to deviation with per capita green space values used by city officials
- **Location map:** based on Natural Earth (2014): *1:10m Cultural Vectors*. Available from www.naturalearthdata.com/downloads/10m-cultural-vectors/; accessed 22/09/2014.
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- **Apropa't als Parcs:** <http://www.sostenibilitatbcn.cat/index.php/apropat>; accessed 03.11.2014
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- **Diagonal Verda** (Green Diagonal Avenue): <http://diagonalverdabcn.blogspot.de/>; accessed 03.11.2014

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- **Collserola Natural Park Statement:** Diari Oficial de la Generalitat de Catalunya (2010): Decret 146/2010 Parc Natural de la Serra de Collserola. Available from <https://www.gencat.cat/eadop/imatges/5745/10287138.pdf>; accessed 03.11.2014
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- **Urban Planning Law of Catalonia:** *Text refós de la llei d'urbanisme 1/2010, i llei 3/2012*. Available from http://www20.gencat.cat/docs/ptop/Home/01_Departament/Normativa%20i%20documentacio/Documentacio/Territori_mobilitat/Urbanisme/publicacions/Text%20refos%20i%20Reglament%20de%20la%20Llei-%20durbanisme/QL-94Urbanisme2.pdf; accessed 03.11.2014

Acknowledgements

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From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: FW: Submission Details for [REDACTED] (object)
Attachments: 228046_161202-NSWCSE-koala-report_2017Oct16_1303.pdf, 228046_AA-6-Redfern to St Peters Station area_ Greenway High-Line Parkway_2017Oct16_1303.pdf, 228046_AA-7-WEST CONNEX + bio-diversity corridors pdf_2017Oct16_1303.pdf, 228046_AA-Lane Cove National Park to Royal National Park_ word story-_2017Oct16_1303.pdf

From: system@accelo.com On Behalf Of [REDACTED]
Sent: Monday, 16 October 2017 1:04:36 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [REDACTED]
Subject: Submission Details for [REDACTED] (object)

Confidentiality Requested: no

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Disclosable Political Donation: no

Name: [REDACTED]

Email: [REDACTED]

Address:
[REDACTED]
[REDACTED]

Content:
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IP Address: [REDACTED]
Submission: Online Submission from [REDACTED] (object)
https://majorprojects.accelo.com/?action=view_activity&id=228046

Submission for Job: #7485 WestConnex M4-M5 Link
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**Chief Scientist
& Engineer**

Report of the Independent Review into the Decline of Koala Populations in Key Areas of NSW

NSW Chief Scientist & Engineer

December 2016



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Chief Scientist & Engineer

The Hon Mark Speakman SC MP
Minister for the Environment
Minister for Heritage
Assistant Minister for Planning
52 Martin Place
SYDNEY NSW 2000

Dear Minister

Report - Independent Review into the Decline of Koala Populations in Key Areas of NSW

In March 2016, you asked me to establish and chair a committee to undertake a review into the decline of koala populations in key areas of NSW.

I am pleased to present my report as Chair of the Koala Advisory Committee. This report is intended to provide the basis from which a koala strategy for NSW can be prepared.

The report outlines some of the major issues requiring attention if we are to ensure that healthy koala populations can continue to persist. I make 11 recommendations that can form the basis for a state-wide strategy.

I would like to acknowledge the time and expertise provided by the members of the Committee established for this review, which included two independent experts and their colleagues, and officers from a range of NSW Government agencies.

Yours sincerely

Digitally signed by
Mary O'Kane
Date: 2016.12.02
11:01:35 +11'00'

Mary O'Kane
Chief Scientist & Engineer
2 December 2016

EXECUTIVE SUMMARY

Koalas are one of Australia's most iconic animals, recognisable around the world. However, koala populations are under increasing pressure. The NSW and Commonwealth Governments listed the koala as threatened in 1992 and 2012 respectively. In 2012, Adams-Hosking et al. (2016) estimated that Australia had approximately 330,000 koalas, with an estimated 36,000 in NSW. For NSW, this study estimated a 26% decline over the past three koala generations (15-21 years) and the next three generations.

In March 2016 the Minister for the Environment asked the Chief Scientist & Engineer to conduct an independent review into the decline of koala populations in key areas of NSW. A Koala Advisory Committee was established to provide advice to this review. This report is intended to provide the basis for preparing a whole-of-government koala strategy for NSW.

Many of the threats to koala populations are well known, for example, habitat loss and fragmentation, vehicle strike, dog attack, fire, disease, drought and heatwave. However, the scale and impact of particular threats vary across the state. There is still much to learn about many of these existing threats and the most effective actions to mitigate them. However, we can say that many of these threats are unlikely to abate and several will be intensified or exacerbated by climate change.

Government and the community have a range of actions available for managing these threats including legislative and regulatory controls, the requirements of the planning system, incentives for private conservation, community initiatives, and management of the reserve estate and other public land. However, outcomes are not always aligned across different tenures and land uses. Often, the effective use of management tools is hampered by lack of adequate data and information to inform decisions.

This report recommends that the objective of a NSW koala strategy should be to stabilise and then start to increase koala numbers.

This will require actions to protect, rehabilitate and connect koala habitat, as well as a range of actions to manage and mitigate threats to koalas. Some threats to koalas are widespread and others vary in intensity between bioregions. Therefore, some threats will require state-wide action, for example, through appropriate policy settings and investment in data collection, while others need to be addressed on the ground regionally or locally.

An important finding of this review is that it may not be possible to ensure all koala populations continue to persist in all locations. There are some populations where government and community action can help secure ongoing viability but there are also areas where the historical land use decisions, current competing land uses, as well as risks from road strike, dog attack and, in some areas, drought and bush fire events mean that it will be much more difficult to secure those populations. Government will need to make clear choices and invest resources where it is most likely to make a difference.

Critical to this are data. We need more and better quality data and more information to prioritise investment, to get the most out of the various regulatory and management tools we have available and to know if we are making progress towards the overall goal. New sensor and data analytics technology can make data gathering more efficient and cost effective.

Key elements of a whole-of-government koala strategy should be to:

- prioritise data gathering and research about populations, habitat and threats, including the cumulative impacts of multiple threats, to inform better planning and management decisions
- review and align the various legislative and management arrangements to ensure improved outcomes for koalas across different land uses and tenures
- work across tenures to identify and implement on-ground actions that improve connectivity and resilience against threats
- identify incentives for best practice new development and ongoing land use in all cases where koala populations may be adversely affected across tenures, industries and land users
- establish a framework for on-going coordination and cooperation of land managers, policy makers, researchers and the community to deliver the defined actions.

While many of the recommendations in this report aim to understand and address threats to koala populations, it is also important to support those who respond when the threats cannot be mitigated. Fauna rehabilitation groups play a critical front-line role in assisting the recovery of individual koalas, most commonly injured by car strikes, dog attacks or fire.

Successful implementation of a NSW koala strategy should lead to the following outcomes:

- we will know which koala populations have the potential for long term viability
- we will have evidence that threats to these populations have been identified and mitigated
- the community will feel confident that new development and ongoing land use will not threaten key koala populations
- our scientific knowledge of koala populations, dynamics and health will be substantially increased
- the number of koalas will become stable and then start to increase.

A NSW koala strategy should provide clear benefit to key koala populations in NSW. However, in identifying and protecting koala habitat and managing key threats, this strategy will also benefit other native species and NSW landscapes more broadly.

RECOMMENDATIONS

This review makes 11 recommendations to inform the development of a NSW koala strategy.

Recommendation 1

That Government adopt a whole-of-government koala strategy for NSW with the objective of stabilising and then starting to increase koala numbers.

Recommendation 2

That Government initiate a program to improve data on the number, location and occurrence of koalas in NSW, including trends over time, taking advantage of new sensor and communication technologies and data analytics within 12 months of receipt of this report.

Recommendation 3

That Government publish a state-wide predictive koala habitat map within three years of receipt of this report, with immediate priority given to improving coverage of the north coast.

Recommendation 4

That Government improve outcomes for koalas through changes to the planning system.

Recommendation 5

That Government improve outcomes for koalas through the Biodiversity Conservation Bill and associated Regulations.

Recommendation 6

That Government investigate models for guiding and incentivising collaborative best practice for new development and ongoing land use occurring in areas of known koala populations across tenures, industries and land users.

Recommendation 7

That Government agencies identify priority areas of land across tenures to target for koala conservation management and threat mitigation.

Recommendation 8

That Government, through the Office of Environment and Heritage, convene two symposia within 12 months of receiving this report: one for scientists active in koala research and land managers to develop a koala research plan; and one focussed on koala rehabilitation to identify actions to optimise the delivery of and support for the network of koala rehabilitation groups and carers.

Recommendation 9

That Government establish the Australian Museum as a preferred repository for koala genetic samples in NSW, and all data and metadata associated with these samples should be deposited into the SEED Environmental Data Portal (extended if necessary to include flora and fauna).

Recommendation 10

That Government facilitate the exchange of information among land managers, local government, the research community and the broader community.

Recommendation 11

That Government draws on knowledge and shares information with local community members through a program that supports localised engagement between liaison people and residents and industry.

Contents

Executive summary	iv
Recommendations	vi
1 Introduction	1
1.1 PURPOSE OF THE REVIEW	1
1.2 PROCESS OF THE REVIEW	1
1.3 CURRENT NSW POLICY SETTINGS AND PROGRAMS	1
1.4 COMMUNITY CONCERNS	3
1.5 HOW THE REPORT IS STRUCTURED	5
2 Current information	6
2.1 STATUS OF THE KOALA IN NSW	6
2.2 KOALA POPULATION CASE STUDIES	7
2.3 HABITAT MAPPING AND POPULATION DATA	10
2.4 ESTABLISHING A HIERARCHY OF THREATS	12
2.5 RISK TOLERANCE AND MITIGATION	13
2.6 MITIGATION MEASURES IN CURRENT PLANNING PRACTICES	14
2.7 UNDERSTANDING THE ECONOMIC, SOCIAL AND ENVIRONMENTAL VALUE OF KOALAS ...	22
3 Major issues needing attention	24
3.1 GOVERNMENT AGENCIES CAN IMPROVE THE WAY THEY WORK TOGETHER TO MANAGE THREATS TO KOALAS	24
3.2 IMPROVING DATA ON KOALA NUMBERS AND HABITAT	25
3.3 A LANDSCAPE APPROACH TO MANAGING AND MITIGATING THREATS	30
3.4 CREATING A CONSERVATION NETWORK	31
3.5 EMBEDDING HABITAT INFORMATION INTO THE PLANNING SYSTEM WILL IMPROVE DECISION MAKING	32
4 Recommendations	34
4.1 A WHOLE OF GOVERNMENT STRATEGIC APPROACH	34
4.2 PRIORITISE INFORMATION FOR BETTER PLANNING AND DECISION MAKING	35
4.3 APPLYING OUR KNOWLEDGE TO IMPROVE OUTCOMES	36
4.4 OPPORTUNITIES FOR THE SCIENTIFIC AND BROADER COMMUNITY TO DIRECTLY CONTRIBUTE	38
References	41
Appendices	52
APPENDIX 1 TERMS OF REFERENCE	52
APPENDIX 2 OVERVIEW OF LEGISLATION	55

1 INTRODUCTION

1.1 PURPOSE OF THE REVIEW

In March 2016 the Minister for the Environment asked the Chief Scientist & Engineer to conduct an independent review into the decline of koala populations in key areas of NSW. The Minister asked that the Review provide an evidence base from which a koala strategy for NSW can be prepared.

This report presents information about the current state of koala populations across their range in NSW and provides an initial evidence base for actions to address key threats to those populations. This report makes 11 recommendations, with the overarching recommendation for government to adopt a whole-of-government koala strategy for NSW with the primary objective of stabilising and starting to increase koala numbers.

1.2 PROCESS OF THE REVIEW

A Koala Advisory Committee was established with NSW government agency representatives and independent experts to provide advice and input to the review process. The Koala Advisory Committee met seven times between May and November. The Terms of Reference for the Review and the committee membership are in Appendix 1.

The Review has examined the hierarchy of threats to koala populations across NSW bioregions and the current legislative and regulatory framework for managing koalas and their habitat at the state and national level. The Review has investigated the historical context that has led to the current koala population distribution and numbers and also considered what other jurisdictions are doing to manage koalas and examples from other relevant programs.

A supporting paper examining four koala population case studies, which was commissioned by the Office of Environment and Heritage (Predavec, 2016), is published on the Chief Scientist & Engineer website.

1.3 CURRENT NSW POLICY SETTINGS AND PROGRAMS

Relevant government legislation

The combined koala populations of Queensland, New South Wales and the Australian Capital Territory are listed as vulnerable under the *Environment Protection and Biodiversity Conservation Act (1999)* (EPBC Act). It means that project proponents need to consider whether their project will have a significant impact on important koala populations in these jurisdictions. If a project has or will have a significant impact, the EPBC Act requires the project to be referred for a decision by the Federal Environment Minister on whether the project is a 'controlled action'. If unsure, project proponents may refer the project to the Minister. The Australian Government is currently developing a recovery plan for the koala populations of the ACT, NSW and Queensland.

Koalas are listed as vulnerable under the NSW *Threatened Species Conservation Act (1995)* (TSC Act). There are also three listings of the koala as an endangered population in NSW; the Hawks Nest and Tea Gardens area of Great Lakes Local Government Area (LGA), the Pittwater area of Warringah LGA and the area between the Tweed and Brunswick Rivers, east of the Pacific Highway.

The listing of koalas as vulnerable means they must be considered under the *Environmental Planning and Assessment Act (1979)* (EP&A Act) when preparing environmental planning instruments and when undertaking development assessments. The koala is also protected under the *Native Vegetation Act (2003)* (NV Act), which requires impacts of clearing on threatened species to be avoided or offset in order to improve or maintain environmental outcomes. The review noted that the draft *Biodiversity Conservation Bill* proposes to repeal the NV Act and TSC Act and replace them with one integrated act.

Under the EP&A Act, consent authorities must consider the impacts of actions on species listed under the TSC Act. This is specified in the objects of the Act and must be considered for all development assessments. The Act also allows for issue-specific policies to be prepared such as State Environmental Planning Policies (SEPPs). SEPP 44 – Koala Habitat Protection (1995) was introduced to encourage the conservation and management of koala habitat. SEPP 44 applies to 107 LGAs, to land greater than one hectare in area and to projects where council is the determining authority. It requires the consideration of potential and core koala habitat before development consent can be granted. SEPP 44 encourages councils to prepare Comprehensive Koala Plans of Management (CKPOM). If a CKPOM has not been prepared for an area then a project proponent may need to prepare an individual Koala Plan of Management. The Department of Planning and Environment is currently reviewing SEPP 44 to identify ways to improve the existing protections and to modernise them. This includes how koala habitats are defined, as well as the tree species list in SEPP 44. This report recommends a second review stage could also assess how effective SEPP 44 and CKPOMs have been and their roles in the planning system (refer to Recommendation 4).

There are also other regulatory requirements for specific activities. For Private Native Forestry (PNF), there is a code of practice that includes koala specific measures for Property Vegetation Plans (PVPs). For non-PNF PVPs the Threatened Species Assessment Tool allows for clearing where offsets would improve the habitat of specific threatened species to at least the same extent as the habitat values lost through the proposed clearing. The assessment does not allow clearing where impacts are unsustainable for a local population of a threatened species. The NSW Government is reviewing the current legislation framework, these arrangements may change in the future.

The Environment Protection Authority (EPA) regulates the Forestry Corporation of NSW (FCNSW) native forestry operations under Integrated Forestry Operations Approvals (IFOAs). IFOAs are made under the *Forestry Act (2012)* and bring together the requirements for environmental planning and assessment, protection of the environment and the protection of threatened species and their habitat.

Environmental standards and controls are applied and enforced at all phases of mining, from exploration to production, to mine closure and post mine closure.

All new mining and petroleum projects (this includes gas extraction), and modifications to existing projects, require approval under the EP&A Act before they can commence. As part of this approval process, the proponent must prepare an Environmental Impact Statement with opportunities for public comment, which covers a range of issues, including flora and fauna, threatened species assessments and landscape management. If a project is approved conditions may be imposed to minimise or mitigate environmental impacts through biodiversity offsets or require future rehabilitation.

Recent amendments to the *Mining Act (1992)* and the *Petroleum (Onshore) Act (1991)* have also given the NSW Government greater control and power to ensure environmental protections for threatened biodiversity such as koalas. The grant of all new exploration titles for coal and petroleum will be administered under the Government's new Strategic Release framework which assesses a range of environmental, social and economic factors before

any new areas are released. The grant, transfer and renewal of titles also require more explicit environmental protection considerations before a decision is made. Conditions imposed on titles under *Mining Act (1992)* and the *Petroleum (Onshore) Act (1991)* must be consistent with the development consent granted under the EP&A Act.

As part of these conditions, proponents of major mining projects must pay a security deposit for the costs of rehabilitation and develop a rehabilitation management plan, and the Department of Industry (Resources and Energy) currently manages approximately \$2.2 billion in rehabilitation security deposits. This deposit is not released until the titleholder can demonstrate all rehabilitation obligations have been met. The Department of Industry (Resources and Energy) has created a Resources Regulator with widespread powers to carry out compliance and enforcement of resources activities including regulation of rehabilitation obligations. Under the *Mining Act (1992)* and the *Petroleum (Onshore) Act (1991)* there are penalties up to \$1.1 million for non-compliance.

Roads and Maritime Services NSW (RMS) also has a responsibility under the EP&A Act when considering development projects. The majority of RMS's projects are assessed under part 5 of the Act. This assessment is often documented in a review of environmental factors.

Appendix 2 provides a detailed summary of legislation and policies that relate to koalas in NSW. The NSW flagship conservation program Saving our Species seeks to align resources and efforts for threatened species conservation and management under a single program. The koala has been assigned to the "iconic species" management stream due to its status as a national icon and its important social, cultural and economic values. A conservation project is being developed for each iconic species, outlining the critical conservation actions necessary to achieve the stated conservation objective for the species.

Many of the legislative settings for koalas rely on habitat mapping (prepared under SEPP 44), site specific surveys or historical records as triggers. As discussed later in this report, there are many limitations in this: SEPP mapping has limited coverage and is expensive; site surveys are expensive and can have poor reliability in some terrain and vegetation types; and the historical records are patchy with very limited data available for many areas of the state. During the writing of this report the Department of Planning & Environment proposed amendments to SEPP44. An Explanation of Intended Effect was released for public submissions (NSW Department of Planning & Environment, 2016).

Community initiatives

There are many dedicated response and wildlife rehabilitation groups working at the front-line of rehabilitation of orphaned, injured or ill koalas found in the wild. Collision with cars, attacks from wild and domestic dogs, disease and wildfire are the most common causes of illness and injury to koalas in NSW (NSW OEH, 2016c). Overall, rates of koalas returning to the wild are very low and provide evidence that prevention of the harmful effect of certain risks will provide much better outcomes for koalas. During the 2013-2014 NPWS reporting period 816 sick, injured or orphaned koalas were taken into care in response to requests for assistance, 197 required no follow up response (NSW OEH, 2016c). Of those taken into care, 331 koalas (53%) died of their injuries or were euthanised and 182 (or 30%) were successfully rehabilitated and released alive to the environment. All remaining animals are either still undergoing rehabilitation or have been transferred to zoos to remain in captivity.

1.4 COMMUNITY CONCERNS

There is a wide range of interest groups and stakeholders that publicly express their concerns regarding threats to koalas and their conservation. The main issues have been summarised below, following a desktop survey of relevant websites and publications from key groups and organisations.

The foremost concern for many groups involved in koala conservation is ongoing habitat loss. Conservation groups regard the removal of vegetation as the greatest threat to koala populations. Some groups aim to restore as much habitat as possible through revegetation projects (NVI, 2016). Others such as the Australian Koala Foundation and Friends of the Koala also seek to strengthen legislation and regulatory processes around forestry and land clearing (AKF, 2016). Some groups view land conservation as the most effective way to protect koalas, and often work closely with other environmental groups involved in land care. For example, the National Parks Association of NSW, with support from community and environmental groups, have developed a proposal for the Great Koala National Park (NPA NSW, 2016a).

Closely linked to this are concerns about resource developments and the perceived impacts they have on koalas and their habitat. Several prominent mining proposals are currently subject to opposition campaigns by environmental groups such as The Wilderness Society and The Nature Conservation Council of NSW (The Wilderness Society, 2015). In many cases these campaigns are strongly backed by local communities in the affected areas (NPA NSW, 2016b).

Some groups are also concerned about the impacts of extreme weather events and climate change on koalas, given their vulnerability to droughts, heatwaves and fires, especially following loss and degradation of habitat.

Other leading causes of injury and death to koalas including vehicle strike (Shoebridge, 2016), dog attack (Kontos, 2015) and disease (AKF, 2016) are of critical concern to the community, especially where mortality is greater than the replacement rate of koalas. Many groups involved in the care and rehabilitation of koalas raise concerns about the rate of injured and diseased koalas entering care, and the capacity of rehabilitation centres to function effectively given very limited resources (Griffith, Dhand, Krockenberger, & Higgins, 2013). In many cases koalas entering care do not survive, or will remain in care facilities for the long term (Wildcare Australia Inc., 2016). Many of these care facilities believe that community education programs are the best approach to preventing koala injury and death. The most common threats in residential areas are vehicle strike, dog attacks and drowning in swimming pools, and many local residents are unaware of the best way to prevent or deal with an injured koala. There are several campaigns designed to build awareness in communities about how to protect koalas, including making properties koala friendly, ensuring pets are kept responsibly and driving safely within key koala areas (Koalas In Care, 2016).

Many local councils view koalas as an important asset for their communities and for local tourism, but also seek to balance conservation outcomes with development activities, such as through application of SEPP 44 and the preparation of CKPoMs. Conservation groups often advocate strongly for the development and implementation of these plans, particularly in LGAs where they have not been finalised (Ecosure, 2015). They argue that the current framework needs strengthening to support its aims to ensure there is consistency in koala management and protection (NPA NSW, 2016c).

Those who campaign for more awareness also call for more research into koala populations to address local threats more effectively. The Australia Koala Foundation has suggested that it is difficult to make regulatory decisions without a solid foundation of evidence (AKF, 2015). For example, some community groups have argued for the establishment of designated 'koala-friendly' communities with appropriate regulations for pet ownership, pool construction and fencing. Without appropriate mapping of these areas, these regulations are difficult to implement.

Industry concerns

Key stakeholders in industries such as mining, forestry and agriculture support improving planning mechanisms in order to ensure clarity and reach an appropriate balance between conservation and development. Many suggest that regulations are overly complex and confusing, and that simplifying legislative mechanisms can provide benefits for both biodiversity and production (NSW Farmer's Association, 2016; NSW Minerals Council, 2016; Timber NSW, 2016). Recent submissions to government processes have also shown that a majority of natural resource management industries support changes to regulatory processes such as PNF codes of practice and the NV Act (NSW Farmer's Association, 2016; NSW Minerals Council, 2016; Timber NSW, 2016). They advocate for the streamlining of planning and land management regulations in order to ensure socioeconomic and environmental outcomes can be met efficiently by all landholders.

1.5 HOW THE REPORT IS STRUCTURED

The evidence base underpinning the report is summarised in Chapter 2 and major issues needing attention are discussed in Chapter 3. Chapter 4 presents the recommendations with detailed commentary.

2 CURRENT INFORMATION

2.1 STATUS OF THE KOALA IN NSW

Koalas were historically distributed throughout the woodlands and forests of NSW but have experienced significant declines in both numbers and distribution. The Recovery Plan (DECC, 2008) states that “most populations in NSW now survive in fragmented and isolated habitat and many of the areas in which koalas are most abundant are subject to intense development pressures.” (DECC, 2008).

Despite a range of regulations, recovery programs, strategies and numerous community initiatives overall koala numbers in NSW are in decline.

Although historically spread across a wide geographic range in all states (except Tasmania and the Northern Territory), extreme climatic conditions in the Pleistocene (which ended approximately 11,700 years ago) resulted in substantial range constriction. Genetic evidence also suggests that koala population levels were relatively low at this time. The first recorded sightings of koalas by Europeans occurred in 1798, 10 years after European settlement (Black, Price, Archer, & Hand, 2014). It is reported that koala populations experienced rapid growth in the decades following European settlement, which has been attributed to a reduction in indigenous hunting practices and predation pressure from the dingo, which was displaced or exterminated. However, urban development in the late 19th century, combined with fire events and agricultural expansion, led to a decline in the geographic range of the koala due to the loss of habitat (Black et al., 2014).

Surveys in NSW indicate that since 1949, populations of koalas have disappeared from many areas, particularly from the southern and western edges of their distribution (Reed, Lunney, & Walker, 1990). A dynamic occupancy modelling study of the occurrence of koalas in NSW using historical state-wide koala survey data has also shown that the probability of occurrence has declined steadily (Santika, McAlpine, Lunney, Wilson, & Rhodes, 2014; McAlpine et al., 2015).

Current estimates suggest there are now approximately 36,000 koalas in NSW, representing a 26% decline over the past three koala generations (15-21 years) (Adams-Hosking et al., 2016). Across 13 regional koala populations in NSW, nine koala populations were estimated to be in decline, three stable and one increasing (McAlpine et al., 2015).

While declining numbers is of great concern, we also note analysis of historical records and genetics provide a range of evidence that the number and range of koalas have expanded and contracted over time due to environmental and anthropogenic causes. Indeed, in the 1920s koalas were thought to have been extinct in South Australia, and reached levels as low as 500 – 1000 individuals in Victoria due to factors such as bushfires and the fur trade (Black et al., 2014). Interventions such as re-establishment programs (Black et al., 2014) have led to increases in koala numbers in some cases. Careful planning does need to be undertaken, however, to avoid negative consequences of such activities. For instance introduced koalas have thrived in some specific locations and are now overcrowded in some restricted locations such as Kangaroo Island (where numbers were estimated at 27,000 in 2001) (Masters, Duka, Berris, & Moss, 2004). Another problem has been the low genetic diversity in South Australian koalas, brought about by the relatively small number of koalas used in the relocation initiatives.

Summary of threats to koalas

The koala is considered a specialist folivore, as each individual feeds on a handful of primary food trees from over 70 *Eucalyptus* species and 30 non-eucalypt species. As a result of this

restricted diet it is indicated that they are highly susceptible to changes in the environment (Black et al., 2014).

The koala is threatened across its range by a wide variety of processes that includes: habitat loss and fragmentation, vehicle strikes, dog attacks (both domestic and wild dogs), disease, and climate change. Individually and collectively these threats provide major challenges to koala recovery (McAlpine et al., 2015). These threats also vary spatially across NSW, so different threats are prominent in different places. Against this backdrop of spatially varying threats, climate change is an emerging threat that is likely to shift suitable climatic conditions for the koala toward the coast, thus constraining the potential range of the species (Adams-Hosking, Grantham, Rhodes, McAlpine, & Moss, 2011; Santika et al., 2014; Briscoe, Kearney, Taylor, & Wintle, 2016).

Chlamydia will continue to be a factor in future population resilience in response to significant and multiple threats, given there is currently positive but slow progress towards vaccination (Redland City Council, 2016; Waugh, Khan, Carver, Hanger, Loader, Polkinghorne, Beagley, & Timms, 2016). It is widespread in koala populations and symptoms of blindness, pain, incontinence and infertility are exacerbated when an individual is exposed to additional stressors such as loss of habitat, harassment by predators, heatwaves, nutritional stress or overcrowding (Waugh et al., 2016). They become weakened and consequently more vulnerable to death from other threats in particular dog attacks and severe weather conditions (DECC, 2008). Chlamydia is likely to continue to drive pronounced population declines in urban coastal regions in association with other mortality from habitat destruction, domestic dog attack and vehicle strike (McAlpine et al., 2015).

Koala habitat and home ranges

Koala habitat can be defined broadly as forests or woodlands containing koala food and shelter trees and other parts of the landscape that koalas use for movement.

A range of eucalyptus forests and woodland communities such as woodlands of the tablelands and Western slopes, coastal forests and riparian communities of the Western plains, as well as isolated paddock trees make up koala habitat (DECC, 2008). Quality of habitat is influenced by climate and rainfall, species and size of the trees present, structural diversity of the vegetation, soil nutrients and size and disturbance history of the habitat (DECC, 2008).

A koala's home range depends on the variety of food trees available and the quality of the habitat. In NSW for example, a koala's home range can vary greatly. Some home ranges have been recorded at 10-15 hectares (AMBS, 2012), while others have been recorded at up to 500 hectares (DECC, 2008). In a study of koalas in an urban area, males were estimated to have a least twice the home range size of females (Goldingay & Dobner, 2014).

Koalas are known to both be restricted by and also to use development boundaries, in some areas moving along linear pathways or boundaries (AMBS, 2012). Disruptions to continuous habitat have been shown to alter home ranges and territories in other mammals (Donaldson & Bennett, 2004).

2.2 KOALA POPULATION CASE STUDIES

Four NSW koala population case studies were prepared to inform the review, and the report prepared by Predavec (2016) is available at the Chief Scientist & Engineer's website. Key findings from the case study report are summarised below. The case studies have examined historical and recent population trends for koala populations in different parts of the state and cover populations that are declining, stable and increasing and subject to a range of local, regional and state-wide threats.

2.2.1 Coffs Harbour – a stable coastal koala population

Coffs Harbour LGA is located on the mid north coast of NSW. Coffs Harbour was the first LGA in the state to adopt a CKPoM under SEPP 44 in 2000. The koala population has persisted between 1990 to 2011, following a perceived decline in the 1980's (Lunney, Predavec, Miller, Shannon, Fisher, Moon, Matthews, Turbill, & Rhodes, 2016). While the Coffs Harbour population can be best characterised as stable to slowly declining, there are a number of coastal urban and peri-urban areas where koalas are no longer present.

This case study highlights the key issue faced by koala populations in urbanising coastal areas: namely that koala and human habitat overlap, increasing the potential for conflict and threats. Given the spatial distribution of koalas within Coffs Harbour it is likely that future urbanisation, and the associated threats of vehicle strike and dogs, will have an increased impact on the koala population.

The apparent stability of the population in this area merits further study to determine the contributing factors. Regular monitoring should determine if the population remains stable.

2.2.2 Pilliga Forests, Liverpool Plains and Gunnedah – declining inland population

This case study focuses on a large area of north-west and central NSW including the Pilliga Forests in the west, Gunnedah LGA in the east and the Liverpool plains in the south and centre. It is debated whether this region contains a single koala population, a metapopulation or isolated populations. Predavec (2016) suggests there is sufficient consistency in patterns of population trends for the koalas of the area to be considered together. Recent studies within this area suggest a dramatic decline in koala populations. Surveys of the Pilliga forests in the 1990s suggest that the forests were carrying the largest population of koalas west of the Great Dividing Range in NSW, with the population estimated at 15,000 (Kavanagh & Barrott, 2001). Repeat surveys within the Pilliga forests show a decline of over 80% since the 1990s.

Although many of the threats to this area's koala population are common across much of NSW, west of the Great Dividing Range, koalas are also affected by drought and extreme heatwaves as was seen in the 2009 heatwaves (Lunney, Crowther, et al., 2012). The impact of these extreme weather events on koalas is likely to increase with predicted climate change impacts and may also exacerbate other recognised threats such as disease (Lunney, Crowther, et al., 2012). Koalas have been shown to tolerate a degree of habitat alteration caused by selective harvesting of cypress trees in the Pilliga, an important day-time shelter tree (Kavanagh, Stanton, & Brassil, 2007).

The interaction of threats has led to decline of koalas within the Pilliga Forests. The magnitude and pattern of decline is similar to that in other semi-arid regions such as south-west Queensland (Seabrook, McAlpine, Baxter, Rhodes, Bradley, & Lunney, 2011). The Pilliga forest koalas are likely to have faced extreme (but less frequent and long) heat events in the past and responded by retreating to creek lines with either available free water or a higher moisture content in the leaves of their food trees. However, land clearing within and on the periphery of the forests and from road construction since the early 1900s has resulted in creeks within the Pilliga forests silting up (Hesse & Humphreys, 2001). Habitats that would have once likely functioned as refugia during times of drought are now highly disturbed and are unlikely to provide the required level of protection for the koala (Lunney et al., 2016).

2.2.3 Campbelltown – a low density peri-urban population

Campbelltown LGA is situated in the south-west metropolitan area of Sydney and illustrates a case of a low density population that is persisting. The current population is estimated at between 100 and 150 individuals over an area of 31,166 hectares, representing a low

density population (Biolink, 2016). The current population within Campbelltown LGA is best described as stable or increasing, acknowledging that the population is low and always has been (Close, Ward, & Phalen, 2015). The Campbelltown case makes the point that a low density population does not lead to the conclusion that it is in decline or unviable.

The Campbelltown koala population is the longest known koala population to Europeans in Australia, with the first sighting recorded in January 1798 (Lunney, Close, Bryant, Crowther, Shannon, Madden, & Ward, 2010). This population has persisted through early settler land clearance and a series of fires last century. Close et al. (2015) provide findings from a 20-year radio-tracking study showing that female koalas lived long lives and produced multiple offspring.

The type and level of threat affecting a population can change over time and the present significant threats for this area are vehicle collision, domestic dog attack and habitat loss. Campbelltown currently has a draft CKPOM, which if approved, will provide support for data gathering on the koala population and define management strategies for their future.

2.2.4 South Coast – a reduced population affected by habitat loss

The south coast koala population referred to in this case study falls within the Bega Shire LGA and is situated in the south-east corner of NSW.

Historical evidence suggests that koala numbers were high enough to support a commercial pelt industry in the late 19th century (Lunney & Leary, 1988). Declines in the koala population was noted following successive land-use changes from the 1830's onwards, which included clearing for agricultural land, intensive logging and urban development (Lunney, Stalenberg, Santika, & Rhodes, 2014).

By 1970, the koala population in this region had been significantly reduced to several isolated pockets. Recent estimates from surveys conducted in 2012-14, and information on the extent of available habitat and estimated home ranges, the remaining population in the north-east corner of the LGA is estimated at 30 – 60 individuals (NSW OEH, 2016a).

Further studies also suggest that other factors involved in koala decline in this region are disease (Lunney & Leary, 1988) and climate change (Lunney et al., 2014).

In 2016, approximately 12,000 hectares of state forest in this region was reclassified into flora reserves, adjacent to reserve estates, and will be managed by NSW National Parks and Wildlife Services for the conservation of koalas and other wildlife (NSW OEH, 2016d).

2.2.5 Overall conclusions for the case studies

Case studies are a useful way to understand both the local differences and the common themes in the conservation of a species. Predavec (2016) indicated that the emerging themes across the case studies were:

- *“it is only through long term and repeat studies of koala populations that we start to understand the patterns of population change*
- *koala populations are subject to a range of threats across the state, some of which are common, others that are localised*
- *low density populations are possibly more common than we once thought and that low density does not necessarily equate with a population in peril*
- *despite the multiple levels of legislative and policy protection afforded the koala, we still have populations in decline*
- *the level of information available on koala populations is variable across the state and there is no mechanism in place to collect consistent data*

- *koala populations and their population trends can change rapidly and a lack of consistent and regular monitoring means we are not in a position to promptly identify these changes."*

2.2.6 Additional case study on Port Macquarie-Hastings

The Port Macquarie-Hastings LGA encompasses some 368,113 hectares of land between Taree and Kempsey on the mid-north coast of NSW. The area has a long history of koala occupation with over 6,000 koala records on the NSW Wildlife Atlas for the LGA. A koala habitat study of the LGA (Biolink, 2013) estimated a conservative population size of 2,000 animals with more than half of these occurring in the coastal area east of the Pacific Highway between the Hastings and Camden Haven Rivers. This includes a nationally significant source population with an estimated population size of greater than 500 animals located on private and public lands surrounding Lake Innes (Biolink, 2013).

As there is a large and significant koala population in Port Macquarie that is a major tourist attraction, the Port Macquarie Koala Hospital was established in 1973 to treat and care for sick and injured koalas. The hospital has a number of paid expert staff and numerous volunteers who care for the 200 – 250 koalas admitted through the hospital annually (Koala Hospital, 2016). The hospital alone has approximately 100,000 visitors a year.

While the area has a long historical association with koalas it has also seen rapid urban expansion and development of infrastructure, including major expansions to the roads and highways, conflicting with koala habitat. As a result of these developments, koala habitat has declined and the remaining habitat has become more fragmented (Biolink, 2013). Threats to koalas associated with urban development, such as dog attacks and road strike by vehicles, has also increased. In response to the findings in the study by Biolink, council has commenced the preparation of a draft CKPOM.

In July 2016, the Port Macquarie-Hastings Council held a 'koala roundtable' to bring koala experts and key stakeholders together to discuss the emerging data that suggests that the Port Macquarie-Hastings koala population may be in the early stages of decline. This trend has also been confirmed by data from the Port Macquarie Koala Hospital, which shows a decline in admissions, with no juvenile admissions. Mortality rates of koalas from a combination of road strike, dog attack and disease are considered high and the population is likely to be unsustainable in the long term, with at least 82 koalas recorded to be lost each year east of the highway and many more lost but not recorded (Koala Hospital, 2016). This mortality rate is likely to be higher than the breeding potential in the population, with the potential for continued declines and localised extinction in many areas in the long term (30 – 50 years) unless threats and associated mortality rates can be significantly reduced. This is a scenario common to many northern NSW coastal koala populations.

2.3 HABITAT MAPPING AND POPULATION DATA

Maps of koala distribution, habitat, threats, and other factors can be developed through spatially enabled monitoring and records, or through modelling or expert elicitation when there is not sufficient data available. A range of different mapping approaches will inform and guide the management of koala populations, from local to state-wide scales. This section discusses approaches to mapping the actual or predicted location of koalas and their habitats, while Section 2.4 describes mapping of the threats to koalas.

Three types of map that are typically developed for species conservation or management being maps showing the occurrence of animals (from records or models), the trends in the population of the animals, and maps of suitable habitat (actual or predictive habitat maps). In developing an informed management and conservation approach for koalas, it would be preferred to have access to all three map types.

2.3.1 Koala likelihood of occurrence

The last state-wide survey of koalas was undertaken in 2006 as part of a broad community-based (citizen science) wildlife survey (Lunney, Crowther, Shannon, & Bryant, 2009). The survey asked the community whether they had seen koalas in their area, the locations of those sightings and whether they thought the local population was increasing, decreasing or staying the same. This survey method, combined with occupancy modelling, allowed the likelihood of koala occurrence to be compared to the 1986-87 state-wide survey and therefore population trends to be determined.

The Atlas of NSW Wildlife is the main repository for koala records and is drawn on for many decision making purposes (NSW OEH, 2016e). While the Atlas is an important and essential source of data it is important to understand that there is a bias in the spatial distribution of the koala records. There is a bias towards data from state forests due to a statutory requirement to carry out site surveys before harvesting. There is also a bias towards data collected from roadways as many of the citizen science records and other sightings are recorded along roads (where there are more people to observe), and include road killed koalas. There is also a bias against records of sightings on private lands due to access restrictions, and only patchy survey across the public land estate.

To overcome these issues of bias, the number of koala records within a certain area was compared with the overall number of mammal records in that area: providing an indication of the likelihood of koalas in that area that is independent of the number of people surveying. More details of this methodology are available in Predavec, Lunney, Shannon, Scotts, Turbill, and Faulkner (2015).

For locations that have data (i.e. records of koalas having been present), the koala likelihood of occurrence maps show the probability of a koala being recorded in a particular area, with the output being a value between 0 (no likelihood) and 1 (certain likelihood of occurrence). The methodology as described by (Predavec et al., 2015) also allows an assessment of the confidence levels in the data (i.e. how robust are the data and what are their deficiencies).

The resulting information can be put to a range of uses including informing decisions about further monitoring and ground-truthing campaigns where there is no data, or where the data has low confidence levels.

For locations where there are data, the likelihood values provide a metric that relates to the presence and distribution of the animals, which is important for prioritisation of management and conservation activities. Currently, NSW has a map of probability of koala occurrence for the period of 1990-2015 at 10 km resolution (Predavec et al., 2015). The map shows likelihood of occurrence, the level of confidence in likelihood value and also areas where there are no data (Predavec et al., 2015). Combined with a predictive koala habitat map, likelihood of occurrence data helps decision makers develop informed decisions.

2.3.2 Predictive koala habitat mapping

Habitat mapping provides a representation of the geographic distribution of habitat. We do not currently have a map of koala habitat that is state-wide and across all land tenures. Therefore, agencies across government may not always be able to account for important koala habitat at a landscape scale when making decisions and private land holders may not be aware that koala habitat is on their property.

Currently, SEPP 44 is the main driver for habitat-based mapping to influence development decisions. However, the amount of habitat mapping that occurs under SEPP 44 is limited, as mapping only covers areas where local councils are the decision making authority. Only four local councils currently have approved CKPOMs in place, although nine other councils have drafts in preparation and others have decided to proceed with a strategy instead of a

CKPOM. Regional based decision making is not possible using the CKPOM mapping at the moment as it is at a local scale. Habitat mapping also occurs as part of specific studies in localised areas. Again this is not useful for regional scale decision making.

There are improvements that can be made to ensure habitat mapping is expanded across NSW and in the most effective manner. Predictive habitat suitability models are developed by bringing together information on environmental variables such as soil type, weather patterns, vegetation type and quality, elevation, frequency of wild fires, topography etc. These characteristics are modelled and then compared with existing records of koalas to produce a map of predicted habitat suitability that is correlated with likelihood of occurrence of koalas (GHD, 2009). The end product is further validated in the field to increase the confidence in and reliability of the model. This development in predictive koala habitat modelling would provide an important basis for the development of a state-wide, cross-tenure predictive habitat map.

2.3.3 Population data

Population trend data are also important. They allow us to see a change in population, either in numbers or distribution or both. These data may reveal if a koala population is responding to interventions, or whether interventions are required. Population trends are determined by analysing data from comparable repeat surveys and also through expert elicitation (Predavec et al., 2015; Adams-Hosking et al., 2016).

Not all populations of koalas will show the same trend, as described in the koala population case studies. However, koala populations are declining in many, if not most areas of NSW and the trajectory of population change can alter rapidly. Regular, systematic monitoring of koala populations will help us understand the patterns of population change, inform appropriate interventions, and allow success to be identified.

2.4 ESTABLISHING A HIERARCHY OF THREATS

Threats to koalas are well documented (DECC, 2008; NRMMC, 2009a). The impact varies both temporally and spatially. Mapping of the threats to koalas at a bioregional scale, as determined by the International Biogeographic Regionalisation of Australia version 7, (IBRA7) (Commonwealth Department of the Environment and Energy, 2016), was evaluated at a workshop convened by the Australian Centre for Ecological Analysis and Synthesis in 2012 (McAlpine et al., 2014).

This workshop gathered 15 koala researchers with in-depth knowledge and experience in koala ecology and conservation, to identify and estimate the impact of 14 threats to koalas for the previous three koala generations (15-21 years) and future three generations (Adams-Hosking et al., 2016).

The threat mapping was conducted using a structured process of expert elicitation. This method is often used to synthesise diverse sources of information, particularly where data from surveys and models are limited or have significant gaps, and has led to it being used increasingly to inform and support decision making (Adams-Hosking et al., 2016). It is particularly valuable when a species' status is uncertain or unknown yet its persistence in the wild is subject to multiple and potentially synergistic threats (Adams-Hosking et al., 2016).

The threat mapping method proposed by this workshop could provide a useful baseline for policymakers and conservation managers, as it would give a preliminary indication of the nature, intensity and scale of the threats and to tailor appropriate remedial actions to secure koala populations and improve conservation outcomes. The threat mapping also represents a useful starting point in identifying priority research. An example of a map-supported threat abatement plan is the NSW Fox Threat Abatement Plan (NSW OEH, 2010).

While a valuable indicator of past and future threats at a bioregion scale, it needs to be recognised that there is a wide variation of threat distribution, scale and intensity within the regional scale (Santika, McAlpine, Lunney, Wilson, & Rhodes, 2015) and care should be taken in interpreting the data. Finer scale mapping such as at the scale of LGA, is likely to be a prerequisite for any planned localised conservation actions, assessment of development proposals or research scoping.

Acknowledging that some threats could be categorised as being widely distributed over a bioregion (e.g climate change), while others are more localised, such as those from mining or roads, a mapping approach that illustrates both threat categories could be looked at through the strategy development phase.

2.4.1 Cumulative impacts

Where more than one threat impacts a species in a particular area, understanding the cumulative and synergistic impacts of the threats is crucial. This is particularly important where the impact of each individual threat is small, but the cumulative impacts are large.

Importantly, threats can impact on species synergistically, such that the combined effects of multiple threats may be much greater than the sum of the individual threats (Brook, Sodhi, & Bradshaw, 2008). There is strong evidence that many threats can interact synergistically, including interactions between climate change and other threatening processes such as habitat loss and fragmentation (Brook, 2008; Brook et al., 2008; Mantyka-Pringle, Martin, & Rhodes, 2012; Doherty, Dickman, Nimmo, & Ritchie, 2015).

In these cases, managing threats individually is unlikely to be a successful strategy (Rhodes, Ng, de Villiers, Preece, McAlpine, & Possingham, 2011; Santika et al., 2015) and a more holistic approach that considers cumulative impacts and interactions among threats is necessary (Auerbach, Wilson, Tulloch, Rhodes, Hanson, & Possingham, 2015; Mantyka-Pringle, Martin, Moffatt, Udy, Olley, Saxton, Sheldon, Bunn, & Rhodes, 2016). In the koala context, Santika et al. (2015) have demonstrated the importance of strategically tackling multiple threatening processes to koalas in NSW.

In particular, evidence suggests that climate change and the interaction with other threats to koalas are likely to be severe. This may arise because climate change simply increases the cumulative impacts beyond that which can be sustained by koalas. However, it may also arise through a synergistic interaction between climate change and the other threats present, exacerbating the cumulative impact of existing threats further (Seabrook et al., 2011).

A realistic future scenario for koalas in NSW, which illustrates how multiple threats may interact at broad scales, is that koala distributions could contract from the west due to climate change and contract from the east due to urban development and habitat loss. This potential scenario suggests the need to identify climate refugia that are relatively insulated from climate change and are also locations where other threats are low or can be realistically reduced (Briscoe et al., 2016). As such, although koala conservation strategies can do little to directly influence climate change, these must be considered in developing koala conservation responses as they can have dramatic implications for the best choice of strategy (Santika et al., 2015).

2.5 RISK TOLERANCE AND MITIGATION

Actions are regularly taken that require individuals, organisations and governments to make decisions about the trade-offs between environmental, social and economic values. Our ability to take actions that strike an acceptable balance between these values is in part based around how we view “risk”. In an environmental context, risk is considered to be a combination of the likelihood of an event occurring and the environmental consequence associated with that event if it does occur.

While the tools that are used to measure and account for risk have improved significantly over time, the trade-offs made generally reflect our risk tolerance. Risk tolerance can be either precautionary or evidentiary. A precautionary attitude towards risk will classify a taxon as threatened unless it is certain that it is not threatened. In contrast, an evidentiary attitude will classify a taxon as threatened only when there is strong evidence to support a threatened classification (IUCN, 2016).

Based on the evidence presented in this report, it is clear that some NSW koala populations are under stress and continue to decline. Understanding the threats to koala populations and our risk tolerance towards those threats is important in deciding if, where and how to act. Based on the precautionary principle, which is defined under the *Protection of the Environment Administration Act (1991)*, if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.

The International Organisation for Standardisation (ISO) and Standards Australia maintain risk management standards, with these being used across Australia to help individuals and organisations manage risks.

A key element of risk management is the identification of mitigation measures; including “measures envisaged in order to avoid, reduce and, if possible, remedy significant adverse effects” (European Union Directive 2011/92/EU). The International Association for Impact Assessment present the following mitigation approach (de Jesus, 2013):

- *“Enhance positive impacts*
- *Avoid negative impacts to the greatest extent possible*
- *Minimise (or reduce) what cannot be avoided*
- *Remedy (or restore) what cannot be reduced*
- *Compensate for what cannot be remedied.”*

Many organisations already apply risk management strategies where their actions interact with koalas. For example, the Department of Planning and Environment requires an Environmental Impact Assessment to be completed for all major development applications to identify potential impacts and mitigation strategies. The Environment Protection Authority maintains a risk based Compliance Policy that sets its approach to compliance and enforcement across the industries it regulates.

Maintaining key koala populations will depend on understanding the local, regional and broad scale threats to that area’s koala population. This requires clearly identifying the risks associated with each threat and, based on our tolerance for those risks, developing measures that mitigate or manage those factors.

2.6 MITIGATION MEASURES IN CURRENT PLANNING PRACTICES

2.6.1 Koala protection under land management and biodiversity conservation reforms

The draft *Biodiversity Conservation Bill 2016* and draft *Local Land Services Amendment Bill 2016* were passed through NSW Parliament during the preparation of this report. This section discusses those reforms and is based on the materials publicly available at the time:

“A new land management framework under the Local Land Services Act (2013) (LLS Act) proposes ways NSW landholders can manage land with native vegetation. The aim is to allow farmers to undertake legitimate land clearing efficiently and improve agricultural productivity. The new Native Vegetation Regulatory Map will underpin the new land management

framework under the LLS Act. For native vegetation clearing, land is mapped as either regulated, unregulated or excluded.

The proposed new framework will provide landholders with a range of options for native vegetation management on Category 2 Regulated Land:

1. **Allowable Activities**
Defined low-risk native vegetation clearing activities that are part of routine land management will not require a formal approval or notification to Local Land Services.
2. **Land Management Codes of Practice**
Codes of practice will be developed, allowing landholders to undertake clearing that supports more productive farming methods and systems, while responding to environmental risks. Each code of practice has varying requirements for notification to Local Land Services, certification or, in some cases, requiring the establishment of permanent set-aside areas on the land to improve biodiversity.

If an activity cannot be undertaken in accordance with allowable activities or a code, approval under the LLS Act will be required. In these circumstances, the biodiversity impacts of the clearing will be assessed and offset using the Biodiversity Assessment Method (BAM).

Native Vegetation Regulatory Map

Under the proposed land management and biodiversity conservation reforms, a Native Vegetation Regulatory Map will be developed to show rural lands where:

- native vegetation clearing can occur without approval
- landholders need to comply with the LLS Act.

The map won't apply to:

- urban areas and land use zones excluded from the provisions of the regulatory map
- land regulated under other legislation, such as national parks and state forests.

Land in the Native Vegetation Regulatory Map will be classified into two categories.

- **Category 1: Exempt Land (Blue):** on exempt land, clearing of native vegetation will be exempt from the new land management framework.
- **Category 2: Regulated Land (Yellow):** on regulated land, clearing of native vegetation can occur in accordance with an allowable activity or code under the LLS Act.
- **Excluded:** The land management framework does not apply, and clearing is regulated under the Environmental Planning and Assessment Act 1979 and the new Biodiversity Conservation Act framework, as well as some other legislation such as national parks and forestry legislation" (NSW Government, 2016a)."

The LLS Amendment Bill, prescribes land to be designated as Category 2 Regulated Land. This includes land identified as core koala habitat in a plan of management made under SEPP No 44—Koala Habitat (LLS Amendment Bill Div. 2 s60H (k)).

Once the state-wide predictive koala habitat and likelihood of koala occurrence maps have been developed this information could replace the core koala habitat requirement. This will be consistent with the stated intention but will draw on more up-to-date mapping and data.

Biodiversity offsets

Under the NSW Government's biodiversity reforms, a single biodiversity offsets scheme will be introduced to apply to development. The NSW biodiversity offsets scheme will be established under the Biodiversity Conservation Act. A central element of the scheme is a new Biodiversity Assessment Method to assess the impacts of development on terrestrial biodiversity and determine biodiversity offsets:

"The BAM will replace a range of existing biodiversity requirements and methodologies under the current planning and threatened species legislation... The introduction of a single BAM should greatly increase transparency for developers and the broader community (NSW Government, 2016a)."

Biodiversity Assessment Method (BAM)

The BAM is a metric-based tool that aims to assess biodiversity impacts consistently and scientifically at a development site, and biodiversity benefits at an offset site in order to calculate 'biodiversity credits'. The BAM should create a consistent biodiversity assessment process for certain development applications under the EP&A Act and applications that require the clearing of native vegetation under the *Local Land Services Act (2013)* (LLS Act).

The BAM will give proponents guidance on ways to avoid and minimise impacts from their development, and will then calculate offsets for any remaining impacts.

For development that requires consent under the EP&A Act, the BAM will need to be used to assess the impact of the development on biodiversity values where the development is above the BAM threshold, or where the development triggers the existing threshold of significant effect. A risk-based approach has been adopted for setting the proposed BAM threshold, to capture projects with greater risk of biodiversity impacts while ensuring that lower risk developments are not required to apply the BAM. The aim of the BAM threshold test is that it is simple, practical and able to be applied by a non-expert.

It is proposed that the BAM will need to be used to assess a development if any criteria listed below are met. In addition, the BAM will also apply to any developments that will have a significant effect on biodiversity based on the existing assessment of significance (formerly known as the seven part test) under the EP&A Act. The BAM will also apply where approval to clear native vegetation under the LLS Act is required.

Proposed BAM threshold criteria:

1. Area of vegetation clearing is above the clearing threshold (for subdivision, this is area of proposed future clearing), or
2. If site is on land identified on the 'threshold values map', or
3. If proposed clearing exceeds what is allowed under the LLS Act (i.e. 'allowable activities' or codes of practice).

The 'threshold values map' is under development, however it aims to capture sensitive values. The Submission Guide (NSW Government, 2016b) suggests the map would include: core koala habitat, coastal wetlands, littoral rainforests, Ramsar wetlands identified under environmental planning instruments and areas of outstanding biodiversity importance under the Biodiversity Conservation Bill.

Once the state-wide predictive koala habitat and likelihood of koala occurrence maps have been developed this information should be used to inform the BAM threshold values map. This will be consistent with the stated intention to use core koala habitat but will draw on more up-to-date mapping and science.

Serious and irreversible impacts

The Biodiversity Conservation Bill recognises that there are some types of 'serious and irreversible impacts' that are generally not acceptable to the community. It recognises that some impacts on biodiversity value will significantly increase the risk of species extinction or long-term viability or are otherwise particularly severe.

The consent authority will determine whether a project has serious and irreversible impacts. 'Serious and irreversible' impacts must be avoided for non-major projects. For State Significant Development (SSD) and State Significant Infrastructure (SSI), "serious and irreversible impacts" will be matters for the consent authority to consider when determining the project. The offsets scheme seeks to prevent these impacts from occurring to reduce the risk of further threatened species or communities becoming extinct.

The criteria to identify serious and irreversible impacts are to be set out in the regulations made under the Biodiversity Conservation Bill. Based on the evidence considered throughout this review into the decline of koala populations in NSW, consideration should be given to including impacts on the koala as a serious and irreversible impact and a threshold established, which is based around a category of the species' best quality remaining habitat.

2.6.2 Public native forestry harvesting

The current approach in NSW for managing impacts of harvesting of public forests on the environment is through Integrated Forestry Operations Approvals (IFOAs). IFOAs integrate the regulatory regimes for environmental planning and assessment, protection of the environment and threatened species conservation.

IFOAs specify sensitive areas of land which must be excluded from harvesting, for example riparian corridors (areas along streams), high conservation value old growth, rainforest, rare forest types and wetlands (Australian Government, 2015).

Informal and formal reserves within state forests account for approximately 43% (675,717 hectares, as of 2014) of native state forest estates in the regions covered by coastal IFOAs (Slade & Law, 2016). Formal reserves are flora reserves which are excluded from harvesting.

It is recognised that koalas, and other threatened species, require specific prescriptions to maintain key elements of their habitat in order for them to persist in harvested landscapes. This has included protections such as exclusion zones for areas where there is active and high use by koalas, and retention of a defined number per hectare of preferred koala feed trees in intermediate use areas. Little data is available to assess the effectiveness of these prescriptions in mitigating impacts on koala populations.

The IFOAs define the harvesting volumes and type of silviculture practice allowed in koala habitat. Silvicultural practices applied on the north coast of NSW have changed during the life of the current IFOAs, with the NSW EPA advising that a more intensive form of harvesting emerged around 2007 in public forests, referred to as regeneration harvesting.

Negotiations are underway between the EPA and Forestry Corporation of NSW to decide on specific requirements for koala protections under the remade single Coastal IFOA, which is being developed to bring together four separate current IFOAs (NSW EPA, 2016b).

The Koala Advisory Committee has recommended more studies in areas where regeneration harvesting has been applied, or where it may occur into the future. This is to determine if regeneration harvesting and associated forestry practices in these forests impact on koala populations. Further assessment of the effectiveness of current and proposed IFOA prescriptions designed to mitigate the impacts of harvesting is also required, with monitoring undertaken over the long term. This research will be necessary to understand the trajectory of koala populations in these areas and to inform evidence-based regulatory settings.

There are few studies that have considered the direct impact of native forest harvesting on koalas (Jurkis, Rowell, & Ridley, 1994; Kavanagh, Debus, Tweedie, & Webster, 1995; Roberts, 1998; Smith, 2004). Studies suggest koalas can tolerate low intensity harvesting of habitat that includes food trees but higher intensity harvesting may have a more negative effect on koala occupancy (Smith, 2004). In the Pilliga Forest, koala persistence was measured before and after low intensity harvesting of an important day time shelter tree, koalas continued to occupy this habitat for a further measured seven months post harvesting (Kavanagh et al., 2007).

Scats have been considered as the easiest method of determining koala presence to date (NSW Government, 2014) and their presence informs the koala survey requirements set out in the IFOAs (Jurkis et al., 1994; Smith, 2004). A pilot study conducted by the EPA tested a range of different koala habitat mapping methods in state forest, identified challenges and limitations with using scat based surveys for identifying koalas to determine koala occupancy, in particular issues in the accuracy and ease of scat detection (NSW EPA, 2016c). Other projects have used radio-tracking (Jurkis et al., 1994; Kavanagh et al., 2007) or scat detection dogs (Cristescu, Foley, Markula, Jackson, Jones, & Frère, 2015). New approaches to locating, modelling and mapping koalas would overcome the limitations of scat surveys and assist in promoting greater certainty for koala protection.

The NSW Department of Industry – Lands has advised the Committee that it is progressing research to determine the presence of koalas in high quality habitat areas, including areas that have been harvested. It covers forest areas that are being or have been commercially harvested and looks at parameters including ‘time since harvesting’ as well as ‘harvesting intensity’. New technologies, including ‘SongMeters’, have recorded koala presence at more sites than previously. SongMeters target the spring peak in male calling behaviour and can be a useful tool to investigate koala occupancy across landscapes. Preliminary data shows that koalas have been recorded across the full range of forest sites, including in areas that have undergone more intensive harvesting practices (DOI – Lands pers comms.). The work is still underway and yet to undergo peer review to understand the efficacy of these technologies.

Current and recommended research is indicative of a shift towards a more holistic approach to koala conservation, with an increased focus on understanding the potential threats to koalas, improving the effectiveness of koala management, and gaining a better understanding of koala population trends over time. Landscape approaches to monitoring would be beneficial to improve the capacity to track koala population levels over time. Department of Industry – Lands indicates that more analysis of the impacts on koalas of more intensive forest harvesting is required and is being undertaken.

2.6.3 Mining and exploration

At this stage, there is sufficient information available to develop best practice principles for mitigating impacts of mining activities, including coal seam gas extraction. This includes actions as part of a development consent to establish and enhance wildlife corridors and design new areas of habitat, support pest management, install exclusion fencing and implement onsite and offsite offsets.

Shenhua Watermark Coal Pty received exploration approval in 2008. A Koala Plan of Management was developed for Shenhua Watermark by Cumberland Ecology, outlining the proposed actions to mitigate or offset the impacts on koala populations in the area (Cumberland Ecology, 2013). They were developed through surveying and mapping of the proposed site and offset areas as well as ongoing consultation with koala scientists and ecologists to determine both the risk and appropriate level of action.

The proposed measures are an example of best practice principles of avoidance, mitigation and compensation. However, the effect of these measures is not assessable as operations have not commenced at this stage.

Some key actions include:

- site-based protections, including dust and noise minimisation and koala exclusion fencing
- the establishment of a Koala Advisory Committee comprised of independent experts to advise on management strategies
- road and rail design to take into account high risk areas and known habitat corridors

- maintenance and enhancement of eight identified habitat corridors with specifications regarding tree species, location and performance criteria
- vertebrate pest management according to the Biodiversity Management Plan of the project
- a bushfire management plan developed in conjunction with the Rural Fire Service
- onsite and offsite offset measures to potentially restore around 4,500 hectares of koala habitat
- a staged clearing process based on pre-clearance surveying
- translocation measures based on OEH's *Policy for the Translocation of Threatened Fauna in NSW* (NSW NPWS 2001).

There is still an overall lack of evidence to show the short and long-term effectiveness of offset and rehabilitation activities. This may reflect the limited number of consents and associated mining leases that have specified the need to restore koala habitat to pre-mining conditions. Operational mines can impact koala populations via habitat clearing, increasing disturbance and therefore pest animal and plant activity. Mining activities can also have indirect impacts such as noise, light and dust. Construction of roads and railway lines also represents a significant threat as it can cause habitat fragmentation. The impacts of new roads and rail lines can be exacerbated by the fact that mines can operate continuously, which limits opportunities for koalas to move safely between habitats. Many mining operators propose implementing the reduction of speed limits around project sites as a mitigation measure, but this has not yet been proven to be effective (Dique, Thompson, Preece, Penfold, de Villiers, & Leslie, 2003; AMBS, 2012).

More work is required to evaluate the effectiveness of offset and rehabilitation activities, including testing the assumption that habitat restoration directly leads to species restoration. There is currently only one known study that has attempted to test this (Cristescu, Rhodes, Frère, & Banks, 2013). The research highlighted that ongoing monitoring and management of rehabilitated sites is necessary for determining whether koalas will return following mine closure.

Significantly more work is also required to assess the potential cumulative risks of major mining projects in conjunction with other threats in the landscape and to identify effective cross-tenure actions to improve and enhance koala habitat. Monitoring of mining activities should also extend to landscape-scale monitoring across the life of the mine. Most conditions of consent separate the threats that mining presents to koala populations, and in order to understand the full extent of this, detailed monitoring should occur across the site and surrounding area from the beginning of exploration through to rehabilitation.

2.6.4 Minimising and monitoring koala road mortalities

Roads can have a negative impact on koala populations due to increased competition for habitat, territorial disputes and increased stress levels (AMBS, 2012), and road-related injuries can be a major cause of mortality and entry into care for koalas (Lunney, Lemon, Crowther, Stalenberg, Ross, & Wheeler, 2012). Roads and Maritime Services (RMS) practice for new roads in koala habitat is to avoid (where possible), mitigate and offset impacts on koalas and koala habitat. Where required, RMS implements a range of mitigation actions including fauna movement structures to facilitate movement as well as koala grids and fencing to prevent road access at certain points and to redirect koalas to connectivity structures. RMS also undertakes pre-clearing processes to minimise risk to koalas during construction. These different methods have a range of costs, maintenance requirements and understanding of their effectiveness.

Barrier and exclusion fencing is intended to reduce strike mortality, however, creating barriers may exacerbate habitat fragmentation caused by road development (AMBS, 2012). Fauna movement structures include underpasses and overpasses. While commonly used

worldwide, with a variety of taxa recorded to use them (AMBS, 2012), there is limited understanding of how they benefit koala populations.

Dexter, Appleby, Edgar, Scott, and Jones (2016) provides a summary of studies on wildlife use of fauna movement structures. There are two studies which examine koala use of specifically designed structures in NSW (RTA, 2009; AMBS, 2012). Neither study recorded koalas using overpasses (RTA, 2009; AMBS, 2012), however, koalas were recorded using underpass structures in the north coast region (RTA, 2009).

Underpass structures are used by introduced predators, including cats, dogs and foxes (RTA, 2009; AMBS, 2012). The Koala Management Plan for the Woolgoolga to Ballina upgrade of the Pacific Highway includes monitoring fauna movement structures to detect predatory animals. Where identified as a threat, RMS will work with North Coast Local Land Services, NSW National Parks and Wildlife Service (Grafton), and Rural Lands Protection Board (North East) and adjacent landowners to implement controls predatory animals (NSW RMS, 2016).

A six year study on the Bonville Pacific Highway realignment found that koalas maintained home ranges up to the edge of the highway (AMBS, 2012). A high proportion of koala road mortalities occurred in the dispersal season (sub-adults) and breeding season (adults) (AMBS, 2012). There was evidence to suggest that many koalas killed by highway vehicle collisions are from more distant areas, indicating that roads may affect a wide section of the population (AMBS, 2012). The report recommended extending monitoring to include the collection of genetic information post-construction and use of the overpass following vegetation regrowth (AMBS, 2012). Clearing for construction should be undertaken outside breeding and dispersal periods, these periods should be understood before new road construction (AMBS, 2012).

More recently the Koala Management Plan for the Woolgoolga to Ballina Pacific upgrade of the Pacific Highway took a comprehensive approach to protecting, mitigating and rehabilitating koala habitat and populations (NSW RMS, 2016). A population viability analysis (PVA) from the Ballina Koala Plan indicates that irrespective of the upgrade to the Pacific Highway, the Ballina koala population will decline over the next 50 years due to a high mortality rate and low fecundity.

The Koala Management Plan (NSW RMS, 2016) contains a number of pre-construction, during- and post-construction specifications for mitigating the impact along different sections of the highway upgrade, including the procedures listed in Table 1.

Table 1: A range of mitigation procedures used in the Koala Management Plan for the Woolgoolga to Ballina Pacific upgrade of the Pacific Highway, note that these are used in various locations of the upgrade.

Pre-clearing and clearing procedures	During Construction	Post-construction
<p>Pre-clearance monitoring aimed at determining:</p> <ul style="list-style-type: none"> • population status • habitat use and movement patterns • habitat areas likely to be impacted upon/fragmented • identification of 'hot spots' of koala activity • identifying suitable locations for fauna movement structures. <p>Clearing procedure</p> <ul style="list-style-type: none"> • staged clearing and use of methods to encourage koala movement out of the area by removing food resources • daylight canopy searches by an ecologist prior to clearing • suspension of work for 48 hours within a clearing area if a koala is found (to facilitate voluntary koala movement out of the area) • koala relocation protocol: in the case of a koala remaining there beyond the 48 hours, it will be captured and relocated by a suitably qualified person to the nearest habitat • identification of exclusion zones <p>Development of a koala fencing strategy and construction of temporary exclusion fencing</p>	<p>Road signs: for risk awareness to minimise koala road mortality</p> <p>Temporary koala exclusion fencing implementation and maintenance protocols. Temporary fencing to transition to permanent in certain sections and to extend along certain byroads (e.g. Wardell Road)</p> <p>Fauna movement structures</p> <ul style="list-style-type: none"> • approximately 174 underpasses <p>Construction work method statements, including:</p> <ul style="list-style-type: none"> • stop-work protocols: koala relocation protocol • worksite induction and 'toolbox' meetings • domestic dog policy • dust and noise management • exclusion zones for construction vehicles • enforced speed limits and vehicle tracking <p>The presence of a licenced wildlife carer/ecologist during all stages of vegetation clearing</p> <p>Site revegetation protocols</p> <p>Predator controls</p>	<p>Monitoring of the effectiveness of mitigation strategies:</p> <ul style="list-style-type: none"> • crossing zones / fauna movement structures/ fencing • offsets • predator control <p>Monitoring of the koala population demographics to track against the PVA and determine whether there is a statistical decline</p> <p>Predator control programs</p>

Pre-construction decision making to determine the type, location and number of connectivity structures, considered the following:

- known/potential koala habitat and connectivity routes
- local population density
- previous experience from monitoring programs which investigated the effectiveness of connectivity structures.

Monitoring the effectiveness of connectivity structures and other mitigation activities is imperative for understanding the most effective methods for reducing koala mortality on roads. The challenge for road authorities is to extend these learnings to the existing road network and this will require a targeted, collaborative approach at local scales. The identification of important populations as part of the koala strategy offers an important opportunity to identify key koala road kill hotspots where targeted mitigation actions can support a suite of co-ordinated efforts to conserve the local population.

2.6.5 The impact of fire

Fires are an increasing risk to koalas in several areas of NSW. Fire threatens koalas through a multitude of impacts. Intense fires can destroy habitat and cause severe injury and death to individual animals. Koalas are also affected by smoke and ash inhalation. Dog attack post-fire reduces survival rates and this is exacerbated in highly fragmented coastal urban landscapes (Lunney, Gresser, O'Neill, Matthews, & Rhodes, 2007).

NSW Rural Fire Service Bush Fire Risk Management Plans include lists of areas with threatened flora and fauna, treatment plans and maps identifying vulnerable populations and endangered species (NSW RFS, 2016b). The National Parks and Wildlife Service (NPWS) in designing hazard reduction burn plans in known koala habitat will factor in the species' requirements with respect to burn timing, intensity and retention of habitat trees (e.g. by raking around hollow trees to prevent burning) (NSW OEH, 2016c).

An OEH and NPWS fire regime study in 2010 concluded that crown fires arguably have the greatest impact, in the short to medium term (e.g. loss of canopy cover and tree death, especially of tall forest Eucalypt dominants), reduced survival of animals especially arboreal mammals and others with limited dispersal/flight capacity, and increased soil impacts such as sediment movement and loss of organic matter (Hammill, Tasker, & Barker, 2013). Smaller regular burns can however still directly affect individual koalas as they often remain in the trees when hazard reduction burns take place or through contact with burnt lower portions of trees. Regular controlled low intensity fires can promote fire-retardant shrubby species and reduced eucalypt growth (Clarence Valley Council, 2015), unfortunately reducing the habitat suitability for koalas.

In 2013-2014 the NPWS undertook 232 prescribed burns, during this period there were 342 wildfire incidents in national parks. There has been a downward trend over 20 years in the overall size of wildfires, due to planning and response time (NSW OEH, 2016c).

Mosaic pattern of prescribed burning treatment is undertaken across NSW (NSW RFS, 2016a). This patchwork pattern of prescribed burning aims to reduce the risk of a significant bushfire in parks and reserves and provide wildlife with safe refuge while the vegetation regrows (DEWNR, 2011).

Further research is needed into the effect on fauna. A barrier to understanding the impact of fire on koalas is that flora studies are much more prevalent than fauna studies in regard to monitoring effects of fire. In assessing the impact of mosaic prescribed fires Clarke (2008) raises concerns about monitoring studies being short-term, a lack of clear knowledge around patch size, proximity and connectivity and cautions that studies rely on flora responses to burns rather than fauna. Driscoll et al. (2010) highlights spatial arrangements and that species ability to persist under managed fire mosaic regimes is poorly understood and it cautions against reliance on traditional methods, given the modern changes that have created developed, fragmented or modified landscapes. Effective feedback and monitoring is key to understanding the effectiveness of patch mosaic burning as it increases in uptake in Australia as a practice (Parr & Andersen, 2006). Clarke identifies a need for broad-scale and/or long term studies of fauna in response to fire regimes (Clarke, 2008).

2.7 UNDERSTANDING THE ECONOMIC, SOCIAL AND ENVIRONMENTAL VALUE OF KOALAS

The most widely quoted figure on the economic value of koala tourism comes from a study by Hundloe and Hamilton (1997), valuing koala tourism at \$1.8 billion. The study found that the income directly contributed \$1.1 billion to the Australian economy and provides approximately 9000 jobs. The research into the economic value of the koala warrants being updated to reflect the current tourism value.

Nature-based activities, combined with Australia's unique flora and fauna, are a major source of tourism. The study by Hundloe and Hamilton (1997) conducted a survey of departing international foreign tourists, and provided the following insight: when asked which animals they particularly wanted to see in Australia, 72% of respondents nominated koalas, making them the most popular choice (followed by kangaroos at 66%).

South Australia acknowledges the valuable local opportunities koala eco-tourism provides (DEWNR, 2011) and Victoria recognises the need to manage populations to 'ensure that the species continues to flourish in the wild' as a 'major tourism drawcard' within its management strategy principles (DSE, 2004). NSW government could learn from the approaches of Victoria and South Australia and work with Destination NSW.

Within NSW, in 2006-07 the World Heritage Gondwana Rainforests drew \$327 million of visitor expenditure, of which \$145 million was value-added, and accounted for over 1600 jobs. A summary of several economic studies has shown protected areas in north-east NSW to have added \$124 million to the local region, and to have supported almost 2000 jobs (Love & Sweeney, 2015).

3 MAJOR ISSUES NEEDING ATTENTION

3.1 GOVERNMENT AGENCIES CAN IMPROVE THE WAY THEY WORK TOGETHER TO MANAGE THREATS TO KOALAS

As outlined in Section 2.1 of this report, koalas are found across a wide range of habitats and locations. While koalas are recognised as threatened across two thirds of the species' range, the species is not uniformly threatened at all locations, with some populations in Victoria and South Australia even requiring a reduction in numbers (NRMMC, 2009a).

As presented in Section 2.4 of this report and in the work by McAlpine et al. (2015) and Santika et al. (2015), the threats to koala populations vary between and within different regions of NSW.

While additional information will help inform future threat management and mitigation, it is clear that there is sufficient evidence from which government can act now. This report recommends adopting a whole-of-government koala strategy for NSW, with the objective of stabilising and then starting to increase koala numbers.

Individual government agencies, and those outside government, are already pursuing measures to manage or mitigate impacts on koalas. The aim of the strategy should be to build on this base and provide a more strategic and coordinated way for government agencies to work together to identify and implement actions that have the greatest likelihood of reducing key threats to koala populations. It is also crucial that the strategy delivers information and tools that help the private sector and the community take actions as appropriate and make it easier to work with government.

To achieve this, the strategy needs to start from a strong evidence base including direct detection, mapping existing koala habitat, likelihood of occurrence data and threat mapping. The strategy should present this information as its base case or starting point. This information will also be critical to monitoring the effectiveness of actions taken and, more broadly, whether the objective of stabilising and then starting to increase koala numbers is being achieved. Over time it is hoped that information about genetic diversity can also be brought to bear to inform future management actions.

The strategy should identify key koala populations and analyse the state of and threats to those populations, with the expectation that this analysis will set:

- specific on-ground actions that government agencies, in combination with the private sector and the community, can take now at a local, regional and state-wide scale
- the direction for policy reform, such as considering specific changes to the planning framework and working with the Federal government to align assessment and monitoring methods.

Publishing the results of this analysis will also ensure that there is a clear and transparent rationale for directing where, what and at what scale actions and policy reforms need to be taken.

State-wide threats, such as habitat loss and the predicted likely increased incidence and severity of future droughts, require responses across the koala's range. Other threats, such as urbanisation in the Sydney Basin and on the north coast require actions specific to each area.

The strategy should make it clear which agency or agencies are responsible for which actions, set timeframes for those actions and specify how their success will be measured. A

strong model for local and regional level inter-agency collaboration is already used in relation to how agencies work together to implement Bush Fire Risk Management Plans. A similar approach could be established to support implementation of identified local and regional management and mitigation actions.

In establishing the need to act, the strategy should also make it clear where there is a need for policy reform. The strategy should outline reform areas and set accountabilities and timeframes. This will be important to ensuring that the systems designed to support healthy koala populations are effective.

To be successful, the strategy needs to recognise and provide opportunities for involvement of Aboriginal traditional owners and community members as traditional custodians of the land, the private sector and broader community. There is already a wealth of information about what works and what doesn't, as well as clear avenues for further research. The strategy should bring this information together and present it in a way that others can take informed decisions.

In developing a state-wide strategy, the deficiencies of past strategies and plans need to be recognised. Predavec (2008) and McAlpine et al. (2015) provide reviews of the National Koala Conservation and Management Strategy (NRMMC, 2009).

3.2 IMPROVING DATA ON KOALA NUMBERS AND HABITAT

The NSW koala strategy should prioritise gathering better data about the number, location and abundance of koalas, and their habitat, as the basis for better management and decision-making.

In particular, new sensor technologies and data analytics can be employed, in combination with data gathered through EISs, citizen science and traditional survey methods such as scat surveys, to build a much richer picture of koala occurrence. Data fusion techniques can bring this information together which can then be used to inform better models of population and habitat. The raw data should also be available in the SEED Environmental Data Portal (extended if necessary to include flora and fauna) for open access by government, community and researchers.

This should link with the Government's new investment in the NSW Smart Sensing Network. This initiative will develop and apply 'smart sensor' technologies to a range of complex issues, including monitoring technologies for native animals like koalas, and use ICT to identify and track species.

There are a number of other strands to the task of improving data which are outlined in the following sections.

3.2.1 Likelihood of occurrence and population trends: surveying and citizen science surveying

The report recommends that a program be developed to build on the koala likelihood of occurrence map (Predavec et al., 2015) by targeting gaps in data particularly in priority areas (e.g. where there are higher threats).

Surveying is essential to gathering important data on koalas. Undertaking surveys in priority areas will build on the current state-wide map of likelihood of koala occurrence. These data, in combination with the predictive habitat map, will help decision makers to protect koala habitat, better plan development in areas with koalas and undertake threat mitigation at a population and landscape scale.

More survey data also allows comparisons with previous surveys and for broad population trends to be discovered. Knowledge of whether a population is declining, stable or increasing is important for decision makers to determine whether interventions are working, or whether different interventions are required. Building a strong picture of koala occurrence in combination with trends (see below for more details) will allow confident, cross-tenure decisions across government to be made about koala management to secure koala populations across their broad geographical range (Adams-Hosking et al., 2016).

The 2006 state-wide koala survey was used to gather data to develop broad-scale maps of populations for the purposes of targeted management action (Lunney et al., 2009). This study showcases the importance of ongoing survey data and the way it is used to determine occupancy and trends. The information was used to inform the 2008 Koala Recovery Plan (DECC, 2008).

There are many methods to obtain survey data, including citizen science. Citizen science involves members of the community in data collection. Advances in technology, such as apps on smart phones, or interactive maps on websites, allow citizen scientists to record data, such as locations where koalas were seen or were absent, quickly and accurately. Data can also be uploaded instantly to wildlife databases and analysed far more cost effectively to determine changes in koala distribution.

The community gains an increased awareness of conservation issues and engagement in management outcomes by being involved in surveys. Previous citizen science surveys of koala distribution show that community-developed knowledge matches traditional science results on koala distribution (Lunney et al., 2009).

Citizen science surveys allow data to be gathered cost effectively over a long period of time and across a large geographical area, including private land. It also helps to boost data that has gaps and inconsistencies, such as koala presence and absence data. The state-wide koala surveys used citizen scientists to gather data during 1986-1987 and again in 2006 with success (Lunney et al., 2009). For those areas where citizens are not usually likely to survey, such as in bushland away from roads and urban areas, partnerships with local groups who will go to those areas are important.

It is important to ensure citizen science survey models are replicable, comparable and account for limitations in the data. Volunteer citizen scientists must be educated on the target species and trained in the standardised sampling protocol to safeguard against unusable data. To ensure the use of the reported data, precautions must be taken to minimise the risk associated with public-gathered data such as encouraging a photograph whenever possible. In addition volunteers may also be provided a range of example data collection sites representing all suitable habitat types. Importantly, participants must not report a false sighting if the target species was not sighted during their search, but instead report an “absence sighting”.

Combining the results of the surveys and predictive habitat modelling will provide a comprehensive landscape based picture of where koalas are, how they are faring across NSW, and allow government to manage koalas better and undertake threat mitigation at a population and landscape scale.

3.2.2 Population monitoring

In many cases, the reliance on traditional point-in-time surveys (such as scat surveys conducted according to licence conditions under IFOAs) has proven ineffective at providing data on population trends, as they are not designed for comparative or repeat surveying (Woosnam-Merchez, Cristescu, Dique, Ellis, Beeton, Simmonds, & Carrick, 2012; Slade & Law, 2016). A robust monitoring program is essential to understand the impact of interventions and activities at a landscape scale and at specific sites and how populations

respond over time. A targeted monitoring program is especially important in remote areas that may not be regularly visited by the public or researchers.

All major infrastructure projects and natural resource management activities have a local impact on the environment. However, further information is required on how this impacts the broader koala population over time. Monitoring is essential to manage a range of threats. It is also important that effective monitoring of actions is undertaken to ensure that management decisions are founded on 'best available science'.

The report recommends the development and implementation of a plan for systematic long-term population monitoring across tenures. This monitoring and the subsequent analysis of data should be well funded and undertaken annually. All data and metadata should be deposited in the SEED Environmental Data Portal. This monitoring plan will define clear objectives to assess and report on existing mitigation actions for koala conservation across all tenures and activities and include trigger points that specify the implementation of particular actions when thresholds are exceeded in line with an adaptive management approach.

An example demonstrating the value of a robust long-term regional monitoring program for koalas can be found in the Queensland Government's South East Queensland Koala Monitoring Program (Rhodes, Beyer, Preece, & McAlpine, 2015). This program has monitored the abundance and occupancy of koalas in South East Queensland over the past 20 years and has been critical for providing a strong evidence basis for policy development.

Given the lack of clarity on koala population status, especially in remote areas, a robust monitoring program should aim to provide the following benefits, including:

- assessing the effectiveness of koala policies across all land tenures
- information for informing future policy change
- provision of data to give managers, policy makers and the community better confidence in population and distribution trends over time
- provision of information that will assist and improve the development of policies that encourage increased koala protection and enhance their population
- better information to provide targeted areas in which to focus further research
- better information of the status and trends of koalas in timber production forests
- better information on the status and trends of koalas whose habitat is impact by major infrastructure and the impact this has on the wider koala population.

There are a number of monitoring methods, each with its own limitations, which can be used to research and monitor koalas across a variety of landscapes. Which survey techniques and sensor technology that can be employed are dependent on the purpose of the monitoring: for example, whether it is large-scale population monitoring, monitoring of site-specific mitigations or data on a specific individuals within a population. The technologies and sensors used for koalas could also be used simultaneously to monitor other species that share the same environment. Improved and novel technologies and techniques that are being investigated in a variety of studies and environments include those described below. The new NSW Smart Sensing Network will also generate new monitoring approaches.

Acoustic monitoring

Acoustic monitoring is capable of detecting koala presence. Male bellows are recorded during the breeding season with SongMeters (Ellis, Bercovitch, FitzGibbon, Roe, Wimmer, Melzer, & Wilson, 2011), presenting an innovative opportunity for monitoring individuals and populations over time. Combining results from acoustic monitoring with traditional monitoring methods and analytical tools such as the occupancy modelling framework would provide strong data across the landscape scale (MacKenzie, Nichols, Lachman, Droege, Royle, & Langtimm, 2002).

Remote monitoring and tracking

Current monitoring studies usually use GPS/VHF collars. This technology is not without limitations: Matthews et al. (2013) examined 24 studies that included 280 GPS collar deployments, and concluded that problems associated with collar design resulted in only a small proportion functioning reliably over the periods of study. Problems included 15% of collar deployments yielding no data, and 75% of the studies incurring additional costs as a result of unexpected locational accuracy.

Wireless identification (WID) tags are a novel technology that could increase our understanding of koala movements, in conjunction with traditional methods such as the GPS/VHF methods. WID tags are relatively small (under 10 g), can remain active for months/years (battery dependent), and replace standard plastic ear tags. For example, WID tags have been used by the Queensland Department of Transport and Main Roads in Moreton Bay area (TMR, 2016). The tags allow data to be obtained on koala movements, including the ability to ascertain their typical ranges and if they moved outside of these ranges. When a fatality occurs to a tagged koala, it also allows the individual to be located and, potentially, the cause of death to be determined and adaptive threat management to be implemented (Endeavour Veterinary Ecology, 2016; TMR, 2016).

Wireless identification tags, in combination with a data harvesting system and motion activated cameras, were used by researchers at Griffith University to monitor koalas using crossings over roads in south-east Queensland (Dexter et al., 2016). In their subsequent report, they indicated that the use of remote technology is still hampered by the trade-off between the different requirements of a project, the data required and the costs related with implementing and recovering the monitors.

Koala scat sniffer dogs

Population data can be hard to gain for species, such as the koala, that are characterised by low density and large home ranges, and whose behaviour makes visual identification difficult. For these species, indirect measurements such as scat (faecal pellets) surveys can be a useful indicator of the presence or absence of the species and how they use the environment (Phillips & Callaghan, 2011; Cristescu et al., 2015). Scat surveys have been used to inform some of the CKPOMs prepared under SEPP 44.

Using dogs specifically trained to detect koala scats is being investigated, particularly as scat surveys conducted by researchers can return a high false negative rate (Cristescu et al., 2015). Experimentally, off-leash dog trials returned a 100% detection rate and was 19 times more efficient than current scat surveys (Cristescu et al., 2015). This study concluded that detection dogs are more cost effective than other survey methods such as human-only detection, camera traps and hair analysis; and that using detection dogs for koalas increases the accuracy and reduces false negatives. Detection dogs will be utilised for the a large scale koala distribution survey on the Northern Tablelands (Northern Tablelands LLS, 2016).

3.2.3 Likely koala habitat: predictive habitat modelling

Important koala habitat areas in NSW are not currently identified state-wide and across all tenures. This hinders conservation of important habitat as agencies across government may not account for important koala habitat across the landscape when making decisions.

Adoption across government of a state-wide, cross-tenure predictive habitat map to guide decisions at government level and inform private land owners, is essential for koala habitat preservation. To produce a state-wide map, a suitable model must be developed.

The state-wide map will be important for managing threats at a population and landscape scale, as it will allow decision makers to see where koala habitat is likely to be and target those areas with additional ground-truthing.

In addition to assisting avoidance of threats related to development, the map will also help government to take further steps to understand threats impacting koalas in particular areas and mitigate these. If the predictive habitat map identifies habitat as suitable but ground-truthing identifies that habitat is not being used by koalas, government can take steps to determine why the habitat is not being used and then manage the threats and encourage koalas to the area. For example, a koala may not use habitat that has poor connectivity or has wild dogs.

In order to expand the model to the whole of NSW, improvements in some underlying environmental data, such as vegetation data are required. There have been significant developments in vegetation data that will be used to inform the model, such as plant community type vegetation data. Further developing plant community type data sets and combining this with browse tree species data and woody canopy data is important to identify koala habitat across the state.

3.2.4 Establishing a single repository for koala genetic information in NSW

Preventing the decline of genetic diversity in NSW is a key factor in protecting the resilience of our koala populations. This is particularly important when there are other population restricting factors present such as Chlamydia. Currently, it is not known if there are any populations free of Chlamydia in NSW. Local extinctions can occur where fertility loss due to Chlamydia and reduced recruitment from habitat fragmentation cause populations to decline (DECC, 2008).

As indicated by the translocated koala population experiences across South Australia and Victoria from a small base, it is valuable to recognise the consequences of low genetic diversity for the koala populations and take steps to avoid this happening in NSW. Low genetic diversity characteristics bring a range of consequences including “*reductions in fertility, survivorship, disease resistance, growth rates and adaptability to environmental changes*” (DECC, 2008). Both Victoria and South Australia now only employ translocation programs in response to the problems of over-browsing, with extremely strict protocols and after considerable consideration (e.g. where risk of death would be high) as it is expensive; has unpredictable success results; and is logistically highly complex (DSE, 2004; DEWNR, 2011).

Managing a number of populations as a meta-population allows for adequate gene flow amongst different sites to ensure that both genetic and demographic integrity of the focus species is maintained. A program of gathering genetic data would therefore strengthen understanding of the health and dynamics of NSW koala populations.

There are a number of different tools available to undertake this form of metapopulation management including molecular genetics, remote monitoring methods, and demographic and genetic modelling software.

To develop our understanding of koala genetics in NSW further, it is essential that the government establish a single repository for genetic material. The Australian Museum in Sydney, as a co-leader of the Koala Genome Consortium and home to the Australian Centre for Wildlife Genomics, is ideally placed to provide this repository where samples could be analysed, provided they were well supported by a genetic diversity sampling program funded by the government. Tissue samples could be taken by koala carers, researchers or veterinarians who deal with koalas that are injured or killed each year. Ecological consultants, licensed under the NPWS's Scientific Licensing arrangements, could also participate in this program.

To ensure its effectiveness, the program would need an administrator to coordinate and facilitate taking and delivering samples to the Australian Museum, and OEH would be well placed to take this role. The administrator's role would include developing appropriate protocols and funding for training of staff (both internal and external), veterinary support, transport arrangements and any other essential support processes. The koala carer guidelines produced by the NPWS (1997) should be amended to support this program, and a similar protocol put in place for ecological consultants. Data and metadata associated with these samples need to be deposited in the SEED Environmental Data Portal.

3.3 A LANDSCAPE APPROACH TO MANAGING AND MITIGATING THREATS

Koala populations need large areas of connected habitat to maintain their viability. Habitat loss and fragmentation has resulted in population decline and has been identified as a significant threat to the species persistence in NSW (DECC, 2008).

Reserves in modified landscapes can help reduce the stresses faced by some koala populations, for example, by limiting the impacts of climate change, vegetation clearing, road kill and in some instances domestic dog attack. Even small reserves can provide important 'stepping stones', connecting habitat and allowing koalas to move and disperse through more extensive but fragmented landscapes.

Formal protected areas, such as national parks, provide a network of lands where threats can be managed and mitigated in a coordinated and systematic manner, for example through the application of regional fire, weed and pest management strategies. National parks may also play an increasingly important role in enabling koala populations (and other threatened species) to adapt to the effects of climate change.

Protection measures on private lands, whether through formal arrangements such as biobanking or conservation agreements, or informally through information and educational initiatives such as Land for Wildlife, are critical to ensuring healthy koala populations can persist. The Saving our Species program is also intending to work directly with landholders and provide resources to restore and improve koala habitat on private land over the next few years.

The national parks estate provides a solid foundation for landscape conservation and has a key role to play in protecting koalas. However, there needs to be a network of other crown land (that may not be suitable for addition to the parks estate), Aboriginal land and other private freehold land that together provide large tracts of well-connected and managed koala habitat across regions.

To be effective, conservation efforts to protect koalas will require measures on private and public lands, with actions based around an understanding of the species' needs from a landscape perspective.

Habitat restoration and revegetation can offer the potential to restore habitat for koala populations. A study of young tree plantations on the Liverpool Plains showed that 4-7 year old plantations of River Red Gums (a known koala browse species) were preferentially used and koalas crossed farmed paddocks to use such areas (Kavanagh & Stanton, 2012). Occupancy of young eucalypt plantations and remnant patches by koalas was strongly influenced by the proximity of these sites to remnant vegetation, indicating that habitat restoration needs to be strategic not random and should consider connectivity in the landscape.

A more recent study demonstrated that koalas need taller trees, and non-feed species with shadier/denser foliage, to provide shelter from heat (Crowther, Lunney, Lemon, Stalenberg,

Wheeler, Madani, Ross, & Ellis, 2014). The planting of both food and shelter trees could connect existing taller mature trees, such as remnant paddock trees, to increase habitat area and connectivity across the landscape. Indeed, genetic analyses suggest that eucalypt timber plantations and regeneration of koala friendly habitat on farmland near Lismore has increased landscape permeability for koalas (Lee, Ellis, Carrick, Corley, Johnston, Baverstock, Nock, Rowe, & Seddon, 2013). However, koalas in commercial timber plantations incorporating browse species are recognised as highly problematic in South Australia. This should be taken into account in NSW (DEWNR, 2011).

3.4 CREATING A CONSERVATION NETWORK

Developing a cross-tenure approach to koala conservation will allow opportunities to be identified where a landscape scale management approach can be implemented that improves connectivity and resilience against key threats. By systematically applying data on the likelihood of koala occurrence, the predictive koala habitat model and threats, we can identify key areas to target for conservation management and action. OEH land managers and agencies with significant land portfolios could work together to develop cross-tenure conservation efforts where they are likely to be most effective for addressing threats.

3.4.1 Opportunities for conserving habitat on private land

One of the major barriers for private landholders to conserving koala habitat is the opportunity cost of forgoing their future development rights by permanently protecting habitat. Another barrier is that there can be actions landholders are required to take to manage habitat (e.g. erecting fences to keep dogs out, tree planting) which involve upfront costs to the landholder.

The Conservation Partners Program, OEH has been supporting conservation on private land for many years and provides some funding to landholders to manage their land for conservation. These funds typically covered the costs of works such as building fences and vegetation restoration but did not compensate the landholder for lost opportunity cost.

The Savings Our Species program and the recently announced Private Land Conservation Program has a budget of \$240 million over five years with ongoing funding thereafter and will provide significant financial incentives for landholders to manage their land for conservation. Under these reforms, programs previously supported by the Conservation Partners Program will be incorporated into the Private Land Conservation Program. Under this program landholders will be able to enter into three agreement types. The different types of agreements have different biodiversity management needs and associated funding, and will be administered by the Biodiversity Conservation Trust.

A key initiative under a future koala strategy could be to use the resources of both the Saving our Species and Private Land Conservation programs for koala conservation on private land. A NSW koala strategy could also provide direction to the proposed Biodiversity Conservation Trust.

3.4.2 Opportunities for managing Crown lands for koala conservation

There are many instances across NSW where Crown lands, whether controlled and managed by state government agencies or councils, contain koala habitat or populations. There are opportunities under the current Crown lands reforms process for the government to identify lands that contain koala habitat and ensure that their future management arrangements will maintain both the koala habitat and any populations that exist on that land.

There are a number of government processes currently underway where these outcomes could be achieved. These include:

- ensuring that crown land with prime koala habitat currently held by the state is retained in state ownership either by the current land manager managing that land for koala conservation or by transferring to the national parks estate
- ensuring state government agencies that have land identified as excess to their needs should assess whether the land contains koala habitat prior to any sale or transfer, and, if so, transfer the land to another agency or council to manage for koala conservation
- as part of the review of the NSW Forest Agreements, Forest Corporation NSW work collaboratively with OEH on a state-wide process to identify uneconomic state forests with koala populations and habitat, and to transfer those parcels to OEH as a priority.

Due to size, location and other uses, public land with good quality koala habitat will not always be suitable for adding to the national parks estate.

3.4.3 Expanding the national parks estate to protect koalas

The national parks estate will continue to be a key component in the network of large tracts of protected habitat needed to sustain the koala in NSW. Under a landscape approach, strategic park additions could complement increasing protection of habitat on other crown land and private land over time.

Using existing information and models on koala habitat and populations, augmented by new information that would be generated under other recommendations in this report, the NPWS should include potential areas of high quality koala habitat in their long term acquisition program. That agency should focus on any areas identified as potential reserve additions or new reserves to align with other conservation efforts on private land, such as rehabilitation of habitats to create suitable corridors for koala movement. This approach should align with NPWS long term reservation strategies.

There is also strong community interest to engage in koala conservation at many levels, such as rehabilitating sick and/or injured animals for release, contributing to habitat rehabilitation, identifying areas for koala habitat protection and participating in koala survey, education and research.

NPWS should harness this community interest and engage with the community, highlighting important areas in the landscape (on both private and public land) and the range of initiatives in which the community can become involved. Areas of existing and proposed additions to the parks estate can be identified to invite community engagement and focus effort in the conservation of koalas.

3.5 EMBEDDING HABITAT INFORMATION INTO THE PLANNING SYSTEM WILL IMPROVE DECISION MAKING

A comprehensive predictive habitat map, combined with the koala likelihood of occurrence map embedded as a regulatory tool in both the local and state government planning system will help ensure that important koala habitat is preserved across the landscape in NSW. The map will influence policy decisions across agencies at early stages, such as the appropriateness of a development being undertaken at a particular location, as well as at a finer scale.

In addition to planning system tools, the map will help decisions to be made by a range of agencies, such as:

- identifying parcels of private land that contain high quality koala habitat, which can improve connectivity between areas of land managed for conservation values and provide refuge from key threats
- identifying management arrangements that would preserve the lands' value to koalas

- ensuring funding mechanisms are available, for example through biodiversity stewardship agreements and biodiversity stewardship payments under the government's Saving Our Species and Private Land Conservation program, to provide private land holders incentives to manage land in a way that benefits koalas
- identifying parcels of Crown land that support connectivity and/or are key to managing threats to a particular population
- transfer of parcels of Crown land to the national parks reserve system as appropriate
- identifying areas to target for dog control and other threat mitigation.

The map will also help private land holders to understand where koala habitat is on their land and in combination with an education program, protect the habitat.

4 RECOMMENDATIONS

The importance of the koala as an iconic species to the community should be formally recognised by government along with a commitment to acting, monitoring and continuously learning so that healthy koala populations can persist.

An effective strategy for koala management should embody the following principles:

- **Act on evidence:** act on the best scientific evidence available, reducing threats based on current understanding while also measuring and monitoring outcomes
- **Recover:** aim to recover the koala by managing and mitigating threats to key koala populations in NSW, managing cumulative impacts in a regional context and improving connectivity across the landscape
- **Learn:** learn by continuously improving knowledge and understanding of how koalas are faring and adapt management approaches.

Several of the recommended measures, particularly those focussed on data and monitoring, will require additional, sustained and dedicated resources.

This review makes 11 recommendations to inform the development of a NSW koala strategy.

4.1 A WHOLE OF GOVERNMENT STRATEGIC APPROACH

Recommendation 1

That Government adopt a whole-of-government koala strategy for NSW with the objective of stabilising and then starting to increase koala numbers.

Government agencies should collaborate to develop a strategy based on the principles of on-ground action, ongoing monitoring and continuous learning. The strategy should identify the actions necessary to manage and mitigate priority threats to key koala populations.

The Office of Environment and Heritage ideally will have ongoing responsibility for the strategy with each agency formally agreeing to deliver the actions assigned to it. An inter-agency forum should periodically review implementation and report to the responsible Ministers about actions taken, outcomes achieved and future priorities. This reporting should be made public.

The strategy should:

- identify key koala populations and management areas which have the potential for long-term recovery and viability
- identify priority threats to key koala populations at the population scale, through mapping and establishing threat hierarchies
- define actions to manage and mitigate priority threats to key koala populations
- prioritise management actions, investment priorities and clearly assign accountabilities and timeframes
- review and align legislative and regulatory arrangements to improve outcomes for koalas across tenures
- establish a framework and specific mechanisms for on-going coordination and cooperation of land managers, policy makers, researchers and the community to deliver the defined actions
- build on the knowledge base in NSW by drawing on experience with koala population management in other jurisdictions, particularly Victoria and Queensland to learn from

past positive and negative experiences, and also learn from approaches and outcomes with other native species

- identify any knowledge gaps that may impede these actions and prioritise them for further research
- evaluate outcomes, consistent with the NSW Government Program Evaluation Guidelines, within five years of commencement of the strategy.

The strategy should specifically address the following recommendations to ensure action is taken to recover key koala populations.

4.2 PRIORITISE INFORMATION FOR BETTER PLANNING AND DECISION MAKING

Better outcomes for koalas will require fit-for-purpose data and monitoring to inform planning and decision-making. There are three priority areas:

- improving data on koala numbers and locations to inform decisions, for example, the prioritisation of areas to be targeted for conservation
- developing predictive koala habitat maps to inform regional planning outcomes and local zoning decisions, guide conservation planning and inform on-ground recovery and restoration
- monitoring koala trends to give confidence in population changes over time, assess the effectiveness of policies, and understand whether NSW is meeting its overall goal for koalas.

These priorities are described in the recommendations below.

Recommendation 2

That Government initiate a program to improve data on the number, location and occurrence of koalas in NSW, including trends over time, taking advantage of new sensor and communication technologies and data analytics within 12 months of receipt of this report.

The Government should act immediately to build a strong evidence base on the likelihood of koala occurrence at a suitable spatial scale across NSW. This program should build on the koala likelihood of occurrence map (Predavec et al., 2015) by targeting gaps in data particularly in priority areas (i.e. where there are potentially higher threats).

These and other available data and mapping should be used to inform management decisions contained in the strategy, such as the identification of areas to be targeted for conservation reserves (recommendation 7).

The Government should implement a plan for trend monitoring of koalas across all tenures at a landscape scale, based on a review of current literature and recent research. The monitoring plan and subsequent analysis should be undertaken annually and be implemented across tenure. The monitoring plan needs to define clear objectives to assess and report on existing mitigation actions for koala conservation across all tenures and activities, and include trigger points that specify the implementation of particular actions when thresholds are exceeded in line with an adaptive management approach.

Given the lack of clarity on koala population status, especially in remote areas away from the coast and in populated areas, a robust monitoring program should aim to provide the following:

- knowledge about the effectiveness of koala policies across all land tenures
- data to give managers, policy makers and the community better confidence in population and distribution trends over time

- information that will assist and improve the development of policies that encourage increased koala protection and enhance their population
- better understanding of the cumulative impacts of threats on key koala populations
- better information to identify targeted areas for further research.

All data collected should be entered into the SEED Environmental Data Portal (extended if necessary to include flora and fauna) so that it is available to government, the community, industry and researchers to use and inform broader actions that support preserving koalas.

Recommendation 3

That Government publish a state-wide predictive koala habitat map within three years of receipt of this report, with immediate priority given to improving coverage of the north coast.

This map will inform regional planning outcomes and local zoning decisions, guide conservation planning and inform on-ground recovery and restoration efforts as outlined in subsequent recommendations.

4.3 APPLYING OUR KNOWLEDGE TO IMPROVE OUTCOMES

Government and the community employ a range of regulatory and non-regulatory approaches to managing koalas, their habitat and threats. Many of the regulatory measures are or have been recently reformed or reviewed, for example, the land management and biodiversity conservation reforms and the SEPP 44 review.

Developing a koala strategy provides the opportunity to review and align the various regulatory approaches to improve outcomes for koalas across different land uses and tenures, using the improved data and mapping to inform better planning and decision-making. The strategy can also ensure that non-regulatory approaches such as incentives for private conservation are aligned with agreed priorities across all tenures.

The following recommendations outline a series of priorities.

Recommendation 4

That Government improve outcomes for koalas through changes to the planning system.

In addition to the current review of SEPP 44, within 12 months of receipt of this report Government should start a broader evaluation of the effectiveness of SEPP 44 as a planning tool and the Comprehensive Koala Plans of Management for protecting koalas and their habitat. This work should also consider how best to incorporate the state-wide predictive koala habitat map (Recommendation 3) and the koala likelihood of occurrence map (Recommendation 2) in combination with state-wide best practice guidelines to inform land-use planning and zoning and to guide development consent.

Recommendation 5

That Government improve outcomes for koalas through the Biodiversity Conservation Bill and associated Regulations.

This should be achieved by:

- ensuring that the koala habitat maps are suitable for use through the Bill and Regulations
- including koala habitat in Category 2 (Regulated Land) on the native vegetation regulatory map and identifying and implementing controls as appropriate
- including predictive koala habitat and likelihood of koala occupancy information in the Biodiversity Assessment Method (BAM) threshold sensitive values map

- considering including impacts on the best quality koala habitat as 'serious and irreversible impacts'.

Koalas should also be included in the monitoring programs to be established under the new Bills.

Recommendation 6

That Government investigate models for guiding and incentivising collaborative best practice for new development and ongoing land use occurring in areas of known koala populations across tenures, industries and land users.

Guidelines should be developed to improve the design of new developments in koala habitat and direct mitigation measures. It is also recommended that Government develop best practice principles for Koala Plans of Management for State Significant Development mining projects occurring in areas with known koala populations.

In addition to these guidelines and principles, Government should also investigate incentive models for industry implementation of best practice, encouraging and rewarding innovative approaches. For example, this could take the form of an accreditation or rating system for companies or developments that exceed expectations in Environmental Impact Assessments and for 'koala-friendly' design and development. This could apply to all major land use change that may impact koala habitat across all tenures, industries and land users.

Recommendation 7

That Government agencies identify priority areas of land across tenures to target for koala conservation management and threat mitigation.

The Office of Environment and Heritage should work with land managers and agencies with significant land portfolios to apply the likelihood of koala occurrence data systematically (Recommendation 2), the predictive koala habitat map (Recommendation 3) and regional scale threat information to identify priority areas to target for conservation management and threat mitigation.

Looking across all land tenures will allow opportunities to be identified where a landscape scale management approach can be implemented that improves connectivity and resilience against priority threats.

This work should commence with the north coast by:

- identifying parcels of public land that support connectivity and/or are key to managing threats to populations so that they are managed for conservation values
- identifying parcels of private land that contain koala habitat that can improve connectivity and provide refuge from priority threats and identifying voluntary land management arrangements that would preserve the lands' value to koalas. Private land holders should be incentivised to manage their land in ways that benefit the koala through funding mechanisms such as biodiversity stewardship agreements and payments under Saving our Species and Private Land Conservation programs
- identifying appropriate management arrangements for parcels of public land including through addition to the national parks reserve system or arrangements with Aboriginal Land Councils
- identifying priority areas of land for restoration
- identifying target areas for dog control and other threat mitigation.

The Office of Environment and Heritage should also work with Roads and Maritime Services and councils to identify koala road kill hotspots at a fine scale and determine the feasibility and likely effectiveness of preventive mitigation.

4.4 OPPORTUNITIES FOR THE SCIENTIFIC AND BROADER COMMUNITY TO DIRECTLY CONTRIBUTE

Community based action to address threats to koalas and their habitat will be essential for koala recovery. These actions come in many forms such as the work of koala carers and rehabilitation groups, local Landcare and habitat restoration groups, investment funding by Local Land Services, the work of non-government organisations and the on-ground works funded through the Saving Our Species Iconic Koala Project. Our research community and local councils are also important partners for meeting the goals of the strategy.

The following recommendations outline a series of actions for collaboration between Government, the community and researchers.

Recommendation 8

That Government, through the Office of Environment and Heritage, convene two symposia within 12 months of receiving this report: one for scientists active in koala research and land managers to develop a koala research plan; and one focussed on koala rehabilitation to identify actions to optimise the delivery of and support for the network of koala rehabilitation groups and carers.

The koala research plan should build on the koala research priorities identified in the strategy and provide seed funding to support researchers to build collaborative grants applications such as Australian Research Council and Environmental Trust bids.

A biennial symposium, organised and facilitated by OEH, should refresh the koala research plan and share research findings to feed back into the strategy's delivery. General outcomes of the symposium should be agreed upon and made available to community members and land managers in a suitable form to permit them to act on the best available science.

An immediate set of research priorities has been identified through this review. These include knowledge gaps relating to key koala populations:

- better understanding of the impact of managed and wild fire on koala habitat
- local population movements and viability in relation to connectivity, roads and dogs
- cumulative impacts on koala populations from pressures of native forest harvesting, fire and dogs
- effectiveness of offset and rehabilitation activities
- cumulative impacts on koala gene flow from fragmented habitat and populations
- results from the Koala Genome Consortium to better inform disease research including chlamydia and koala retrovirus (KoRV)
- climate change impacts and identification of climate refugia
- key socio-economic and institutional barriers to the effective implementation of koala conservation strategies
- effectiveness of management strategies to minimise impacts on koala populations including development consent for residential subdivision and mitigation activities for reducing mortality on roads.

Within six months of receipt of this report, it is recommended that a priority research project is commenced to better understand how koalas are responding to regeneration harvesting forestry operations on the mid-north coast of NSW. The project will assess the effectiveness of current and proposed prescriptions designed to mitigate the impacts of forestry operations on koalas in these areas.

The second symposium, also organised and facilitated by OEH, should focus on koala fauna rehabilitation to identify actions to optimise the delivery of and support for the network of koala rehabilitation groups and carers.

This would include:

- examining different models of operation and discussing challenges faced by the network of fauna rehabilitation groups and carers and how they might be overcome
- discussing how to maximise responsiveness, improve or standardise triage and clinical practices to increase survival and return to the wild rates
- standardising data collection so this information can be used as a metric in reporting the success of the koala strategy as well as being made available for scientific research purposes.

The symposium should include representatives of the Veterinary Association and scientists working on koala research to aid the continuous learning of these groups.

Recommendation 9

That Government establish the Australian Museum as a preferred repository for koala genetic samples in NSW, and all data and metadata associated with these samples should be deposited into the SEED Environmental Data Portal (extended if necessary to include flora and fauna).

Government should develop and fund a program to collect genetic information from tissue samples taken from all injured and deceased koalas across the state for analysis in accordance with an agreed protocol. The program should be administered and implemented by OEH and provide the necessary protocols, funding, training, veterinary support, transport arrangements and other necessary support for carers and researchers to take and deliver samples to the Australian Museum. The koala carer guidelines produced by the National Parks and Wildlife Service should be amended to support this program, and a similar protocol put in place for ecological consultants under the NPWS's Scientific Licensing arrangements.

Recommendation 10

That Government facilitate the exchange of information among land managers, local government, the research community and the broader community.

To allow an adaptive management approach to be used by land managers, information flow between researchers and government agencies should be facilitated in real time through the SEED Environmental Data Portal.

Access to the learnings from the koala symposium and the annual reporting on outcomes to the Minister will help the community to act on the best scientific evidence available. To promote the dissemination of these learnings, local koala field days should be held in key centres around NSW where information about koala conservation and management can be exchanged. These should be followed up with booklets, pamphlets and eLearning materials to allow the community to access an information tool kit so they can decide how to best manage their land for koalas and other threatened species.

Also, local councils should be supported to manage local threats to koalas better through the exchange of information.

Recommendation 11

That Government draws on knowledge and shares information with local community members through a program that supports localised engagement between liaison people and residents and industry.

Local knowledge and follow-through is vital. Local residents, Aboriginal traditional owners and community members, Aboriginal Land Councils, farmers, land managers and environmental consultants are holders of considerable detailed local knowledge about koala

populations, occurrence, and threats. Sharing information will be an important approach to developing the koala strategy, and communicating and delivering local initiatives.

Learning from other programs such as the South Australian *Cockies Helping Cockies* program which was developed by the Zoos South Australia to address South-eastern Red Tailed Black Cockatoo recovery (Zoos South Australia, 2015), could provide a way forward to implementing programs and sharing knowledge. The delivery of such a program for koalas in NSW could include employing local residents as the liaison for the discussions and two-way information sharing, as well as rolling out program initiatives.

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Acronyms

AGS	Australian Group Selection
AMBS	Australian Museum Business Services
BAM	Biodiversity Assessment Method
CKPoM	Comprehensive Koala Plans of Management
DBH	Diameter at breast height (tree measurement)
DECC	Department of Environment and Climate Change
DEWNR	South Australian Department of Environment, Water and Natural Resources
DPI	NSW Department of Primary Industries
EP&A Act	Environmental Planning and Assessment Act 1979
EPA	NSW Environment Protection Authority
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
FCNSW	Forestry Corporation of NSW
IBRA	Interim Biogeographic Regionalisation for Australia
IFOA	Integrated Forestry Operations Approval
ISO	International Organization for Standardization
IUCN	International Union for Conservation of Nature and Natural Resources
KoRV	Koala Retrovirus
LGA	Local Government Area
LLS	Local Land Services
LLS Act	Local Land Services Act 2013
NPA	National Parks Association of NSW
NPWS	National Parks and Wildlife Services
NV Act	Native Vegetation Act 2003
OCSE	Office of the NSW Chief Scientist & Engineer
OEH	NSW Office of Environment and Heritage
PNF	Private Native Forestry
PVPs	Property Vegetation Plans
RFS	Rural Fire Service
RMS	NSW Roads and Maritime Services
SEEA	System of Environmental-Economic Accounting
SEED	Sharing and Enabling Environmental Data
SEPP	State Environmental Planning Policies
SSD	State Significant Development
SSI	State Significant Infrastructure
STS	Single Tree Selection
TSC Act	NSW Threatened Species Conservation Act 1995
WID	Wireless Identification Device

Glossary

Abundance a count of animals (i.e. population size, such as the size of the Australian [population of people is 23 million).

Absence data: information that shows areas where there is known koala habitat but have no recorded koala occurrences

Adaptive management: A systematic process for continually improving management policies and practices by learning from the outcomes of previously employed policies and practices.

Biodiversity: Biodiversity is the variability among living organisms from all sources (including terrestrial, aquatic, marine and other ecosystems and the ecological complexes of which they are part), at all levels of organisation, including genetic diversity, species diversity and ecosystem diversity.

Climate refugia: A refugium is an area that has escaped or will escape changes occurring elsewhere and continues to provide a suitable habitat for a species which would not be able to survive under prevailing conditions. Climate change refugia are used in reference to areas that may provide habitat for species displaced as the climate changes.

Connectivity: a management approach that focuses on the maintenance and restoration of functioning natural ecosystems across landscapes and marine areas, and requires systematic conservation planning that:

- identifies management responses at multiple scales
- uses whole-of-landscape or whole-of-seascape approaches
- takes into account the dynamics of climate change.

Cross-tenure: a consistent approach to land management regardless of ownership

Cumulative threats: when more than one threat is present with a potentially combined impact on a species

Defining 'secure' in the wild: the species is in a state (with or without active management) such that there is a 95% probability of having a viable population of the species in 100 years from the point of assessment. A viable population is likely one where: all deterministic threats are controlled; population size is sufficient to avoid demographic/genetic problems; population trajectory is stable or increasing; there is sufficient available habitat for the population to persist.

Environmental offset: measures that benefit biodiversity by compensating for the adverse impacts elsewhere of an action, such as clearing for development.

Endangered: refers to a species facing a very high risk of extinction in the wild in the near future (EPBC Act).

Forest Harvesting: involves cutting trees and delivering them to sawmills, pulp mills and other wood-processing plants. Its practical components include road construction, logging and log transportation.

Genetic diversity: refers to the variety of genetic information contained in individual plants, animals and micro-organisms.

Ground-truthing: information provided by direct observation as opposed to information provided by inference.

Habitat corridor: connections across the landscape that link up areas of habitat.

Habitat fragmentation: the process by which habitat loss results in the division of large, continuous habitats into smaller, more isolated remnants (Didham, 2001).

Healthy koala population: a healthy koala population is defined in the DECC Recovery plan (2008) as:

- “maintenance of existing populations (i.e. no local extinctions)
- improvement of the extent and quality of habitat and protection of priority habitats and sites
- an increase in the numbers of breeding females, together with a corresponding decrease in records of juvenile mortality
- an increase in the general health of animals in the wild (e.g. less overt signs of Chlamydia infection or other illness)
- an expansion in distribution and the presence of koalas in all areas of primary koala habitat
- an increase in community reports of koala sightings.”

IBRA: The Interim Biogeographic Regionalisation for Australia provides a broad level break-up of the Australian landmass into 85 biogeographic regions and 403 subregions. The IBRA bioregions were derived by compiling information on climate, lithology/geology, landform, vegetation, flora and fauna. IBRA provides the national and regional planning framework for developing the National Reserve System.

Key koala populations: populations that have the potential for long-term recovery and viability.

Koala habitat: koala habitat can be defined as forests or woodlands containing koala food and shelter trees and other parts of the landscape that koalas use for movement.

Landscape scale: refers to a spatial scale beyond an individual site. Different scales are recognised in ecology including the patch level (e.g. individual patches and their variability), class level (e.g. forest, agriculture, urban), and the landscape level (all classes considered together). When linking animal movements and landscape structure, home ranges can be proxies to identify scales at which areas of interest (i.e. landscapes) can be defined

Likelihood of occurrence: the probability that a koala is actually present in a particular location.

Metapopulation: a set of local populations which interact via individuals moving among populations (Hanski & Gilpin, 1991).

Persist: refers to the continued existence of a koala population

Population density: a measurement of population per unit area or unit volume.

Presence data: information that shows where koalas have been recorded.

Revegetation: the re-establishment of vegetation in areas that have been cleared or highly modified. The mix of plant species may not be the same as that of the original vegetation.

Translocation: the movement of living organisms from one area with free release in another (DECC, 2008).

Vulnerable: refers to a species facing a high risk of extinction in the wild in the medium-term future (EPBC Act)

Wild dog: refers to all free-living dogs in NSW, including dingoes, feral dogs and their hybrids

APPENDIX 1 TERMS OF REFERENCE

1. Aims and role of the committee

The Chair of the committee (Professor Mary O'Kane AC, NSW Chief Scientist & Engineer) has been asked to establish a committee to undertake a review into the decline of koala populations in key areas of NSW. Following completion of the review, the Chair will provide the Minister for the Environment a report that:

- sets out a framework for a whole of government approach to addressing pressures
- includes core learnings from other programs
- analyses successes/failures
- assesses policy options trialled to date
- considers key koala management policy settings
- identifies knowledge gaps
- recommends possible approaches to address the decline in koala numbers.

It is expected that the report will provide the Minister sufficient evidence from which a koala strategy for NSW can be prepared.

2. Membership

The Chair is requested to ensure that the koala advisory committee comprises at least the following, in addition to the Chair:

- two independent researchers
- members from the following NSW Government agencies:
 - Office of Environment and Heritage (OEH)
 - Environment Protection Authority (EPA)
 - Department of Planning and Environment (DPE)
 - Roads and Maritime Services (RMS)
 - Department of Primary Industries (DPI)
 - Department of Industry Division of Resources and Energy

3. Role of chair

The Chair is requested to:

- actively and regularly engage with the committee
- deliver a report to the Minister
- draw on advice beyond the koala advisory committee if required
- develop evidence-based options to address the decline of key koala populations
- facilitate consideration of the wide variety of agency interests
- apply robust business acumen to decisions
- liaise directly with Minister[s] on behalf of the committee when appropriate
- raise significant matters of concern directly with the Minister[s]
- act as a spokesperson for the committee as required.

While the Chair will consider input and evidence from the committee, the report to the Minister will be the Chair's report. The Chair does not require the committee's consensus or support for the report's recommendations.

4. *Role of members*

- The role of the members is at the discretion of the Chair.

5. *Guiding principles*

The Chair will develop options that consider:

- increasing regulatory efficiency, removing duplication and promoting consistency in approval requirements
- increasing upfront clarity and transparency in environmental standards
- minimising the private costs and maximises the public benefits of the options
- encouraging economic development, including by supporting regional and rural communities without devaluing koalas and their habitat
- building resilience to environmental hazards and risks.

6. *Operating protocols*

Meetings

Meetings will be held regularly (at least one each fortnight) at times to be determined by the Chair.

Agency support officers will have a standing invitation to attend meetings.

Meeting attendance in person should be preferred but may occur via teleconference or videoconference as arranged with the Secretariat.

Secretariat support

Secretariat support for the Chair (and committee) is provided by OEH. This will particularly be in terms of:

- administration including agendas, papers and minutes
- logistics including pre-briefs, meetings and workshops
- appointment of members
- coordination and information flow including between the Minister[s], chair, and members
- contribution to research, analysis, policy development and advice
- supporting stakeholder liaison, communication and engagement.

Committee membership

Name	Position	Agency
Professor Mary O'Kane	Chair, NSW Chief Scientist & Engineer	University of Sydney
Professor Kathy Belov	Professor of Comparative Genomics, Pro Vice-Chancellor	
Michael Crowley	Acting General Manager, Environment	Roads and Maritime Services
Steve Hartley	Director, Public Land and Aquatic Ecosystems Policy	Office of Environment and Heritage
Michael Hood	Principal Manager, Forestry	Environment Protection Authority
Dr Rebecca Johnson	Director, Australian Museum Research Institute	Australian Museum
Dr Brad Law	Principal Research Scientist	Department of Industry - Lands
Steve Murray	Executive Director, Regions	Department of Planning and Environment
Associate Professor Jonathan Rhodes	School of Geography, Planning and Environmental Management	University of Queensland
Susan Shaw	Manager, Cabinet and Parliamentary Services	Department of Industry – Resources and Energy
Paul Wells	Forestry Manager	Department of Industry - Lands
Stephen Wills	Group Director Infrastructure and Land Management	Department of Industry - Lands

APPENDIX 2 OVERVIEW OF LEGISLATION

Act	Purpose	Which agency / Minister administers	Relevance to Koalas
<p><i>Threatened Species Conservation Act 1995</i> (TSC Act)</p> <p>Began 1 January 1996</p> <p>[Note: this Act is proposed for repeal as part of the biodiversity reforms. The sections of TSC Act that relate to listing of species as threatened will transfer to the new Act]</p>	<p>The purpose of the TSC Act is to:</p> <ul style="list-style-type: none"> • conserve biological diversity and promote ecologically sustainable development • prevent the extinction and promote the recovery of threatened species, populations and ecological communities • protect the critical habitat of endangered species, populations and ecological communities • eliminate or manage certain key threatening processes that threaten the survival or evolutionary development of threatened species, populations and ecological communities • ensure that the impact of any action affecting threatened species, populations and ecological communities is properly assessed • encourage the conservation of threatened species, populations and ecological communities through cooperative management. 	<p>OEH Minister for the Environment</p>	<p>The Koala is listed under the Act as Vulnerable and three populations have been listed as Endangered.</p> <p><i>"The TSC Act, through Part 8A of the NSW National Parks and Wildlife Act 1974 (NPW Act) prohibits the harming, picking, possessing, buying or selling of individual threatened species... The Act prohibits damaging their habitat and contains provisions to protect endangered populations and threatened ecological communities."</i> (NSW OEH, 2016)</p> <p>Section 91 of the TSC Act provides for licences to pick, harm or damage the habitat of a threatened species in a range of contexts. Some of these licences issued under IFOAs (see Forestry Act) include particular provisions for protection of koalas.</p> <p><i>"An environmental impact assessment may be required for a proposed development or activity before development consent is granted under the Environmental Planning and Assessment Act 1979 (NSW). The assessment will need to consider whether there is likely to be a significant effect on any threatened species, populations or ecological communities, or their habitats."</i> (NSW OEH, 2016)</p> <p>If a significant impact is likely, a more detailed assessment in the form of a species impact statement (SIS) may be required along with suitable ameliorative measures to address any impacts.</p> <p>Under the act, a recovery plan was prepared for the Koala that takes its objectives from the National Koala Conservation and Management Strategy.</p> <p>Threatened Species Priorities Action Statement</p> <p>The PAS has guided efforts to recover threatened species since 2007. PAS is a list of actions required to recover species, populations and communities listed under the Act. Before the PAS was implemented in 2007, the aim was to develop a recovery plan for every threatened species in NSW. However, the rate of recovery plan preparation was not keeping pace with the rate at which new species were listed.</p> <p>OEH reviewed the PAS in 2011 to evaluate its effectiveness. The review recommended a number of improvements including adopting an explicit management and prioritisation framework. Saving our Species delivers on all these recommendations, and its strategies and projects are designed to be the new PAS for NSW.</p>

			<p>Saving our Species</p> <p>The Saving Our Species program aims to maximise the number of threatened species that can be secured in the wild in NSW for 100 years. It assigns threatened species to different management streams so the individual requirements of each species can be met.</p> <p>The koala is one of six iconic species addressed under the broader saving our species program. "Iconic species are important socially, culturally and economically, and the community expects them to be effectively managed and protected" (NSW OEH, 2016b). Management of iconic species is guided by existing recovery plans. Although there is no legislative power behind the program, the program directs government funding aimed at the conservation of threatened species.</p> <p><i>Changes under the Biodiversity Conservation Bill</i></p> <ul style="list-style-type: none"> • Threatened plants and animals will continue to be listed. • It will continue to be illegal to harm threatened plants and animals and their habitat, unless you have specific approvals, such as development consent or a licence. • Under the proposed Biodiversity Conservation Bill, populations will now be defined as part of a species, to align with IUCN. A population of a particular species will only be eligible to be listed as threatened if its species is not already listed as threatened. • As populations are defined as part of species they will have the following threat categories: critically endangered, endangered or vulnerable (currently populations can only be listed as endangered under the <i>Threatened Species Conservation Act</i>) • The draft Bill allows for a conservation program for threatened plants and animals in NSW to be established, reflecting the approach taken by the Saving our Species program. • A tiered, risk-based approach to managing human-wildlife interactions will be introduced. This approach includes exempt activities (lowest risk), activities that comply with a code of practice (moderate activities), licensed activities (highest risk), and prohibited activities.
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<p><i>Native Vegetation Act 2003 (NV Act)</i></p> <p>Began 1 December 2005</p> <p>[Note: this Act is proposed for repeal as part of the biodiversity reforms]</p>	<p>The purpose of the NV Act is:</p> <ul style="list-style-type: none"> • to prevent broadscale clearing unless it improves or maintains environmental outcomes, and • to protect native vegetation of high conservation value having regard to its contribution to such matters as water quality, biodiversity, or the prevention of salinity or land degradation, and • to improve the condition of existing native vegetation, particularly where it has high conservation value 	<p>OEH Minister for the Environment</p>	<p>The NV Act requires impacts of clearing on threatened species to be avoided or offset in order to improve or maintain environmental outcomes. Koalas are considered in this due to being listed as vulnerable under the TSC Act. Clearing for certain purposes, such as routine agricultural management activities (RAMAs), do not require approval under the Act. However, it must only be undertaken to the minimum extent necessary and within the appropriate scope.</p> <p>This is done via Property Vegetation Plans (PVPs). In the case of Private Native Forestry (PNF), there is a code of practice that includes koala specific measures for PVPs. This includes:</p> <ul style="list-style-type: none"> • not permitting activities in "core koala habitat" for the purpose of SEPP 44 • requiring 20m exclusion zones around trees that a certain number of koala scats have been found beneath • retention of feed trees species at particular rates where there is a record of a koala within 500m of the area or scats are found beneath feed trees. <p>For non-PNF PVPs Threatened Species Assessment Tool allows for clearing where offsets would improve the habitat of specific threatened species to at least the same extent as the habitat values lost through the proposed clearing. The assessment does not allow clearing where impacts are unsustainable for a local population of a threatened species.</p> <p><i>Changes under the Biodiversity Conservation Bill</i></p> <ul style="list-style-type: none"> • The new Native Vegetation Regulatory Map will underpin the new land management framework under the LLS Act. For native vegetation clearing, land is mapped as exempt (i.e. clearing can occur without approval), regulated (i.e. clearing is regulated either as an allowable activity, under a code of practice, or with approval under the LLS Act) or excluded (i.e. clearing is not covered under the land management framework). Clearing within core koala habitat does not qualify as 'code based' clearing. • Further detail - https://www.landmanagement.nsw.gov.au/ecologically-sustainable-development/ecologically-sustainable-development-submission-guide/ • A new Biodiversity Conservation Trust will enter into and administer private land conservation agreements with landholders. • The NSW Government has committed \$240 million over five years to private land conservation and \$70 million a year (escalated for inflation) ongoing thereafter, subject to performance reviews. • The Bill requires preparation of a Biodiversity Conservation Investment Strategy to target investment to priority areas.
<p><i>National Parks and Wildlife Act 1974 (NPW Act)</i></p> <p>Began 1 January 1975</p>	<p><i>"The NPW Act is a broad piece of legislation that covers a number of different areas including reserving lands, managing certain reserved lands, the protection of Aboriginal objects and places, the protection of fauna and the</i></p>	<p>OEH Minister for the Environment</p>	<p>Habitat: includes habitat periodically or occasionally occupied by a species, population or ecological community.</p> <p>"Fauna: The Chief Executive of the OEH is the authority responsible for the protection and care of fauna. Under the Act it is an offence to harm protected fauna. It is also an offence to harm threatened interstate fauna. In addition, the Act regulates the trade –</p>

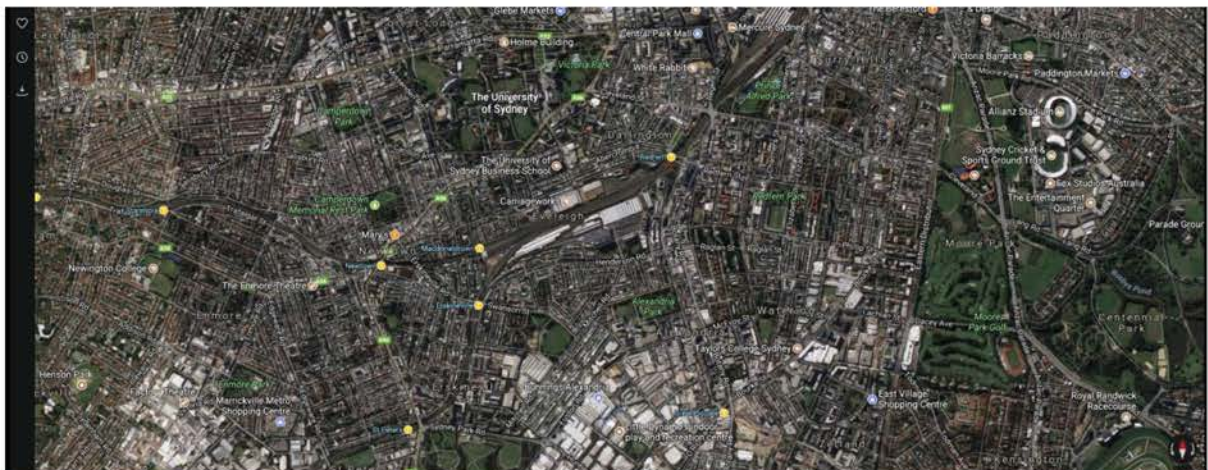
	protection of native vegetation.” (NSW OEH, 2015)		including buying, selling, possession, import and export – of protected fauna. Protected fauna includes all fauna other than locally unprotected fauna, interstate threatened species, endangered populations, or endangered ecological communities. Unprotected fauna and threatened interstate fauna are specified in schedules to the Act. The Act allows for the issuing of licences to authorise a number of different activities relating to fauna. In some cases, such as where crown forestry activities are conducted in areas without an IFOA, a licence under S120 of the NPW Act is used. The holding of a valid licence and complying with the conditions of such a licence is a defence to prosecution under the Act.” (NSW OEH, 2015)
<p><i>Environmental Planning and Assessment Act 1979</i></p> <p>Began 1 September 1980</p>	<p>Objects of the Act includes: to encourage the “protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats.”(NSW Government, 1979)</p>	<p>DPE Minister for Planning</p>	<p>Consent authorities must consider the impacts of actions on threat-listed species listed under the <i>Threatened Species Conservation Act 1995</i>. This is specified in the objects of the act and must be considered for all development assessments, but the Act also allows for issue-specific policies to be prepared, such as State Environmental Planning Policies (SEPPs). These require specialist consultation in regards to threatened species listed under the TSC Act. SEPP44 directly relates to koala conservation and is outlined below. The Act also includes provisions for Councils to prepare a planning proposal, including a Local Environmental Plans (LEP), which may include specific provisions relating to Koalas.</p> <p>The Act also establishes the development assessment and approval framework for all major projects. This is outlined under the Biodiversity Offsets Policy. The Framework for Biodiversity Assessment that underpins this policy sets out detailed guidelines for determining the location of threatened species in a proposed development site, and steps to be taken to minimise impact.</p> <p>Exploration and mining activities All new mining projects, and modifications to existing projects, require approval before they can commence. As part of this approval process, the proponent must prepare an Environmental Impact Statement, which covers a range of issues, including flora and fauna and landscape management. If a project is approved conditions may be imposed to minimise environmental impacts or require future rehabilitation. Compliance - Environmental Sustainability Unit (ESU) within the Department of Industry, Resources and Energy, to ensure compliance with environmental regulations under the EP&A Act and the <i>Mining Act 1992</i>.</p> <p>Roads and Maritime Services Roads and Maritime Services NSW (RMS) also has a responsibility under the EP&A Act when considering development projects. The majority of RMS's projects are assessed under part 5 of the Act. This assessment is often documented in a review of environmental factors. Projects that qualify as State significant infrastructure are assessed under part 5.1 of the Act. This assessment is documented in an Environmental Impact Statement (EIS). The agency has also developed best practice guidelines for Biodiversity to minimise impact on flora and fauna and habitats.</p>

			<p>SEPP 44</p> <p>This SEPP encourages the conservation and management of areas of natural vegetation that provide habitat for Koalas, in order to ensure that permanent free living populations are maintained over their present range and to reverse the current trend of koala population decline. It requires the consideration of potential and core koala habitat before development consent can be granted.</p> <p>SEPP 44 applies to land greater than 1 hectare within the councils listed in Schedule 1 for which a development application has been made and Council is the determining authority. SEPP 44 does not apply to land listed under the <i>National Parks and Wildlife Act 1974</i>, or the <i>Forestry Act 1916</i> as State Forest or flora reserve, or to land where Council is not the determining authority.</p> <p>SEPP 44 also includes recommendations for Councils to prepare Comprehensive Koala Plans of Management (CKPoMs) and to include specific provisions in their LEPs. CKPoMs allow for the objectives of SEPP44 to be met, but remove the need for individual plans at the development application stage.</p> <p>Definitions of koala habitats under SEPP 44 (NSW Government 1995): <i>"Core koala habitat means an area of land with a resident population of koalas, evidenced by attributes such as breeding females (that is, females with young) and recent sightings of and historical records of a population."</i></p> <p><i>"A potential koala habitat means areas of native vegetation where the trees of the types listed in Schedule 2 constitute at least 15% of the total number of trees in the upper or lower strata of the tree component."</i></p> <p>Changes under the Biodiversity Conservation Bill</p> <ul style="list-style-type: none"> • The biodiversity assessment method (BAM) will be used to assess biodiversity impacts of developments that need consent under the EP&A Act that are likely to have a significant impact on threatened species (i.e. above a 'threshold'). • The proposal for the threshold includes the concept of a 'sensitive values map' (i.e. if clearing is proposed within an area on the sensitive values map, the biodiversity assessment method would apply). This map has not yet been prepared. Core koala habitat could be included on the sensitive values map (i.e. clearing of core koala habitat would trigger assessment using the biodiversity assessment method). • The BAM is a metric-based tool that expresses biodiversity impacts in terms of 'biodiversity credits'. A biodiversity impact must be offset by retiring credits, in accordance with offset rules that will be set out in regulations. • Further detail - https://www.landmanagement.nsw.gov.au/ecologically-sustainable-development/ecologically-sustainable-development-submission-guide/
Rural Fires Act 1997	"For the protection of infrastructure and environmental, economic, cultural,	Rural Fire Service	"Bush Fire Management Committees (BFMCs) are responsible for the preparation of bush fire risk management plans which outline strategies for the reduction of bush fire

Began 1 September 1997	<i>agricultural and community assets from damage arising from fires” (NSW Government, 1997) and the protection of the environment by requiring certain activities to be carried out having regard to the principles of ecologically sustainable development described in section 6 (2) of the Protection of the Environment Administration Act 1991.</i>		<p><i>hazard. These plans may also identify areas where hazard reduction activities are prohibited or restricted on the basis of their likely impact on flora, fauna, cultural heritage or other assets. BFMCs are also required to prepare plans of operations which outline procedures for suppression of wildfire.</i></p> <p><i>For most threatened species (including koalas), adverse impacts resulting from hazard reduction are managed through general amelioration prescriptions. However, species-specific ameliorative measures have been developed for a selected list of threatened species that are particularly susceptible to hazard reduction” (DECC, 2008)</i></p> <p>This includes all species listed as threatened under the TSC Act, as well as koalas.</p> <p>BFMCs are also required to act consistently with the provisions of recovery plans for threatened species.</p>
<i>Companion Animals Act 1998</i> Began 1 September 1998	<i>“To provide for the effective and responsible care and management of companion animals.” (NSW Government, 1998)</i>	Office of Local Government	<p><i>“The Companion Animals Act 1998 requires that local councils identify management strategies for companion animals through strategic companion animals management plans. For example, councils can designate certain public lands as off-leash exercise areas and can identify other areas where dogs and cats are prohibited, including wildlife protection areas. The Act also enables council officers to manage stray and aggressive dogs and cats through enforcement(DECC, 2008).” (DECC, 2008)</i></p> <p>This can assist with koala management by protecting possible koala habitats from disruption caused by domestic and stray animals, and in some cases may possibly prevent koala injury or death.</p>
<i>Forestry Act 2012</i> Began 1 January 2013	The Forestry Act integrates the regulatory regimes for environmental planning and assessment, to protect the environment and conserve threatened species. <i>“Parts 5A and 5B of the Act deal with Forestry Agreements and Integrated Forestry Operations Approvals (IFOAs) that were formally established under the Forestry and National Park Estate Act 1998. IFOAs apply to forestry operations in State forests and other Crown-timber lands, except in the national parks estate, and can be granted in areas covered by a forestry agreement.” (NSW EPA, 2016a)</i>	DPE and DPI Parts 5A and 5B of this Act are administered by the Minister for the Environment. The remaining parts are administered by the Minister for Primary Industries.	<p>The EPA regulates the Forestry Corporation of NSW (FCNSW) native forestry operations under Integrated Forestry Operations Approvals (IFOAs). Conditions in IFOAs make Forests NSW responsible for reducing the risks to koalas when they are conducting forestry operations. Some requirements include:</p> <ul style="list-style-type: none"> • searching certain vegetation for koala use • applying exclusion zones where evidence of koala use meets certain thresholds. • retaining koala feed tree species at certain rates across areas where evidence of koala occur.

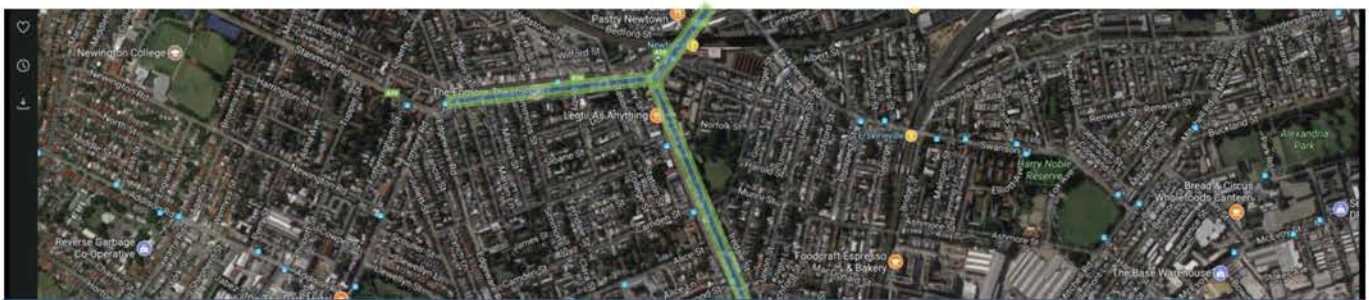
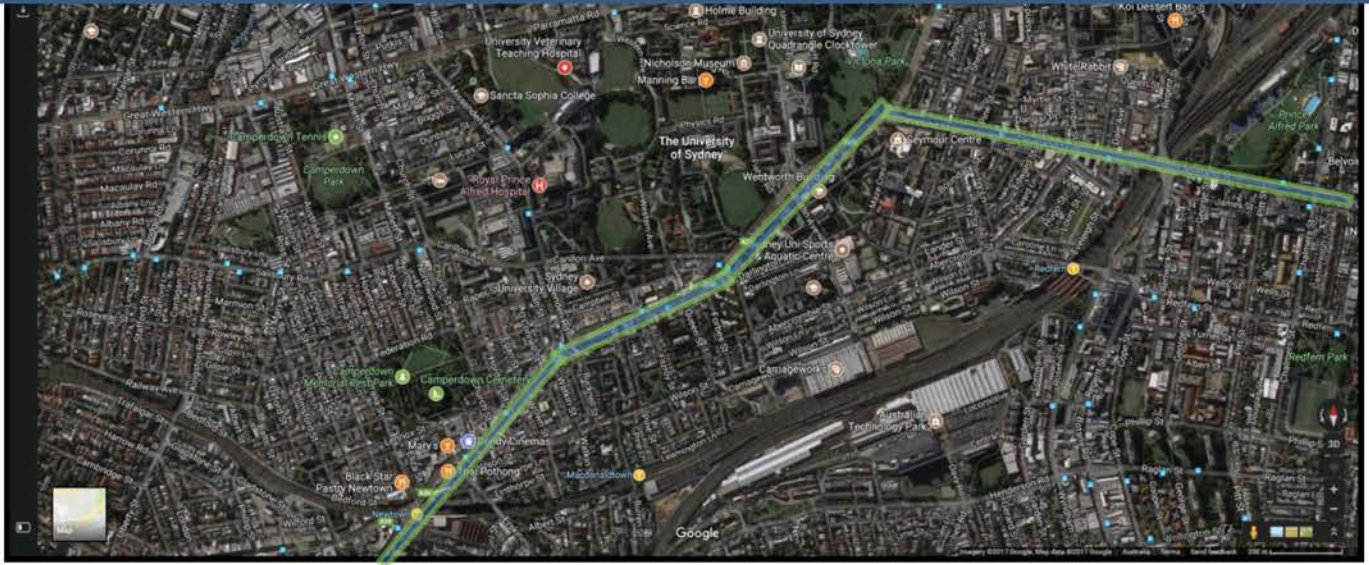
<p><i>Commonwealth Environmental Protection and Biodiversity Conservation Act 1999</i></p> <p>Began 16 July 2000</p>	<ul style="list-style-type: none"> provide for the protection of the environment, especially matters of national environmental significance conserve Australian biodiversity control the international movement of plants and animals (wildlife), wildlife specimens and products made or derived from wildlife promote ecologically sustainable development through the conservation and ecologically sustainable use of natural resources. (Australian Government, 2013) 	<p>Federal Environment Minister</p>	<p>“Koala habitat: any forest or woodland containing species that are known koala food trees, or shrubland with emergent food trees. This can include remnant and non-remnant vegetation in natural, agricultural, urban and peri-urban environments. Koala habitat is defined by the vegetation community present and the vegetation structure; the koala does not necessarily have to be present.</p> <p><i>The Department strongly encourages proponents to engage qualified specialists to carry out surveys prior to making an assessment of their action or submitting a referral, to provide adequate information on the following habitat attributes: Koala presence (and potentially abundance or density); Vegetation composition; Habitat connectivity; Existing threats to koalas; Recovery value.” (Australian Government, 2014)</i></p> <p>The combined Koala populations of Queensland, New South Wales and the Australian Capital Territory were listed as Vulnerable in 2012.</p> <p>An action that is likely to have a significant impact on a matter of national environmental significance (including species listed as Vulnerable under the Act), must be referred to the Commonwealth Minister for the Environment for assessment and approval.</p> <p>A recovery plan is currently being prepared for the Koala under the EPBC Act.</p>
<p>National Koala Conservation and Management Strategy (2009-2014)</p> <p>Began 5 November 2009</p>	<p><i>“The National Koala Conservation and Management Strategy aims to conserve Koalas by retaining viable populations in the wild throughout their natural range.” (NRMMC, 2009b)</i></p>	<p>Federal Environment Minister</p>	<p><i>“The strategy operates at several different geographic scales:</i></p> <ul style="list-style-type: none"> <i>At the national and state scale, the strategy provides a framework for coordinated cooperation and strategic action amongst the wide range of stakeholders in Koala conservation. It sets priorities and focuses attention on the most important issues. The strategy also provides for the development of cost-effective tools to guide action at different scales.</i> <i>At the local scale, the strategy aims to improve the awareness of communities and authorities that live with koalas, and to provide relevant support and assistance for devising and implementing effective conservation actions.</i> <p><i>The strategy does not provide any legislative powers. It is a policy document that provides priorities and directions for action.” (NRMMC, 2009b)</i></p> <p>The strategy has now expired and the intention is to replace it with the recovery plan that is due to be finalised by the end of 2016.</p>

A Local Area Study of the Road Congestion in the NEWTOWN AREA may be extended to the GLEBE and Ultimo areas. To see if it is possible to reduce car use in the area, and allow an easier thru traffic route thru the regional area, so the TRAFFIC can bi-pass the Central CBD area with LIGHT RAIL running down the GEORGE STREET from CENTRAL to Circular Quay.



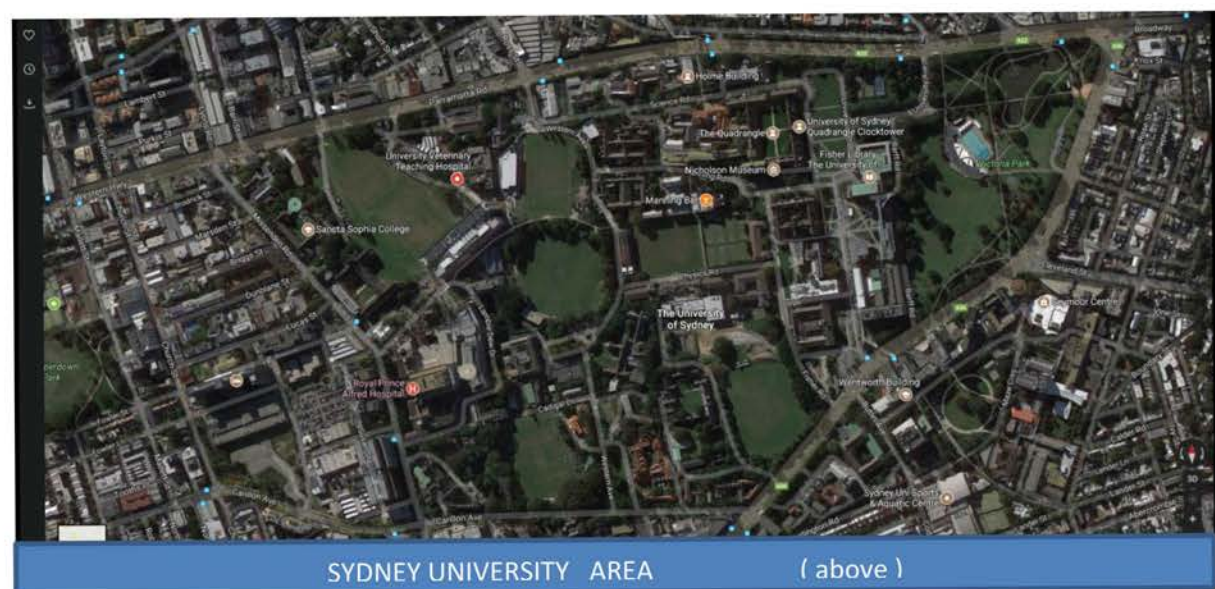
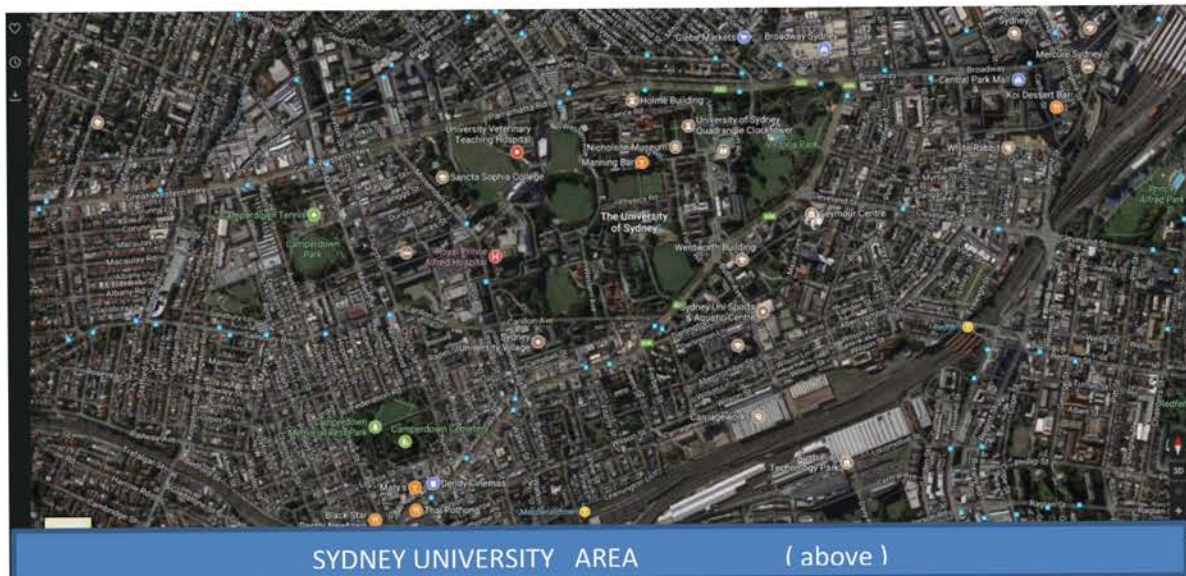
The Existing Rail Lines flow thru Redfern to St Peters and divide off before Newtown so having a STATION built at Sydney Uni is a short " branch Line away ". It was considered before the WATERLOO GREEN STATION was selected.

A Subway Roadway is an option between City Road, Victoria Park and King Street, St Peters the STUDY could extend to Cleveland Street, and then assess traffic on Parramatta Road thru Broadway turning left to Fish Markets.



From Sydney Park a SUBWAY is proposed to be built along King Street to City Road Newtown to Sydney Uni (or a diversion road designed) This may result in a electric bicycle-way street at GROUND LEVEL.

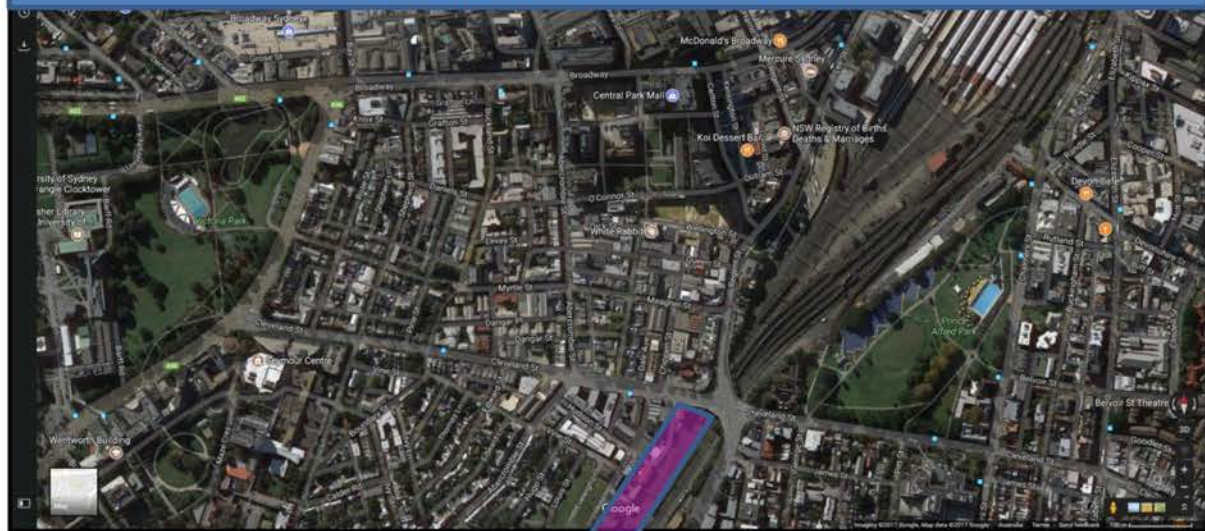






REDFERN - WATERLOO AREA (above)

CHIPPENDALE AREA (below)



- The Light Pink = High-Line Park over Rail Corridor to Cleveland Street
- This may be utilized for “ First Peoples Space “ in a Cultural Area / Cultural Space Concept in Redfern. This may “ evolve “ and “ use First People Dream – Time Stories “ to create a unique High-Line Park.
- This is just an option at Present using the “ air-space “ above the Rail Lines in Redfern Area.



NEWTOWN STATION Area - Light Blue area is “ study for subway thru Newtown Shops “ .

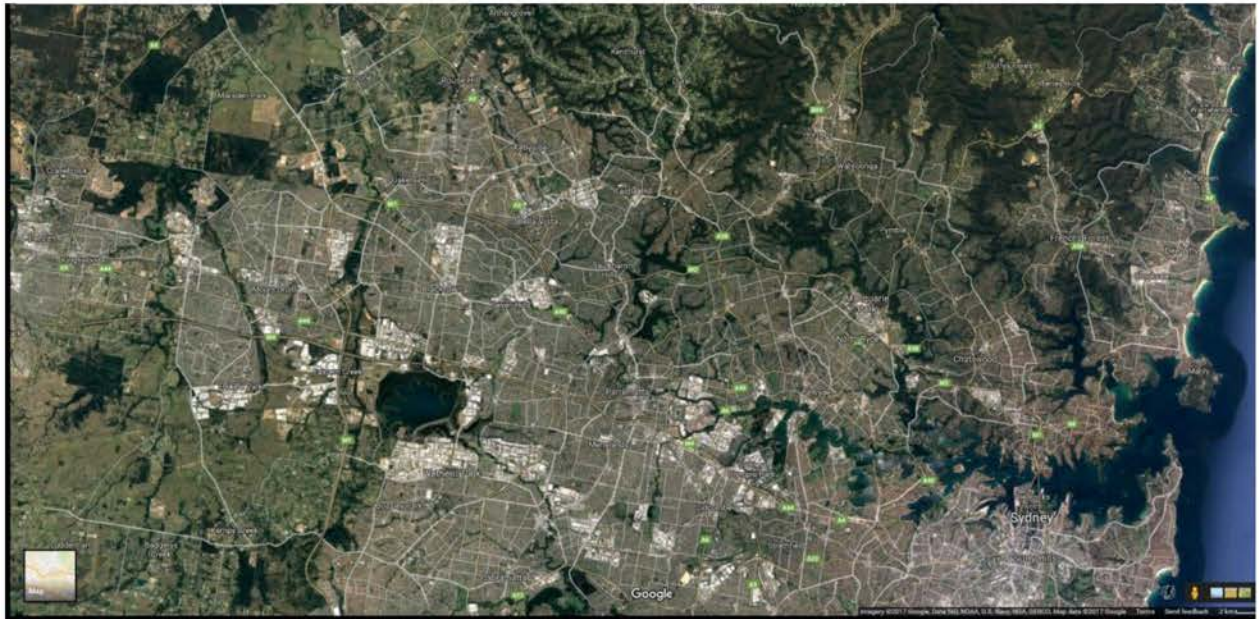


St PETERS STATION Area. - Light Blue area is “ study for subway thru Newtown Shops “ .

- Light Green is the “ conceptual Greenway extending to Royal National Park, from Sydney Park.

WEST CONNEX + SYDNEY METRO

+ Regional Bio-Diversity Corridors (Revised Sydney Green Grid)



“ Critical Thinking “ and “ innovation “ is a New University Degree at UTS

which has the Institute of Sustainable Futures.

What is missing is the Bio-diversity Grade Corridor thru Metro Sydney as part of a revised version of the Sydney Green Grid (which won a National ALAI award last year, but failed to design a viable bio-diversity Corridor over the Greater Sydney Metro area) So why is the Office of Government Architect “ unable to design viable Ecological Corridors ? Daniel Bennett ALAI President talks of a “ SOLUTION that transcends the “ Silo thinking “ within State Govt. The “ SILO Thinking “ focus of RMS road projects in late1960’s was “ WIDE MULTI-LANE highways thru the Inner City now converted to ROAD TUNNELS but if the Population Target is not 5 million but 8 million the Transport Solution may need “ Critical Thinking “ and “ innovation “ to adapt to an 80% increase in population. The UTS Course Leader in the “Critical Thinking Course “ favoured a FAST TRAIN for the East Coast than a Western Sydney Airport.

In trying to “ conceptually design “ a Lane Cove to Royal National Park bio-diversity corridor it is obvious that there is NO Lane Cove National Park in the Inner West and Inner South West of Sydney, so using the AIR-SPACE above the RAIL or ROAD (freeway or Toll-road) network is the “ next best solution “ using “ innovation “ in landscape construction that allows “ Green Roofs “ to be vegetated.

The “ demolish 5 km of Houses and Factories option was rejected by the NSW OEH staffer in the Threatened Species Unit some years ago, so the other alternative was to use a TWO LEVEL solution within the Inner West Light Rail Corridor . Light Rail at Ground Level + a Bio-diversity Corridor above of 10 m to 30 m wide.

The “ funding “ may come from a “ Value Capture “ on the 80% increase in Population in Sydney predicted by former NSW Planning Minister, Rob Stokes MP, and mentioned by Daniel Bennett, President (or Past President) of ALAI, in his essay on the Sydney Green Grid (attached file) .

So the revised SYDNEY GREEN GRID can (if the West Connex was abandoned for South and M4 to M5 sections as proposed by Clover Moore in Appendix 3) extend to SYDNEY PARK from Royal National Park, and from Royal National Park to Lane Cove, but needs the “ abandoned Inner West Greenway “ to be revised and built. Based on Ecologist expertise the width for a Regional Bio-diversity Corridor is not 3 m wide and dis-continuous, but 30 m wide if space is available. The Bird Flight Path of 100 m wide (Small and big birds) is already part of the Inner West Greenway Concept proposal.

INTERNATIONAL CITIES are building RAIL LINES in Traffic Congested Cities.

In Bangladesh, they have a 160 million population, and the country is not as rich as Australia, but they have 100 million Mobile Phone users, that can use the Mobile Phone as an “ office –less “ banking system. Daka the main city has a large population and Traffic Congestion, so it has a Japanese Railway Enterprise installing a subway system for that city, which will “ speed up “ travel “ thru the city.

In Ho Chi Minh city in Vietnam, they are building a subway system to reduce the traffic congestion issues.

So the capacity of an electric car movement system, is not as great as a Train Line Capacity.

Listening to a Boeing Aircraft Executive years ago, talking to his Australian mate (probably both Vietnam Veterans) as they were walking to the Harbourside Viewing of the Sydney to Hobart Yacht Race, it was OBVIOUS that RAIL FREIGHT was a business that saved Boeing from going broke when aircraft manufacture was low.

So the Lesson here is that branch lines were sold in the US and local Freight Operators were able to “ intergrate “ with road freight locally. So in SYDNEY the FREIGHT LINES are “ restricted “ by the Passenger Commuter Train Lines. So assessing a RAIL FREIGHT solution “ upgrade “ may be more sensible but “ initially difficult “ to achieve “ critical thinking “ solutions and “ innovation “ .

The alternative, is to look at the Swedish model, that has 100 % electrified Freight (using renewable Power) and Electric Overhead Power supply for Road Haulage, routes.

So increasing the RAIL FREIGHT capacity between Sydney and Newcastle could be achieved by a NEW second TRAIN LINE available for Commuter Trains leaving the other for 24 hour Freight use.

These are “ complex transport network issues “ which are difficult to assess and understand at “ first glance “. But in Kiama, a Freight Train went past with 30 carriages behind a train, so that is a simple example. Coal Export uses Trains from Coal Mine to Sea Port.

In Sydney the Freight is a large Import flow from Port Botany outwards (to intermodal Terminals ?) , so the media reports favour RAIL FREIGHT distribution systems.

THE ALTERNATIVE RAIL SOLUTION – for the Sydenham to Bankstown Line

As Clover Moore, Mayor of City of Sydney has opposed the West Connex project, and proposed her own “re-design”, looking at the merit of “re-locating” the Sydenham to Bankstown Line seemed a “kids play” method to increase the capacity of Public Transport regionally, by 100 % plus (with option of express train from Liverpool to St Peters area).

So the SYDNEY METRO train system is re-directed to a an ELEVATED TRAIN ROUTE from St Peters to Liverpool using the existing train line to WOLLI Creek area then using the Air-space above the M5 West. The reduction in “demand” for the M5 East Tunnel may be “quantified” by Transport Experts at Inner West Council and City of Sydney .

Transport Planner Ken Welsh at Inner West Council, may be able to evaluate the “impact” that extra train capacity will have, and if the SPEED of Train Travel has any impact. This is important as in Japan there is different speeds for even the “FAST TRAIN” with all-stop Fast Train and Express Fast Train Trips (costing more) .

So the “critics” of Sydney Metro may analyse the Travel Speeds achievable with only one track each way, thus preventing “express higher speed trips” along the route.

When travelling to Blue Mountains last summer, a group of European (German + Swiss) 20ish passengers, started talking about the train being slow, and in German the train would be arriving, in Blue Mountains (here it's a 2 hour trip) but they imagined the arrival when the train was at Mount Druitt. They were correct, if travelling on a FAST TRAIN in Germany (that may travel at 250 kph or 350 kph) instead of 80 kph.

So the “Critics” may wish to “by-pass the City” stops to get to Liverpool “the NEXT GREAT CITY” from North-West Sydney Region.

To achieve that “wish list” a re-routing of the proposed Sydney Metro (or its alternative vision) could travel thru St Peters Station to Sydney Uni Station then to Ultimo, and Pymont (Fish Markets) White Bay, and then go to NORTH WEST SYDNEY AREA via the VICTORIA ROAD route.

This would also “reduce the need” to drive cars on Victoria Road route , and have a task to “quantify” the impact by Transport Planner at Inner West Council ??? .

This “ALLOWS” a North West to South West Train Line to Utilise the “SMART DOUBLE DECKER” train system (which is just a concept on a desk-top at present), that in Germany is a “innovation concept” to increase capacity of TRAIN LINE.

The SYDNEY METRO (current State Govt concept) is proposed to operate a 2 minute intervals at peak, and at 4 minute intervals when the Castle Hill and Cherrybrook stations open.

By looking at the European Example, they have a Network of FAST TRAINS between major destinations. This reduces the need to commute by Airplane, in Europe.

There is an Express Train in the late afternoon to Blacktown and Penrith which is a Fast Trip compared to an all-stops trip time. This type of RAIL OPERATION requires a FAST TRAIN LINE to “bypass trips the stop at all Stations” .

THE WEST CONNEX – and the SYDNEY GREEN GRID

In Japan there are a number of Cities between Tokyo and Kyoto, but in Sydney the TRAIN NETWORK upgrade is based on MATRIX but RADIAL NETWORK focussing on SYDNEY CBD,

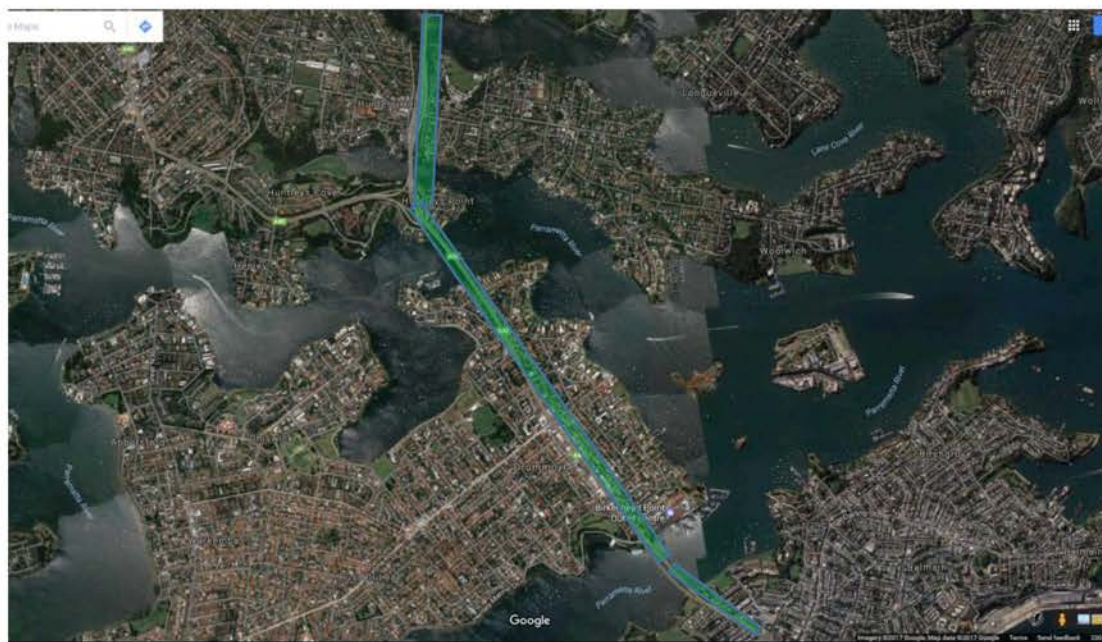
This is true with both the SYDNEY METRO and WEST CONNEX “concept design” instead of focussing “on a City of Cities” with Parramatta the “NEXT GREAT CITY” complete with a UNESCO World Heritage Precinct at North Parramatta. (instead of allowing URBAN GROWTH NSW to destroy the Tourism Potential of the Heritage Precinct). This is achieved by “re-locating the Urban Uplift” to the CBD of Parramatta (or ?) (out of the UNESCO Heritage Precinct area, by increasing the “Height Limit with the CBD, as the Tallest Buildings are now 95 storeys in Parramatta CBD area.

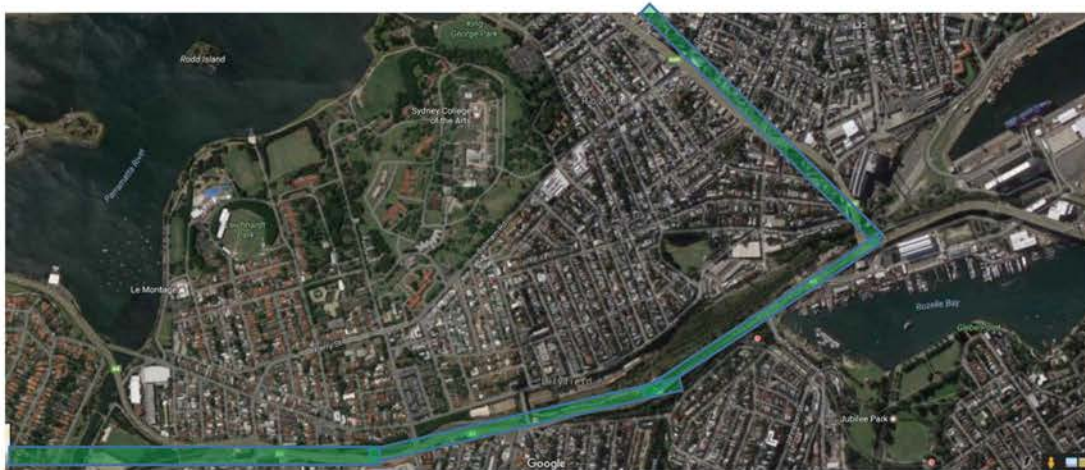
To construct a Regional Bio-diversity Corridor from Lane Cove National Park to Royal National Park is a Challenge when there is NO Linear National Park between both National Parks .

So looking at the Existing RMS and RAIL CORRIDORS to “TRANSEND the SILO THINKING” by providing an “intergrated solution” in the SAME CORRIDOR space, is part of the “CRITICAL THINKING”

The Lane Cove to White Bay to Hawthorn Canal area that needs “CRITICAL THINKING” and “Innovation” to overcome the LACK of a National Park nearby for the Bio-diversity Route .

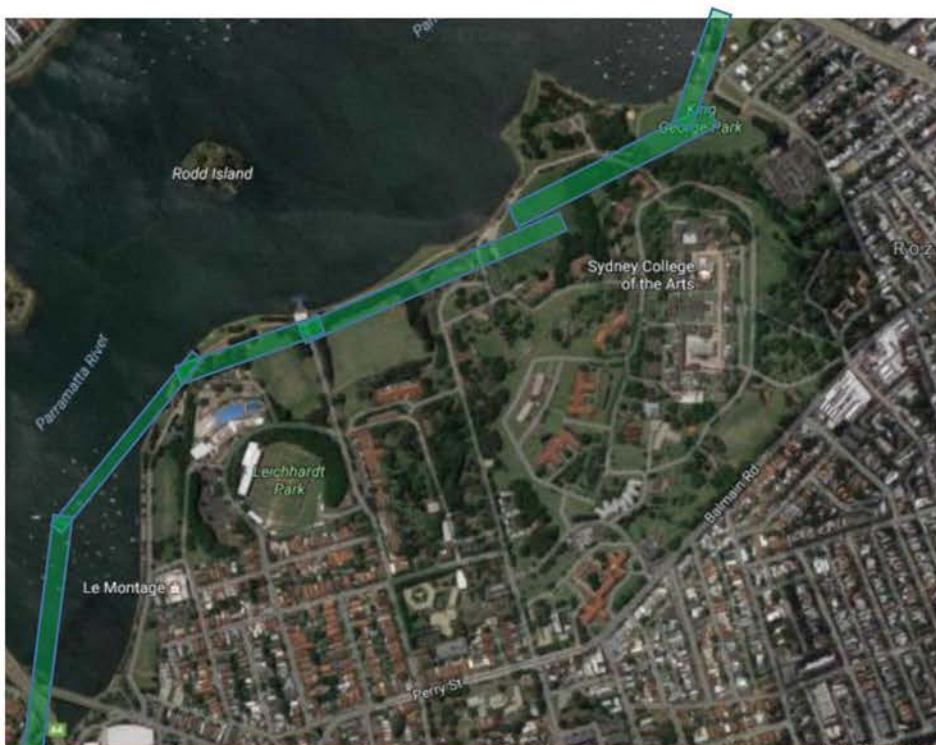
***A tunnel for the North West Rail line runs under Lane Cove National Park, and a TUNNEL runs under Lane Cove National Park for the Regional Toll Road . So going from a URBAN AREA to an URBAN AREA is OK, but intergrating the ROAD + RAIL infrastructure CORRIDOR seems “TO HARD”
? = why ???***





But linking the Lane Cove National Park to Royal National Park, with an above ground " Bio-diversity Corridor " requires " critical thinking ". The " Green Roof " solution is unlikely to be acceptable in the Lane Cove the Iron Cove Bridge region, so undergrounding the RMS road-way south of Gladesville Bridge is the " Next OPTION " .

South of Iron Cove Bridge putting the TOLL ROAD (WEST CONNEX in a tunnel to White Bay is already proposed in the WEST CONNEX project. So this allows the Victoria Road Corridor to become a "Vegetated GREEN STREET " perhaps a bio-diversity corridor with exclusion fence at the sides, with Walking and Bicycle Pathways at the Sides of the Street.



THE " THRU CALLAN PARK " Bio-diversity Corridor may be impractical so the ALTERNATIVE using the " GREEN ROOF " over the City West Link Road is suggested. Finding alternative Space for Sports Fields is Regionally Important.

Due to "complications in the Land-use at Callan Park , including Sports Fields in Callan Park " the ability to use Callan Park as a Bio-diversity Corridor is " not assumed possible " but it is in the Masterplan for Callan Park.

The Rozelle Goods Yard area is proposed to be assessed in detail for SPORTS FIELDS to be " re-located from Callan Park, including the " Cricket Field Proposal " on the large Sports Field space east of Wharf Road, Callan Park. There is SPACE for an Olympic Standard SKATE PARK to be built " above the Lilyfield Light Rail Service Depot " between Lilyfield Road and City West Link Roadway.



- *Imagine Sports Fields from Balmain Road to Victoria Road ? between Lilyfield Road and City West Link Road. ?? Could Smaller Court Sports be played below the MAIN GROUNDS at Street Level*
- *ALTERNATIVE REGIONAL Bio-Diversity Corridor becomes a " GREEN ROOF " above the City West Link Road from Victoria Road to Hawthorn Canal*
- *(Linking up with the Inner West Light Rail Corridor to Dulwich Hill) .*
- *It then travels thru Marrickville Golf Course and over Cooks River.*
- *To Wolli Creek Bushland Area.*
- *It then uses a " GREEN ROOF " vegetated Bio-Diversity Corridor over the " M5 West " RMS Corridor. This avoids the Option to use " Demolition of Housing and Factories to create the Biodiversity Corridor.*
- *The option to Demolish Housing is avoided in the Iron Cove to Dulwich Hill area by using a " Green Roof " with Native Plants to feed the Fauna, with a width of 30 m wide if possible.*
- *In addition a " ELEVATED RAIL LINE " is proposed to be constructed above the Green Roof (Bio-diversity Corridor)*
- *LINKING THE M4 EAST to the M5 West via the existing RMS road network is proposed.*
- *To avoid the cost of the M4 to M5 Linking Tunnel an UPGRADE of the Alternative was proposed*
- *Linking the M5 West to ASHFIELD AREA, by a Surface Road " Uplift " or Tunnel is the regional option to the M4 to M5 linking Tunnel.*

Clover Moore, Lord Mayor of Sydney City.

Clover Moore in her own "alternative to West Connex" suggests a upgrade of the King Georges Road

"We need to rethink the need, shape and scale of WestConnex and consider what could be done that is better economically for NSW," the council's report says.

*One of those flaws is that, though the initial justification for WestConnex was to improve the ability for cars and trucks to access Sydney Airport and Port Botany, the motorway as planned runs about **eight kilometres from the port**, and a mooted connection remains at least six years and extra billions of dollars away. **The council, therefore, proposes halting work on the current duplication of the M5 East.***

This would allow a proposed motorway interchange at St Peters, on the site of a former dump that has been remediated by the Sydney Motorway Corporation, to be used for housing. The City of Sydney council says about 13,000 dwellings could be built on the site.

Instead of duplicating the M5 East, the City of Sydney suggests introducing a toll on that road for the first time, which might reduce traffic by about 20 per cent, and removing the extra fees charged for catching the train to and from Sydney Airport.

To "soften" the impact of the toll, the council suggests compensating M5 motorists who have registered for cash back with a free Opal card for a year.

The council suggests scrapping the M4-M5 link from St Peters to Rozelle, a section of motorway the state government SAYS IS THE MOST IMPORTANT ELEMENT OF WestConnex.

The WestConnex interchange site at St Peters would be sold for housing, train fares to Sydney Airport slashed, and work on a new rail line between central Sydney and Parramatta accelerated under the City of Sydney council's alternative to the \$16.8 billion motorway.

The council's proposal also involves a significant upgrade to King Georges Road to substitute for the WestConnex tunnel under the inner west, and potentially smaller road tunnels linking Sydney's existing motorway network direct to Sydney Airport and the Cross City Tunnel.

The BLUE MOUNTAINS residents

They mentioned the increasing FREIGHT from Western NSW going over the Blue Mountains, to Port Botany and the ability of Neither the ROAD or RAIL service to cope west of Katoomba. The Electric train Line ends soon after Katoomba, and does Orange / Bathurst area. So a FASTER TRAIN Line to Orange / Bathurst may be good for Freight and Commuter Transport.

If this was in Europe, an EU Parliament could have granted funds to build a "key route" infrastructure project. This has happened with the Munich to Milan Euro-Rail FAST TRAIN

that has a tunnel at the Base of the SWISS ALPS with train speed of 250 kph for Freight and 350 hph for Passenger Travel.

So these people may be grateful if the Blue Mountains area got an “ Uplift in RAIL or ROAD infrastructure “ with the potential abandonment of the M5 to M4 Link Tunnel (stage 3) .

CENTRAL COAST residents

There is Some support in the Orange area, for a faster train to the “ Big City “ or a Low Carbon Plane Ride.

A similar outcome may be supported by Hunter Regional Development Authority who have a long-term Aim of a FAST TRAIN line between Newcastle and Sydney. A Bridge from Sydney to the Central Coast could cost “billions“ and increase the Freight Line capacity by using the “ existing Rail Corridor “ for FREIGHT more over the Whole Day. If it was a tunnel infrastructure project it could be a long tunnel just like the M4 to M5 Tunnel Link, but the purpose vastly different focussing on Rail Passenger Capacity and Freight Rail capacity between Newcastle and Sydney.

APPENDIX 1 ::

LETTER TO NSW TRANSPORT MINISTER Autumn 2017

To :: Andrew Constance MP, Minister for Transport

Office@Constance.Minister.NSW.gov.au

Re :: **Alternative Train Route to the Proposed SYDENAM TO BANKSTOWN METRO TRAIN LINE
= St Peter's to Liverpool via the M5 West.**

The attached file provides reference to the GREEN ROOF bio-diversity corridor running from Lane Cove National Park to Royal National Park, and then how it extends east at Wolli Creek Bushland to Sydney Park, St Peters. This is where the GREEN ROOF idea evolved, without a regional bushland corridor like Lane Cove National Park in the Regional Area.

The TRANSPORT COMPONENT is added later. The overall funding for " GREEN INFRASTRUCTURE " is flawed, but a large scale Urban Uplift proposal can provide funds ? when 35,000 plus dwellings are proposed in the Sydenham to Bankstown area (or alternative solution) .

So as the SYDNEY METRO proposal spread from North-West to South-West and includes " Urban Growth along the route" then the GREEN INFRASTRUCTURE " value capture ? " solution potentially covers the same area.

I have listened to a retired RAIL ENGINEER talk about the South West Train line, and the lack of RAIL CORRIDOR WIDTH in the Sydenham to Bankstown area. Because building an extra line would be " more sensible " than providing LESS CAPACITY than currently available was his solution.

So I suggest an ELEVATED RAIL LINE built over the M5 West Corridor.

The existing TRAIN LINE is retained, and the additional capacity created between St Peter's Station and Liverpool.

The TRAIN can be ELEVATED over the M5 WEST and also between St Peter's Station and Wolli Creek area.

The option is available to have an " express route to Liverpool, so the overall travel time from Cecil Hills to CBD is reduced to 60 mins or less (instead of current 1.5 hours, source = Train Commuter).

So if the TRAIN TRIP was faster the " Demand " for the M5 East Tunnel for cars may decrease ?

The Federal Govt is advocating the " 30 minute city " concept so a 30 min trip from Liverpool to CBD may be an achievable target, with a faster train.

It was late last year travelling to Katoomba that I discussed Train Trip times with a group of Europeans, who were with the German ICE TRAINS. Those trains travel at 250 kph or 350 kph so the Germans were saying they should be in Blue Mountains when they were only near Mount Druitt.

The " slower driverless train solution " is not universally accepted as " best option " . There is a Vancouver Driverless Train, but its critics say a Light Rail Solution is cheaper to operate.

So linking the St Peter's to Liverpool route to the City of Sydney " wish list " Stations of East Green Square, Ultimo, Pyrmont, and White Bay is a future option.

When this is investigated further, and the Willoughby Council General Manager's comments about a future Northern Beaches TRAIN LINE from Chatswood Area (in Rail Air-Space Inquiry) are considered (perhaps in long-term)

The Northern Beaches MP, Jason Falinski MP has already advocated for a TRAIN to NORTHERN BEACHES in 2016.

DOES the NORTH WEST RAIL LINE need an alternative route from Epping / Ryde to White Bay /CBD to allow capacity for the Northern Beaches Route to operate thru Sydney Harbour Bridge (or Harbour tunnel option ?)

So this is anticipated to be Victoria Road Corridor using a range of options to select the better option. This includes ELEVATED TRAIN LINE (or tunnel ?) , Subway Light Rail, Surface Light Rail ? and noise emission considered in the analysis of rolling stock, as the evidence shows the Light Rail is quiet above ground, and it has rubber clad steel wheels.

The above ground solution can be visually enhanced with vegetation to ' blend into the landscape'

The RAIL LINE between Carlingford/ Epping/ Ryde area and Parramatta can then be “reviewed “or UPGRADED from a Light Rail Line to an ELEVATED LINE with a GREEN SPACE below (Linear Landscape for Humans ?) or should it be “ Green Space for Bio-diversity ? “ (Tunnel is an Option ?).

This TRAIN ROUTE may be “ lower cost “ than a tunnel solution based on Vancouver advice for Sky-Train in Vancouver, and in NORTH PARRAMATTA use a “ VIA DUCT design like in the GLEBE area for the Light Rail to pass over Jubilee Park”, or place the TRAIN in TUNNEL in Parramatta and North Parramatta due to UNESCO WORLD HERITAGE items being in the area.

To complete the “LOOP “ consider how a TRAIN (or new TRAIN LINE ?) is constructed between Liverpool and Parramatta CBD with one option being ELEVATED with a Linear Park below.

The proposed WEST METRO is not fully supported by Balmain MP Jamie Parker who prefers an all-stops Train along Parramatta Road. So to accommodate that idea, a 27,000 capacity (or 40,000 capacity SUBWAY LIGHT RAIL) is proposed between WHITE BAY and Parramatta CBD. Thus it can operate both all-stops and EXPRESS SERVICES. Part of the 40,000 capacity each way per hour can consider the M4 West Corridor West of Strathfield, to avoid Tunnel construction costs). In busy China Cities the Light Rail is in Subways.

In Seattle, USA the Light Rail is 80 % elevated or in subway.

South-West Train Services may need “ review” as a comment outside Customs House spoke of the benefits of a faster train to Southern Highlands area. This seems to echo a “ Terrigal Vision “ for a 30 minute trip to Sydney CBD, by Train (or is it Fast Ferry ?) .

APPENDIX 2 ::

2 Rozelle Against West Connex Group – They have a list of “ issues” including the EXHAUST STACK design and filtration standards.

The overall “ Interchange Tunnel “ network under Balmain/Rozelle has prompted even the “ conservative “ Balmain Shores “ residents Group to put in a submission

The “ alternative “ is to use a MORE EFFICIENT transport system to deal with an expected population increase of 80%, and so this suggests “ MASS TRANSIT” an Driverless Cars and Trucks are part of the Answer. Mass Transit moving 40,000 in one lane is more space efficient than a Car with one passenger. This is the “ Peak Time “ problem of Traffic Congestion. So increasing the “ MASS TRANSIT “ solution for PEAK TIME may reduce the DEMAND. This is achieved by a consumption TOLL on entering the GREATER CBD AREA.

3 In the Rozelle Area the MOTORWAY TUNNEL solution may have HEALTH PROBLEMS due to LACK of SPACE to re-locate SPORTS FIELDS outside of CALLAN PARK to Rozelle Goods Yard area. The GROUP SPORT DEMAND including Cricket, Football (Soccer), Tennis, Basketball and Netball, Baseball, Skateboarding and Skateboard Slalom Runs, and Half-

pipes. This could be all the existing Sports Played in Callan Park, plus Skateboarding and In-line Skating

- 4 So the "filtration" solution needs to "solve the active sport field" use of Ground Level space, The Sports Fields can be built over the Light Rail Depot at Lilyfield and other Rail uses, and Industrail Land use like a Timber Yard.*
- 5 The "air quality" for native Fauna may also be important, but likely ignored by the EIS documentation.*
- 6 In Europe, and in China is Networks of FAST TRAINS designed to allow Fast Travel between Centres without using "Polluting Planes" to achieve the movement. This option is just a "Dream" in Australia.*

John Bradfield the Engineer who designed the Sydney Harbour Bridge, also designed an Electric Train Network for the whole of Metro Sydney Area, so the Steam Train Smoke was a "Thing of the Past". Now the "Coal-fired" power stations are pollution sources to be converted to renewable power supply. Battery-Electric bicycles, battery electric cars (TESLA and BMW) are being produced commercially in 2017.

So with Sydney Growing Out, the Network of RAIL may need to "GROW OUT" also with FASTER TRAINS to "outer suburbs" ?? instead of a FOCUS on ROAD TUNNELS in the INNER CITY area to move FREIGHT because the PORT of SYDNEY was re-located to PORT BOTANY without Solving the FREIGHT TRANSPORT SOLUTION with RAIL SOLUTIONS of adequate capacity.

The Battery Powered devices "transition" may open-up a variety of Transport Solutions that do not need "roads" just tracks over grasslands below. (and this is a "design element" in FUTURE STREETS exhibition outside of Customs House, Circular Quay, Oct 2017. SEATTLE has 80 % of its LIGHT RAIL NETWORK elevated or in Subway. So reducing PEAK DEMAND for car lane capacity, may be a solution for Military Road Mosman ??

APPENDIX 3 ::

JUNE 5 2017

SAVE

Clover Moore reveals City of Sydney's radical proposal to overhaul WestConnex



Jacob Saulwick

The WestConnex interchange site at St Peters would be sold for housing, train fares to Sydney Airport slashed, and work on a new rail line between central Sydney and Parramatta accelerated under the City of Sydney council's alternative to the \$16.8 billion motorway.

The council's proposal also involves a significant upgrade to King Georges Road to substitute for the WestConnex tunnel under the inner west, and potentially smaller road tunnels linking Sydney's existing motorway network direct to Sydney Airport and the Cross City Tunnel.



Clover Moore is pushing the proposal to highlight what she sees as significant flaws with WestConnex. Photo: James Brickwood

With the Gladys Berejiklian government seemingly wedded to its plans for WestConnex, the council's alternative proposal is unlikely to amount to more than an academic exercise.

But lord mayor Clover Moore is nevertheless pushing the proposal in part to highlight what the council sees as significant flaws in the government's fast-growing motorway vision for Sydney



NSW Premier Gladys Berejiklian has dismissed the plan from the City of Sydney. Photo: Nick Moir

"We need to rethink the need, shape and scale of WestConnex and consider what could be done that is better economically for NSW," the council's report says.

One of those flaws is that, though the initial justification for WestConnex was to improve the ability for cars and trucks to access Sydney Airport and Port Botany, the motorway as planned runs about

eight kilometres from the port, and a mooted connection remains at least six years and extra billions of dollars away.

The council, therefore, proposes halting work on the current duplication of the M5 East.

This would allow a proposed motorway interchange at St Peters, on the site of a former dump that has been remediated by the Sydney Motorway Corporation, to be used for housing. The City of Sydney council says about 13,000 dwellings could be built on the site.

Instead of duplicating the M5 East, the City of Sydney suggests introducing a toll on that road for the first time, which might reduce traffic by about 20 per cent, and removing the extra fees charged for catching the train to and from Sydney Airport.

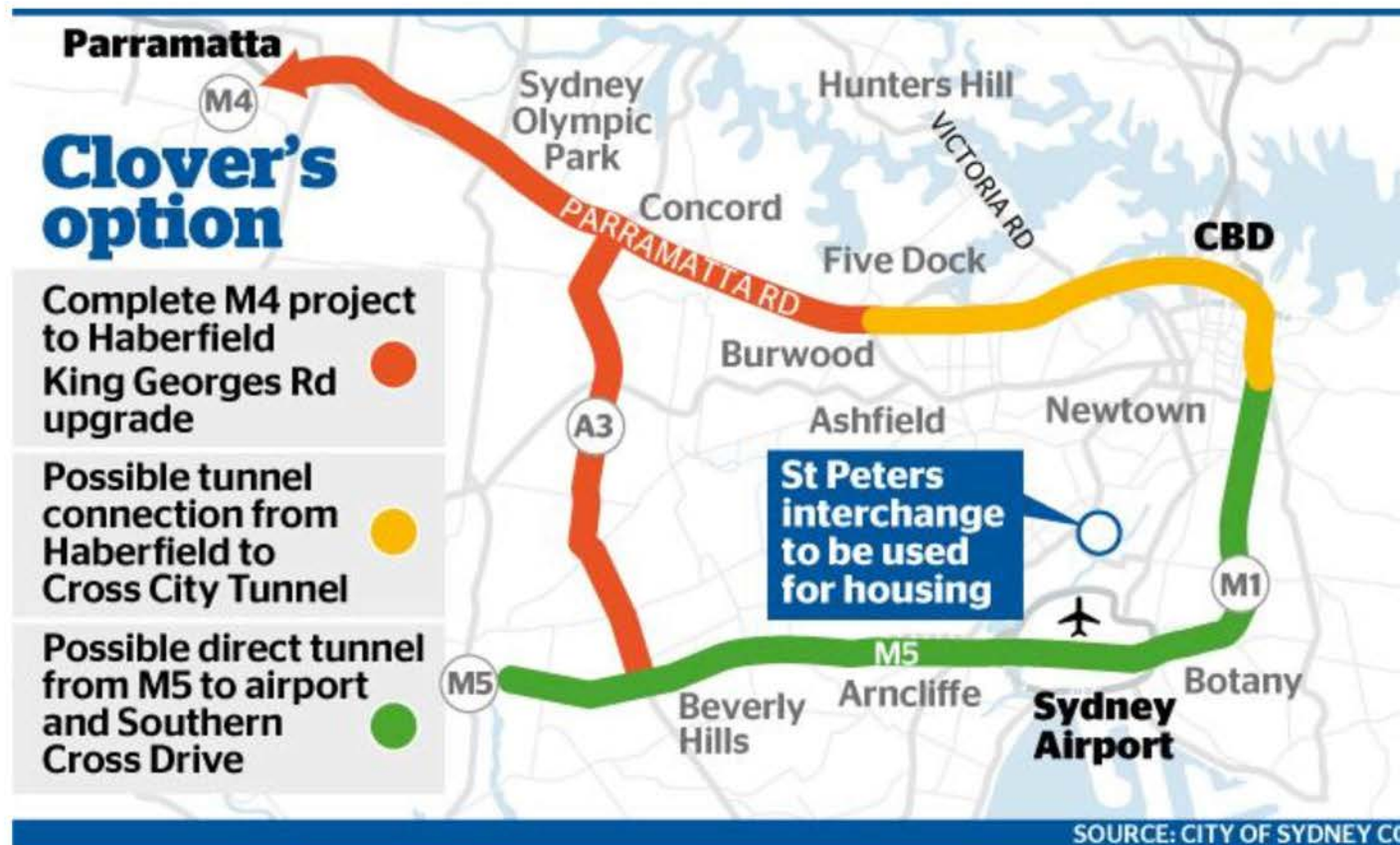
To "soften" the impact of the toll, the council suggests compensating M5 motorists who have registered for cash back with a free Opal card for a year.

The council also says is the most important element of suggests scrapping the M4-M5 link from St Peters to Rozelle, a section of motorway the state government WestConnex.

Instead, the council proposes a series of upgrades to King Georges Road. King Georges Road, which Infrastructure Australia has said is the [second-worst road corridor in the country](#), would constitute an alternative north-south route across inner-western Sydney suburbs.

The council's alternative vision does include a few motorways. It accepts the extension of the M4 motorway to Haberfield. But it says any further extension of that road should be delayed until a new metro rail link is built between central Sydney and Parramatta. If needed, the M4 could be extended in a smaller tunnel to connect to the under-utilised Cross City Tunnel.

And the council is also open another M5 East tunnel – but a smaller tunnel that connects from the M5 directly to Port Botany and Southern Cross Drive. The plans, however, will almost certainly fall on deaf ears.



"Our concern is that the costs for this project are spiralling out of control and they will continue to do so," Cr Moore wrote to Premier Gladys Berejiklian in April, while also briefing her on the council's alternative.

The council has tallied the road projects planned to be added to WestConnex at \$45 billion.

Ms Berejiklian replied that her government's experts estimated the council's plan would cost potentially double the amount of the \$7 billion M4-M5 Link and airport and port connection. The council disputes Ms Berejiklian's analysis.

Asked on Monday if she would consider an alternative route for WestConnex, Ms Berejiklian said: "I respect people have strong opinions on this project but the City of Sydney does not represent greater western Sydney where the public will benefit from this massive road project."

The council, however, will continue to oppose the project.

"Other global cities have stopped pursuing motorway projects of the magnitude and cost of WestConnex," it says.

FUTURE STREETS

Applying the "Driverless Bus" technology to a Congested Military Road in Peak Morning Travel, we get a 2,000 per car movement, over 4 lanes in the morning, to compress into much less lane width, but only if the one passenger per vehicle "standard on 2017" is "transformed ????" into 6 passengers seated bus travel (per former car space with one person each car) perhaps 12 per Driverless Bus (if standing passengers included) . So this "transformation ????" produces a Capacity increase of 6* times or 12* times the current capacity. This needs more attention to "Detail Social Studies" to see how it can be achieved, instead of building a "BEACHES TUNNEL" project for "faster Car travel?". $2000 * 6 = 12,000$ people per hour or 24,000 using standing people in Driverless bus. Then there is the "LIGHT RAIL OPTION" that can deliver 27,000 per hour in just 2 lanes in same direction. The Electric Bicycle may be the "FUTURE STREET" solution for travel between Home or Office and the TRAIN STATION, if Local Busses are too infrequent, and Volunteer Drivers unavailable.

So applying the "Future Street" technology to the West Connex Road Tunnel Network may provide a different "demand map" for the West Connex project ?? Then add the option of increased Public Transport on Victoria Road and M5 West (with an elevated Train Line Concept on both ROADWAYS the "demand map" for WEST CONNEX may decrease at "PEAK TRAVEL" periods.

The "Smart Metering" devices used for Electricity Supply demand "Tracking + Supply Levelling" could be "adapted to Car Use" data mapping ".

ALTERNATIVE TRANSPORT INFRASTRUCTURE

CLOVER MOORE , LORD MAYOR OF CITY OF SYDNEY

3 April 2017

LETTER FROM CLOVER MOORE. MAYOR OF SYDNEY.

TO :: NAME WITHHELD

Alternative Transport Infrastructure

I refer to your letter suggesting alternative transport infrastructure for Sydney, and thank you for sharing your research. I'm sorry for the delay in responding.

I agree a public transport alternative to WestConnex is very desirable, and your proposed rail line linking central Sydney, the inner west, and Liverpool and Campbelltown in M5 West airspace is one example of such an alternative. Major cities around the world are making public transport their priority, not toll roads, and Sydney needs to do the same.

WestConnex provides a 1950s response that doesn't match our 21st century transport needs. It has been recognised there is a fundamental problem with trying to ease congestion by increasing road capacity – the extra demand eventually negates any initial benefit. A more effective solution

would be to improve public transport so that more people use it instead of driving, and leave more space on the roads for people who need to drive.

The City continues to advocate for public transport investment across the Sydney metropolitan area as an alternative to road investment that benefits private vehicles.

Regarding your proposed biodiversity corridor that would include a cycleway, the City is already investing in increasing the cycling network and the open space across our local government area. We're working to make cycling a safe and popular transport choice by creating a network of safe and connected bike paths that take people where they need to go. We have now completed 12.5km of safe, separated cycleways and have several more projects under way.

We're also working with neighbouring councils on the Inner Sydney Regional Bike Network – 10 regional routes to improve connections between popular destinations including the city centre, universities, parks and recreational facilities, and employment locations. The routes are a combination

of existing on-road bike lanes, paths shared with pedestrians and, where possible, separated cycleways. Council adopted our Open Spaces Sport and Recreation Needs Study in December 2016, which gives directions on increasing linked open spaces through site acquisition, dedication of land from large development sites, and advocating for after-hours sharing of public space such as in school grounds.

Our six-monthly bike counts at 100 intersections throughout our local government area show bike trips have doubled in the City since we started building cycleways six years ago. More than 7000 people now ride to work in the city centre each day – the equivalent of 116 full buses or seven Sydney trains.

Particularly in the city centre, the City is working hard to reduce traffic overall and make conditions more attractive for people walking and cycling. Walking accounts for 92% of trips in the city centre and we're doing extensive work to make it easier to walk around our city. In 2015, Council adopted the City of Sydney Walking Strategy and Action Plan. This aims to make walking quick, convenient, easy, inviting, safe and interesting – it includes targets to improve pedestrian safety and reduce delay in walking times, particularly at intersections. You can read the strategy at bit.ly/1cQFKMd. We're also

working with the NSW Government to implement pedestrian improvements throughout the city centre.

Regarding your 'Greenway' proposal along the Inner West Light Rail corridor, the City would support the concept, but the land included is mostly outside the City of Sydney local government area. You may wish to contact the Inner West Council about this proposal at council@innerwest.nsw.gov.au.

In fact all your proposals, while similar in concept to actions the City is already taking, are on a metropolitan scale and so the NSW Government is, as you noted, the appropriate level of government

to consider them. The City's priorities generally have to focus on what we can achieve at a local government level, and while we might support any proposals you advocate to the government, we're already committed to the City's own actions and investments in alternative transport infrastructure.

If you would like to speak with a Council officer about the City's transport priorities, you can contact Bryony Cooper, Executive Manager – City Access and Transport, on 9265 9333 or at bcooper@cityofsydney.nsw.gov.au.

Yours sincerely

Clover Moore

Lord Mayor of Sydney

**LANE COVE NATIONAL PARK to ROYAL NATIONAL PARK
(future World Heritage Item)**

1. Linking Lane Cove National Park to Callan Park is achieved by assessing the *FUTURE CITY* Mass Transit solutions and Toll Road options, on Victoria Road, instead of just “ undergrounding the RMS corridor “ to create the *GREEN GRID* at Street Level , or building an *ELEVATED GREEN ROOF* ?
2. A *TUNNEL* up to *IRON COVE BRIDGE* Victoria Road is already within the *WEST CONNEX*, so what infrastructure solution can deliver a *GREEN GRID* in the area between Callan Park and Lane Cove National Park, and be” visually acceptable ??”.
3. But a there is opposition across the *WEST CONNEX* area to the project, then looking at *TRAIN SOLUTIONS* seems “ resilient “.
4. Would an *ELEVATED* (or tunnel?) *TRAIN* running along Victoria Road be an acceptable alternative, if it was in tunnel south of *IRON COVE BRIDGE* ? There is an elevated *TRAIN LINE* operating thru Woolloomooloo for years.
5. Imagine conceptually a *TRAIN* extending to Northern Beaches from Chatswood area,) as hinted by Nick Tobin, General Manager, Willoughby Council in 2011) we find potential *CONGESTION* in the Train Network at Chatswood Station so the Northern Beaches Route *TAKES* the existing proposed Harbour Tunnel or Second Harbour Bridge crossing ?? This train may be possible, if the West Connex South was abandoned ?
6. Running an Elevated Train between Ryde/ Epping and Parramatta is an Option to consider if it can help fund a *GREEN GRID* –linear park for humans along the same route, perhaps just 2 car lanes wide ?.
7. Linking the *GREAT NORTH WALK* back to *IRON COVE* is an option to consider. Once at Callan Park it is easy to extend the walk to Sydney CBD, and The Rocks area (in a 10 km walk) .
8. The Concept initially is to have the *ROAD TRAFFIC* solution (undergrounded south of Gladesville Bridge) combined with an Elevated *TRAIN LINE* to create a ground level “ vegetated bio-diversity Corridor up to 6 car lanes wide, between Lane Cove National Park and Callan Park (or its alternative route to the (revised Inner West Greenway) .
9. Both the *RMS* roadway and *TRAIN* can be in *TUNNEL* south of Iron Cove Bridge to White Bay Precinct.
10. So it’s a technical challenge to create a *GREEN ROOF* bio-diversity corridor between Callan Park and Lane Cove National Park. The alternative is to use a Night Fauna Ferry between Callan Park and Lane Cove National Park.

CALLAN PARK

11. The Local Council has a MASTERPLAN (approved by Council) that includes a Bio-diversity Corridor East-West thru that (needs a reality check) as the likely space is now sports fields, so re-locating the Sports Fields is a serious option, to Rozelle Goods Yard
12. The alternative is to build a GREEN ROOF over the CITY –WEST road to IRON COVE BRIDGE. Callan Park is Heritage listed and purchased by “ Father of federation “ Sir Henry Parkes, for the NSW GOVERNMENT.
13. The Callan Park long-term use is now in doubt as Sydney College of Arts may leave in 2018 ? And the Ambulance Headquarters could leave within 5 years. So a Future without Sports Fields, but a REGIONALLY SIGNIFICANT wildlife Corridor could be created, and Add Heritage Farmlands , and Heritage Pleasure Gardens and Heritage Lawn Bowls and Tennis Courts, a Writers Centre, and potential Hotel School (within the Ambulance Headquarters Precinct (refer to MHCC and ALAN ROSEN conference in the last 5 years). A HOTEL (or Youth Hostel ?) could be staffed by disabled staff, using the Trieste Model in Italy. If the Sports Fields are re-located there is space for Lavender Fields to attract butterflies, Scented Gardens, Medicinal Herb and Plant Gardens, Fruit Trees / Orchard Space, Grape vines on the “fence lines “ (as at Vacluse House), a CAFÉ in the Grounds, and Sculpture in the grounds. There is small farms to as inspiration in USA.

INNER WEST GREENWAY

14. INNER WEST GREENWAY (revised) uses a GREEN ROOF over the existing Light Rail Line (and future space for extra future TRACK) rather than “ blocking expansion by running the “ GREENWAY PATHWAY “ at similar level as LIGHT RAIL, creating a Discontinuous Bushland Corridor.
15. Clearly, the original design was defective as a Bio-diversity Corridor .
16. The Revised Version with GREEN ROOF can be 10 m wide minimum “ bushland/ shrub-land “) . The area of the Corridor that is WIDER can be vegetated in normal earth way, with the GREEN ROOF over the LIGHT RAIL operation area.
17. This LINKS Lane Cove National Park to Wolli Creek Bushland Area. This concept is an extension of the Wolli Creek Preservation Society vision of over 20 years ago to have a bushland corridor extend to Iron Cove from Wolli Creek.

South of DULWICH HILL STATION to COOKS RIVER

18. The area south of DULWICH HILL Station, includes Marrickville Golf Course. So a “detail solution “ is needed to avoid conflict between the GOLF + wildlife movement . It not just a Bird Corridor.
19. Crossing the Cooks River, may need a “ FAUNA BRIDGE “.
20. If the Cooks River water is Clean then consider a Platypus Recovery Plan for the River, extending to Wolli Creek Bushland.

WOLLI CREEK BUSHLAND

21. Then its “ over the water/ Cooks River by Fauna Bridge “ and then to WOLLI CREEK bushland area.

M5 WEST “GREEN ROOF “

22. M5 West “ GREEN ROOF “ over the RMS road-way.

23. Refer to the maps.

24. This goes from Wolli Creek to Liverpool

25. This connects to Georges River Catchment area, and allow travel to Royal National Park thru bushland areas.

From: [REDACTED]
Sent: Mon, 16 Oct 2017 02:05:49 +0000
To: [REDACTED]
Subject: FW: Submission Details for Mathew Smith (object)
Attachments: 228044_WESTCONNEX_STAGE 3 EIS_OBJECTION_ from 7 Toelle St
 Rozelle_2017Oct16_1253.pdf

From: system@acelo.com On Behalf Of Mathew Smith
Sent: Monday, 16 October 2017 12:55:11 PM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for Mathew Smith (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Mathew Smith
[REDACTED]

Address:
[REDACTED]

Rozelle, NSW
2039

Content:

To those that currently frequent the stretch of Victoria Road between the Iron Cove and Anzac Bridges the 1 km Rozelle Interchange is a misguided solution to ease traffic on one of Sydney's most congested roads.

We plead for for review of this component of the project ensuring an independent and detailed Cost-Benefit Analysis is performed.

Please find the attached Submission for your review and records.

[REDACTED]
 Submission: Online Submission from Mathew Smith (object)
https://majorprojects.acelo.com/?action=view_activity&id=228044

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

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

The Honorable Anthony Roberts.
Minister for Planning
GPO Box 5341,
SYDNEY NSW 2001

The Director Transport Assessments
Planning Services, Department of Planning and Environment
GPO Box 39, SYDNEY, NSW 2001.

CC - The Premier of NSW,
WestConnex project Team, Roads and Traffic minister, Politicians, Traffic Consultants.

SUBMISSION: OPPOSING - STAGE 3 EIS, WESTCONNEX M4-M5 LINK & ROZELLE INTERCHANGE

16 October 2017

Dear Minister

We Strongly oppose the Stage 3 EIS, WestConnex M4-M5 proposal because of the following points:

- **MISGUIDED SOLUTION:** To those that currently frequent the stretch of Victoria Road between the Iron Cove and Anzac Bridges the 1 km Rozelle Interchange is a misguided solution to ease traffic on one of Sydney's most congested roads. Clearly, vehicle congestion will be increased on the stretch of road between the Iron Cove and Gladesville bridges that is already a bottleneck during peak hour times. The solution, including the location of the access/egress points has a misguided intent and serious consideration should be made in regards to the Cost-Benefit Analysis of this component of the project.
- **TRAFFIC CONGESTION:** The proposal will bring even more traffic chaos and congestion to Rozelle. We believe the convergence of traffic into the area from the M4, M5, CBD and the proposed new harbor tunnel will cause Victoria Road, Anzac Bridge and the City West Link to become even more grid-locked.
- **SEVERE AIR POLLUTION & HEALTH RISKS:** We're totally opposed to the unfiltered exhaust stacks proposed for each end of Rozelle. Significant pollution over Rozelle from these and additional vehicle emissions pose a significantly serious health risk to all in our community, especially the young children from nearby local schools and pre-schools.
- **LONG-TERM NOISE POLLUTION:** In the event of tunnel & road construction, the impact from noise, dust, vibration and long-term construction times will cause severe disruption and inconvenience to residents and local businesses, in some cases, a loss of revenue. Traffic usage of the proposed tunnels beneath our homes will inevitably cause permanent environmental vibration and noise. If so, the residents need to be adequately compensated.
- **ERODING THE ROZELLE VILLAGE COMMUNITY:** This Stage 3 EIS proposal will further degrade a unique inner-city Sydney suburb. Rozelle is renowned for its heritage 1800's/1900's cottage culture and village-like community. Walking to the parks, markets, shops, schools, sporting venues and pubs are the reason people choose to live here. The Stage 3 EIS proposal will geographically divide the suburb even more, giving traffic more precedence than the actual residents.

As Minister, it is your duty to ensure effective decision are made for all residents and hence we ask you to directly oppose the Stage 3 EIS WestConnex M4-M5 proposals and to instead think to the future by implementing the design and construction of a world-class metro and public transport system throughout Sydney.

Yours sincerely,

Mathew, Amanda and Poppy Smith
7 Toelle Street,
Rozelle NSW 2039

From: [REDACTED]
Sent: Mon, 16 Oct 2017 02:17:16 +0000
To: [REDACTED]
Subject: FW: Submission Details for company Coalition Against WestConnex (org_object)
Attachments: 228056_CAW M4-M5 Link SSI 16_7485 EIS Submission_2017Oct16_1311.pdf

From: system@acelo.com On Behalf Of Coalition Against WestConnex Company
Sent: Monday, 16 October 2017 1:12:14 PM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for company Coalition Against WestConnex (org_object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Coalition Against WestConnex Company
 Organisation: Coalition Against WestConnex (Member)
 Govt. Agency: No

Address:

St Peters, NSW
 2044

Content:

The official submission from the Coalition Against WestConnex (CAW) to the M4-M5 link, project number SSI 16_7485, Environmental Impact Statement is included as a PDF attachment below. See CAW M4-M5 Link SSI 16_7485 EIS Submission.

Submission: Online Submission from company Coalition Against WestConnex (org_object)
https://majorprojects.acelo.com/?action=view_activity&id=228056

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

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

Submission to WestConnex New M4/M5 EIS

Project number SSI 16_7485

COALITION AGAINST WESTCONNEX

Introduction

This is the official submission from the Coalition Against WestConnex (CAW) to the M4-M5 link, project number SSI 16_7485, Environmental Impact Statement. We object to this application.

The People's M4/M5 EIS is a project of the Coalition against WestConnex (CAW), a network of community groups opposed to WestConnex. It includes the following groups:

Camperdown Residents Against WestConnex (CRAW)
Leichhardt Against WestCONnex (LAW)
Newtown Residents Against WestConnex (NRAW)
No WestConnex Annandale
No WestCONnex: Public Transport (NoWPT)
Rozelle Against WestConnex (RAW)
Save Ashfield Park (SAP)
Save Newtown from WestConnex
Stop WestConnex - Glebe and Forest Lodge
WestCON Community Action Group Haberfield/Ashfield
WestCONnex Action Group (WAG)

The People's EIS endorses the submissions of its member organisations.

CAW opposes the WestConnex project in its entirety, including the M4-5 Link. Any statements in this submission which refer to amelioration of predicted impacts should not be interpreted as an endorsement of the WestConnex project.

This submission covers the following topics

- 1.0 General Submissions
- 2.0 Impacted Local Areas
- 3.0 Air Quality
- 4.0 Social and Economic Impacts
- 5.0 Consultation
- 6.0 Contamination
- 7.0 Flooding and Drainage
- 8.0 Green House Gas
- 9.0 Human health
- 10.0 Non Aboriginal Heritage
- 11.0 Soil and Water Quality

12.0 Traffic and Transport

1.0 General Submissions

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 address any local impacts created by the proposed M4-M5 Link. Rather it prepares the pathway for sale of the Sydney Motorways Corporation to the private sector. If this privatisation goes ahead, the new owners and its contracting companies will be handed responsibility for oversight and control of the final design, cost and implementation of the M4-M5 Link. This is a frightening prospect for residents who have already experienced or observed others undergoing the terrible impacts of the Stages 1 and 2.

The EIS repeatedly 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.' 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. This entire process is a sham. If it is approved, no one will know to what extent their concerns will be taken into account as the contractor can simply submit further changes. The contractor would not be bound to take into account community feedback. Given that the contractor will be trying to deliver the project as quickly and cheaply as possible, it is unlikely that the additional measures proposed in the EIS with respect to construction, noise mitigation, for example, would not be adopted.

The EIS should not be approved on the basis that it does not provide a reliable foundation on which to approve documents. Given that the designs are 'indicative' only and subject to change, they do 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. It is unclear how the Secretary's Environmental Assessment Report which has to be prepared under Section 115ZA of the EP&A ACT 1979 can have any legitimacy and accuracy given the situation. Because of this the EIS is riddled with caveats and lacks clear obligations and requirements for project delivery. The additional effect of this uncertainty is that the community and other stakeholders, such as the Council, will be unable to undertake monitor compliance as the conditions are simply too broad and lack any substantial detail.

As has been seen with the M4 East and New M5, general conditions nearly always allow discretion and in practice are of little use to residents who have confronting horrific noise at night that damages health. 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. While this could seem a small thing, it can lead to sleepless nights and severe anxiety.

Failure to meet stated strategic objectives

The Stage 3 EIS 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.

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.

Accountability handed to unknown private operator

We are completely opposed to privatisation 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.

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 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 health impacts of traffic congestion.

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-2031 conditions was not undertaken, however benefits were assumed to continue until 2052.
- the Business Case did not reflect global approaches to congestion management, such as transit investment and demand management.
- the Business Case suggested WestConnex would help renew Parramatta Road by reducing traffic on it, despite the modelling showing that many parts of it would carry more traffic, not less.

- travel time savings 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 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 account of many of the costs including:

- cost 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

The People's EIS considers that the NSW government is currently falsely holding the costs of WestConnex to \$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. 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.

Independent assessment is needed

The NSW government wants to turn the approval of the EIS into a foregone conclusion. The People's EIS asks 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.

Lack of transparency

Public consultation cannot be meaningful when so much is hidden from the public and so much is uncertain.

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.

Preferred Infrastructure Report must be published

The People's M4/M5 EIS understands that the Sydney Motorway Corporation is already preparing a report with its preferred construction options. This must be published and the public allowed a genuine opportunity to provide feedback on this report.

2.0 Impacted Local Areas

This section of the submission describes the reasons for objecting to the M4-5 Link on the basis of the detrimental and unmitigable socio-economic, environmental and health impacts it will have on different areas of Sydney.

Haberfield / Ashfield

CAW objects to planning application SSI 7485. This part of the 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).

CAW 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 five further years of the atrocious and often not predicted impacts of WestConnex.

As a result of this experience, CAW 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. However 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.

CAW specifically objects to Construction Options A and B in any possible combination

CAW objects 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 M4-5Link 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.

CAW objects to the notion, within the EIS, that there is any 'choice' in this matter given the indicative nature of Option A and B, lack of detailed construction design and work plans, as well as the indicative only nature of spoil truck routes.

Furthermore, the EIS states that the locations identified for the construction ancillary facilities criteria will be subject to particular criteria. Neither Option A or B meet this criteria, see comments.

The locations of key project infrastructure – where feasible, the construction ancillary facilities would be located within or adjacent to land which would be used for permanent operational infrastructure. **Comment:** Haberfield/Ashfield Option B acquires and alienates increased private land

Co-locating sites with other WestConnex projects where possible – the project would use construction ancillary facilities approved for use by the M4 East and New M5 projects at **Haberfield and St Peters respectively.**

Comment: Option B adds new land to the project footprint and also both Option A & B renege on previous promises and assurances given by SMC to minimise above ground impacts on local residents with the M4-5 project.

Land is suitable for use – this included consideration of surrounding land uses, biodiversity and heritage values and minimising disruption to communities.

Comment: Both Options A&B will significantly disrupt local communities

Accessibility – sites would be located close to arterial routes for spoil haulage and would minimise use of local roads through residential areas.

Comment: The promised option of no above ground construction sites in Haberfield/Ashfield permits use of tunnel exit portals and then underground tunnel movements for spoil haulage. So this option would impact significantly less on all residential areas in Haberfield/Ashfield.

Minimising private property acquisition – the aim is to utilise government owned properties where possible.

Comment: Option B involves more private land acquisition

Construction program implications – site selection that would enable construction works to be completed as efficiently as possible. **Comment:** Whilst there may be efficiencies for engineers with Options A & B or their more extensive preferred hybrid options, these efficiencies do not properly consider the impact of a decade long industrial project in the midst of a densely populated residential setting. The loss of productive efficiency of thousands of employees, businesses and school children impacted by these proposals is not adequately assessed nor quantified. It is noted that the EIS now proposes to minimise the impact of the project around the Darley St site, by limiting work to business hours. This courtesy and consideration should be extended across all project sites, due the extended time frame of the project. There should be a nighttime curfew, with no heavy truck movements nor project work after 10 pm.

Breach of Promise to residents

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. CAW objects that the M4-M5 project proposes to deny and renege on what was originally promised to the Haberfield and Ashfield community, which will now result in a total of 8 years, or more, of construction being imposed upon the residents and businesses.

‘Indicative’ nature of EIS is not acceptable

CAW objects to the whole ‘indicative’ nature tone of the EIS. SMC staff have admitted at information sessions that this is little more than a concept design. We specifically object to the lack of detailed construction site and work plans associated with any of the proposed Haberfield and Ashfield above ground sites.

Residents and Councils have repeatedly objected to the staged approach to the planning of WestConnex. This allows what seems to be settled proposals to become open ended and shift between stages. There is a 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. This exposes residents to up to eight years of construction impacts. This is either due to poor construction planning and management – or 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 all 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.

St Peters

CAW objects to the M4-5 Link tunnel EIS in its entirety and in particular for its horrific construction and operational impacts on the suburb of St Peters.

The author of this section of the EIS lives on Hutchinson Street, St Peters. It’s a small one-way street, entry from Campbell St.

Campbell St and Campbell Rd has lost all of its houses and other buildings to the re-alignment works to take traffic down to the St Peters Interchange, which is being built on an old toxic rubbish dump. Seeing neighbours’ homes demolished was wrenching and on top of that has been the noise, the dust and traffic and night work in case the daylight disruption wasn’t enough. 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.



Old heritage cottage that was demolished in 2017 to make way for the widened road onto which will pour traffic from WestConnex

St Peters Primary School is across Simpson Park in St Peters Street. There's a zebra crossing to the school's street the local parents use to walk their children to school, past the demolitions. We can only imagine what it has been like for children seeing the homes of their neighbours knocked down in front of them. But that is not the worst of the story of WestConnex for our neighbourhood.



Three ventilation stacks for St Peters

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) we now discover there will 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 would be "neatly" triangulated between the two sets of stacks which rise up above the Princes Highway. The prevailing winds in our neighbourhood are from the east, so the exhaust from the stacks will blow over the school whether the wind is coming from the

south or the north.



Traffic will be worse with Stage 3 – not better

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. (Read more about this in our Air Quality submission)

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.

That is why we are writing a submission to object to the latest Stage of this project. We cannot let the state government get away with this assault on our health and our children's, to create more traffic jams.

Leichardt

Darley Rd Construction site

We are 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.

Traffic

An important reason for objecting to the location of the Darley Road civil and construction site is 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 Leichardt 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 this 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.

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.**



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.

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. 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 balance construction against the protection of the environment, these assessments effectively rubber stamped destruction.

Noise

CAW objects 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.

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 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 they can 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 disputed the need for mitigation and residents have been exposed to horrific noise. This level of non accountability is not acceptable to me or my community. Standard conditions without detail or accountability are not acceptable to me.

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

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. Night work is objected to in the strongest terms.

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 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.

Installation of a permanent motorway operations complex

CAW objects 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.

Tunneling dangers to Leichhardt community

The estimated 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 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.** 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.

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 hope it is not), 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.

Lack of transparency and Improper handling of public moneys

Acquisition of Dan Murphys

CAW objects 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.

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, see Chikarovski helped lease owner in deal that complicates WestConnex by Jacob Saulwick, March 1, 2017 and The Mystery of the Bottleshop, WestConnex tunnel and the \$50 m. bill by Jacob Saulwick. SMH, May 14 2017. 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 while these may not be the responsibility of NSW Planning, if there are concerns, they should be referred to other agencies. See

Newtown

CAW objects 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 – here is a US article from 2013)

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.



Campaigning against WestConnex in Newtown

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.

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.

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. We need transport policy that reduces traffic congestion not encourages it.

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 learnt 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
- the steep grade slows down heavy vehicles which will contribute to congestion further adding to vehicle emissions as compared to free flowing traffic.

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%.

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

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 in crashes that will be caused by the additional 170 vehicles a day that are proposed to enter and leave Darley Road during the construction period.

Western Sydney

1. 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.

2. 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.

3. 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.

4. 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.

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, modeled 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.

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. CAW objects 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.

Annandale

It is clear, that Annandale will be exposed to unacceptable health risks. The Rozelle Interchange and its surrounds will experience a massive numbers of extra trucks, **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**. Children and the elderly are most at risk to lung ailments and the surrounds will also experience **increased traffic with its associated noise and air pollution**- in particular Crescent Street, Johnson St and Catherine St. These streets are already highly congested at peak times and with a **massive number of extra truck movements** and traffic associated with construction, these streets will become gridlocked during peak times. Annandale Public School, Annandale North Public School and Leichhardt Public School are in close proximity to these areas and there is concern around the impact it will have on their students. Additionally Lavery Pathology and St Basil's Sister Dorothea Village, a residential aged care facility, will also see the effects of the WestConnex project. We think this is not acceptable and do not trust the EIS's figures which claim that the PM levels in the area will reduce.

The removal of 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.

Annandale Public School corresponds to Community Receptor CR09 and St Basil's Sister Dorothea Village corresponds to Community Receptor CR21 in the EIS. It claims that the building of the M4-M5 link will actually reduce the PM10 levels and PM 2.5 levels, see table below. This needs to be explained to the community as it appears counter intuitive. The assumptions underlying these calculations need to be clearly state. Also, how do such future scenarios compare with a future scenario where no stages of the WestConnex project are built?

Table K-29 Annual mean PM₁₀ concentration at community receptors

Receptor	Annual mean PM ₁₀ concentration (µg/m ³)							Change relative to Do Minimum (µg/m ³)				Change relative to Do Minimum (%)			
	2015-BY	2023-DM	2023-DS	2023-DSC	2033-DM	2033-DS	2033-DSC	2023-DS	2023-DSC	2033-DS	2033-DSC	2023-DS	2023-DSC	2033-DS	2033-DSC
CR01	-	17.7	17.6	17.7	17.8	17.7	17.7	-0.1	0.0	0.0	-0.1	-0.8%	-0.3%	-0.2%	-0.4%
CR02	-	17.5	17.3	17.6	17.5	17.4	17.6	-0.1	0.1	-0.1	0.0	-0.8%	0.5%	-0.5%	0.2%
CR03	-	19.7	18.9	18.8	19.5	18.7	18.9	-0.8	-0.9	-0.8	-0.7	-4.1%	-4.6%	-4.1%	-3.5%
CR04	-	18.5	18.2	18.2	18.4	18.3	18.3	-0.2	-0.2	-0.2	-0.1	-1.3%	-1.3%	-1.0%	-0.6%
CR05	-	17.8	17.6	17.6	17.8	17.5	17.6	-0.2	-0.2	-0.3	-0.2	-0.9%	-1.0%	-1.5%	-1.1%
CR06	-	18.4	18.3	18.4	18.6	18.4	18.5	-0.1	0.0	-0.2	0.0	-0.5%	0.1%	-0.9%	-0.3%
CR07	-	19.1	18.7	19.0	19.2	19.0	18.7	-0.4	-0.1	-0.2	-0.4	-2.1%	-0.7%	-1.0%	-2.2%
CR08	-	18.6	18.4	18.4	18.9	18.5	18.6	-0.3	-0.2	-0.3	-0.3	-1.4%	-1.3%	-1.7%	-1.5%
CR09	-	18.0	17.9	17.8	18.3	17.9	17.9	0.0	-0.1	-0.3	-0.4	-0.2%	-0.6%	-1.9%	-2.0%
CR10	-	21.5	21.0	21.0	21.2	21.4	21.1	-0.5	-0.5	0.2	-0.1	-2.3%	-2.3%	1.1%	-0.2%
CR11	-	18.1	17.9	18.0	18.1	17.9	18.0	-0.2	-0.1	-0.2	-0.2	-1.1%	-0.5%	-1.1%	-1.0%
CR12	-	18.0	17.7	17.8	17.6	17.6	17.9	-0.3	-0.1	0.0	0.3	-1.7%	-0.8%	0.0%	1.5%
CR13	-	16.7	16.6	16.6	16.8	16.7	16.7	0.0	0.0	0.0	-0.1	-0.3%	-0.1%	-0.2%	-0.6%
CR14	-	17.5	17.2	17.4	17.4	17.2	17.3	-0.4	-0.1	-0.2	-0.1	-2.0%	-0.6%	-1.3%	-0.8%
CR15	-	17.8	17.8	17.9	17.7	17.9	17.8	0.0	0.1	0.1	0.0	-0.2%	0.6%	0.8%	0.1%
CR16	-	17.8	17.4	17.3	17.5	17.5	17.6	-0.4	-0.4	0.0	0.1	-2.3%	-2.5%	-0.2%	0.3%
CR17	-	17.5	17.5	17.5	17.6	17.5	17.6	0.0	0.0	-0.1	0.0	0.0%	0.0%	-0.6%	-0.2%
CR18	-	17.7	17.5	17.5	17.7	17.5	17.6	-0.1	-0.1	-0.2	-0.1	-0.8%	-0.8%	-1.1%	-0.8%
CR19	-	17.4	17.4	17.4	17.3	17.3	17.3	0.0	0.0	0.0	0.0	0.1%	0.1%	-0.1%	0.2%
CR20	-	17.7	17.6	17.5	17.8	17.6	17.8	-0.1	-0.2	-0.2	0.0	-0.8%	-1.1%	-1.2%	0.0%
CR21	-	18.0	17.9	17.9	17.9	17.8	18.0	-0.1	0.0	0.0	0.1	-0.4%	-0.2%	-0.3%	0.8%
CR22	-	18.8	17.9	18.1	19.1	18.0	18.1	-0.9	-0.7	-1.1	-1.0	-4.8%	-3.9%	-5.5%	-5.4%
CR23	-	19.1	18.2	18.1	18.8	18.3	18.2	-0.9	-1.0	-0.5	-0.6	-4.6%	-5.4%	-2.5%	-3.3%
CR24	-	19.0	19.0	18.9	18.8	18.9	19.0	0.0	-0.1	0.2	0.3	0.1%	-0.4%	0.8%	1.5%
CR25	-	18.1	18.1	18.2	18.2	18.0	18.1	0.0	0.1	-0.1	-0.1	0.2%	0.8%	-0.7%	-0.3%
CR26	-	17.9	17.7	17.7	17.8	17.7	17.8	-0.3	-0.2	-0.2	0.0	-1.4%	-1.3%	-0.9%	0.1%
CR27	-	17.9	18.0	18.0	17.9	18.1	18.1	0.1	0.1	0.2	0.2	0.8%	0.8%	1.2%	1.2%
CR28	-	17.0	16.9	16.8	16.9	16.8	16.9	-0.1	-0.2	-0.1	-0.1	-0.5%	-1.0%	-0.6%	-0.4%
CR29	-	17.4	17.0	17.3	17.1	16.9	17.2	-0.4	-0.1	-0.2	0.2	-2.3%	-0.5%	-1.0%	0.9%
CR30	-	18.4	18.4	18.6	18.4	18.5	18.4	0.0	0.1	0.1	0.0	-0.2%	0.8%	0.6%	-0.1%
CR31	-	18.7	18.0	17.9	18.6	18.0	17.9	-0.7	-0.7	-0.7	-0.7	-3.8%	-4.0%	-3.6%	-4.0%
CR32	-	17.6	17.5	17.6	17.7	17.5	17.7	-0.1	0.0	-0.2	0.0	-0.7%	0.2%	-1.0%	-0.1%
CR33	-	18.6	18.6	18.6	18.6	18.7	18.6	0.0	0.0	0.1	0.0	-0.1%	0.0%	0.7%	-0.2%
CR34	-	18.4	18.1	18.1	18.4	18.1	18.1	-0.3	-0.1	-0.1	-0.1	-1.4%	-0.6%	-0.3%	-0.4%

Source : M4-M5 EIS_Vol 2C _Part B__App I Air quality _Annexures__part 4.pdf

Table K-43 Annual mean PM_{2.5} concentration at community receptors

Receptor	Annual mean PM _{2.5} concentration (µg/m ³)							Change relative to Do Minimum (µg/m ³)				Change relative to Do Minimum (%)			
	2015-BY	2023-DM	2023-DS	2023-DSC	2033-DM	2033-DS	2033-DSC	2023-DS	2023-DSC	2033-DS	2033-DSC	2023-DS	2023-DSC	2033-DS	2033-DSC
CR01	-	8.8	8.7	8.9	8.7	8.7	8.8	-0.07	0.09	-0.03	0.03	-0.8%	1.0%	-0.3%	0.3%
CR02	-	8.7	8.7	8.7	8.8	8.7	8.8	0.02	0.00	-0.05	0.06	0.2%	0.0%	-0.6%	0.7%
CR03	-	10.0	9.4	9.3	9.8	9.4	9.4	-0.60	-0.69	-0.33	-0.39	-6.0%	-6.9%	-3.4%	-4.0%
CR04	-	9.2	9.1	9.2	9.2	8.9	9.1	-0.10	-0.06	-0.27	-0.08	-1.1%	-0.7%	-2.9%	-0.9%
CR05	-	8.9	8.8	8.9	8.7	8.7	8.8	-0.12	-0.02	-0.01	0.08	-1.4%	-0.3%	-0.1%	0.9%
CR06	-	8.9	9.0	8.9	9.2	9.0	9.1	0.09	-0.01	-0.21	-0.04	1.0%	-0.1%	-2.3%	-0.4%
CR07	-	9.5	9.3	9.2	9.5	9.3	9.2	-0.16	-0.32	-0.21	-0.24	-1.7%	-3.3%	-2.2%	-2.6%
CR08	-	9.2	9.0	9.1	9.3	9.1	9.0	-0.23	-0.12	-0.26	-0.33	-2.5%	-1.4%	-2.8%	-3.5%
CR09	-	8.8	8.8	8.8	8.9	8.8	8.9	0.01	-0.01	-0.08	0.02	0.1%	-0.1%	-0.9%	0.2%
CR10	-	10.7	10.5	10.4	10.6	10.7	10.5	-0.22	-0.23	0.12	-0.13	-2.1%	-2.1%	1.2%	-1.2%
CR11	-	8.8	8.8	8.7	8.8	8.8	8.8	-0.03	-0.12	-0.02	-0.05	-0.4%	-1.4%	-0.2%	-0.5%
CR12	-	9.5	9.7	9.6	9.5	9.5	9.7	0.15	0.11	0.02	0.15	1.6%	1.1%	0.2%	1.5%
CR13	-	8.8	8.7	8.6	8.6	8.5	8.7	-0.09	-0.15	-0.08	0.03	-1.0%	-1.7%	-1.0%	0.3%
CR14	-	9.2	9.0	8.9	9.1	8.9	9.0	-0.19	-0.25	-0.20	-0.07	-2.0%	-2.7%	-2.2%	-0.7%
CR15	-	9.0	8.8	8.9	8.8	8.8	8.9	-0.20	-0.05	-0.04	0.12	-2.2%	-0.5%	-0.5%	1.3%
CR16	-	8.7	8.6	8.8	8.8	8.7	8.7	-0.06	0.08	-0.17	-0.19	-0.7%	1.0%	-1.9%	-2.2%
CR17	-	8.8	8.7	8.5	8.6	8.6	8.6	-0.11	-0.21	-0.08	-0.05	-1.2%	-2.4%	-0.9%	-0.6%
CR18	-	8.8	8.6	8.7	8.8	8.7	8.7	-0.15	-0.06	-0.09	-0.09	-1.8%	-0.7%	-1.0%	-1.0%
CR19	-	8.7	8.5	8.6	8.6	8.5	8.6	-0.12	-0.08	-0.07	0.00	-1.4%	-0.9%	-0.8%	0.1%
CR20	-	8.8	8.7	8.7	8.7	8.7	8.8	-0.03	-0.10	-0.03	0.09	-0.3%	-1.1%	-0.3%	1.0%
CR21	-	8.8	8.7	8.7	8.8	8.8	8.9	-0.09	-0.10	-0.05	0.07	-1.0%	-1.1%	-0.5%	0.8%

Source: M4-M5 EIS_Vol 2C _Part B__App I Air quality _Annexures__part 7.pdf

Rozelle

Rozelle Rail Yards and Rozelle Civil Site

Rozelle is the proposed site of a massive interchange that would be built underground. This part of the 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. 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.

There is no evidence that the Sydney Motorway Corporation or its potential contractors have the experience that would be required to build the concept in the EIS.

Construction Impacts

We are upset that already the Rozelle railyards are being torn up on the basis of this flimsy EIS. 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 massive 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. This is just another example of the lack of public consultation for the project.

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 would be approximately 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 suburbs 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 Yards site will generate an enormous amount of traffic in an already congested area. We think this has been underestimated in the EIS and ask that the assessment of the impact be independently evaluated.

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.

There would 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. There will

be a **big increase in traffic congestion in this area, the main route to Anzac Bridge and Victoria Rd.**

Criss-crossing Tunnels under homes

According to the 'concept design', the tunnels under Rozelle/Lilyfield are going to be in 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 hold up on the deepest of these tunnels, the air quality will very quickly become toxic unless substantial air conditioning is a major part of the design.

It would be socially irresponsible to approve this project.

3.0 Air Quality

CAW objects to the M4-M5 Link as outlined in the Environmental Impact Statement. My 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 modelers have a long record of poor predictions in Australia and elsewhere.

Costs of Air pollution

The health costs of air pollution in Australia are estimated to be in the order of \$11.1 billion to \$24.3 billion annually, solely as a result of mortality (Begg et al. 2007; Access Economics 2008). For the Greater Metropolitan Region of Sydney alone it has been estimated that the health costs of air pollution range between \$1 billion to \$8.4 billion (NSW DEC 2005).

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.

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.

The EIS claims that the annual mean PM 2.5. levels are expected to increase on the streets listed in the table below if the M4-M5 link is built and open to traffic in 2023. A WHO fact sheet claims that "There is a close, quantitative relationship between exposure to high concentrations of small particulates (PM₁₀ and PM_{2.5}) and increased mortality or morbidity, both daily and over time. Conversely, when concentrations of small and fine particulates are reduced, related mortality will also go down – presuming other factors remain the same." (WHO 2016). It goes onto say that "The most health-damaging particles are those with a diameter of 10 microns or less, (\leq PM₁₀), which can penetrate and lodge deep inside the lungs. Chronic exposure to particles contributes to the risk of developing cardiovascular and respiratory diseases, as well as of lung cancer." A number of studies have linked increased PM levels to respiratory diseases, increasing rates of hospitalisation and preterm births (Brunekreef and Holgate 2002, Orru et al. 2010; Huynh et al. 2006, Zabnobbetti et al. 2009, Dominici et al. 2006).

It is unacceptable to expose residents and workers in the areas listed below to increased levels that bring them closer to the NSW PM2.5 threshold. An article published in the Lancet states that "There is now no doubt that air pollution, and especially fine particulate matter (PM_{2.5}), has many serious consequences for health and leads to avoidable premature

deaths” and that “that there is no safe threshold level, rather a linear concentration-response relationship.” (Lanclet 2013). And in another scientific publication Giannadaki et al. 2016 have asserted that “ there is no strong evidence for a “safe” PM_{2.5} concentration threshold below which no health risk can be assumed ” In light of this it is important that this part of the WestConnex Project, and the project overall is stalled. **There also needs to be a written explanation to residents, workers and regular visitors in areas which will see an increase in PM levels and other pollutants as to why it considered acceptable to expose them to such pollutants, especially given that PM 10 is a carcinogen and there are no safe levels of PM 2.5.**

Location	Increase in PM 2.5 (µg/m3)
Burrows Road, Alexandria (near St Peters)	0.18-1
Gardeners Road, Alexandria	0.18-1
Kent Road, Mascot	0.18-1
Bourke Road, Mascot	0.18-1
O’Riordon Street, Mascot	0.18-1
Botany Road, Mascot	0.18-1
Albert Street, St Peters	0.18-1
Euston Road, Alexandria	0.18-1
Ada Place, Pyrmont	0.18-1
Church Avenue, Mascot	0.18-1
Miles Street, Mascot	0.18-1
Hughes Avenue, Mascot	0.18-1
Coward Street, Mascot	0.18-1

Carinya Avenue, Macot	0.18-1
John Street, Mascot	0.18-1
Western Distributor (Sydney Fish Market)	0.18-1
Saunders Street (Near Western Distributor, Sydney Fish Market)	0.18-1
Bank Street (Near Western Distributor, Sydney Fish Market)	0.18-1
Bulwara Road (Sydney Fish Market)	0.18-1
Sydney Fish Market	0.18-1
Mount Street , Pyrmont	0.18-1
John Street, Pyrmont	0.18-1
Quarry Master Drive, Pyrmont	0.18-1
Little Mountain Street, Pyrmont	0.18-1
Miller Street, Pyrmont	0.18-1
Harris Street (Between Miller Street and Pyrmont Bridge Road)	0.18-1
Harris Street (between Allen Street and Pyrmont Bridge Road near Sydney Fish Market)	0.18-1
Experiment Street, Pyrmont	0.18-1
Pyrmont Street, Pyrmont (Next to Oaks Goldsborough Apartments)	0.18-1
Jones Lane, Pyrmont	0.18-1

Fig Street, Pymont	0.18-1
Darling Harbour area	0.18-1
Campbell Street, St Peters	0.18-1
Barwon Park Road, St Peters	0.18-1
Frederick Street, Ashfield	0.18-1
Henry Street, Ashfield	0.18-1

Source: M4-M5 EIS_Vol 2C _Part B__App I Air quality _Annexures__part 7.pdf

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.

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 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.

We note that the Education Minister, who as Planning Minister approved the M4 East and New M5, stated that he would not allow unfiltered ventilation stacks in his electorate.

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 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.

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.

St Peters

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 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 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.

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.

More stacks?

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.

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 signs 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.

We demand that NSW Planning respond to this specific concern, rather ignoring it as has occurred with responses to the EIS for the M4East 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 annual mean 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, (DS 2023-DM 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. The project should be rejected on the grounds that it will give a detrimental impact on air quality and people's health.

There also needs to be a written explanation to residents, workers and regular visitors in areas which will see an increase in PM levels and other pollutants as to why it is considered acceptable to expose them to such pollutants, especially given that PM 10 is a carcinogen and there are no safe levels of PM 2.5.

Location	Increase in PM10 (µg/m3)
Active Kids Mascot	0.4
Burrows Road	0.5-1, around 2 in some areas
Gardner Road	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 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 PM_{2.5} 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.

We are 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.

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.

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 and evidence.

The Environmental Impact Statement (EIS) for the WestConnex M4-M5 link predicts that overall air quality will be improved by 2033 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.

1) 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.

2) 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 plain stupidity and 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.

3) 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, presumably as a consequence of technological and legislative changes. 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. The EIS should also have compared a scenario with the anticipated air quality improvements in 2033 and 2023, where NO STAGES of the WestConnex projects had been built, with the Do Minimum, Do Something and Do Something Cumulative criteria. We are asking for this to be done now.

4) 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.

4.0 Social and Economic Impacts

One reason that we strongly object to this WestConnex Stage 3 proposal is that I'm concerned about its 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 HillPDA to do the study. HillPDA was involved with AECOM in studying and promoting the UrbanGrowthNSW 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 my 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 problem 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.

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.

Construction fatigue glosses over real world experience with WestConnex

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. We 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,

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 review the impacts of existing construction. The failure to do so simply reinforces the impression that the findings are a foregone conclusion.

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.

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.

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.

Noise Impacts

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 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 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.

Vibration

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.

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.

We have regularly visited the Haberfield and St Peters construction sites. Like many others we were shocked when we saw the scale of the devastation but even more shocked when we 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.

Overall impacts during construction on many 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 are very concerned about 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?

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 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.

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.

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.

Of course, we do 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 study also deals with the impact of tolls. We don't think the EIS accurately reflects evidence of the impact of tolls on less advantaged communities, although it does acknowledge it as a problem. It makes no attempt to consider the long-term impacts on the cost of living for drivers of decades of escalating tolls.

Having dealt with the negative impacts, the EIS Social and Economic Impact study then predictably turns to the positive impacts of the project. These 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 which carries such negative impacts for hundreds of thousands of residents, on the basis of such speculative and uncertain evidence. We ask you to reject the project.

5.0 Consultation

Overall, there has been a lack of meaningful consultation with stakeholders and the community before this EIS was lodged. Since “meaningful consultation” was one of the Secretary’s requirements, we ask that you reject this EIS on this basis alone.

It is shocking to think that a project of this magnitude should have had such poor and inaccessible presentation of its concept design.

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 PR spin and bears no reality about the real outcome of the build. This cynical approach to achieving planning approval undermines public confidence in the planning process.

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 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.**

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.

Insufficient Detail for Approval

- This EIS provides no basis on which to approve such a complex project including the building of interchanges underneath Sydney suburbs Rozelle and Leichhardt. It would be absurd to approve the building of up to three tunnels under people’s homes based on such flimsy information. We are appalled that the Sydney Motorway Corporation could seek approval to build complex interchanges under the suburbs of Rozelle and Leichhardt based on an EIS that is grounded mostly on a concept design rather than detailed proposal that includes engineering plans.

- 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. It is unstated just who would have responsibility for such a "review(ed) for consistency", and how these changes would be communicated to the community. The EIS should not be approved till significant 'uncertainties' have been fully researched and surveyed and the results (and any changes) published for public comment (i.e.: the Sydney Water Tunnels issues at 12-57)
- 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 on 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.
- 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.

- The EIS uses maps indicating alignment of the mainline tunnels. It is clear from more detailed reading deep into the EIS (i.e. 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 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.
- Insufficient time has been given for the community to prepare submissions to the EIS, especially when one considers that whole neighbourhoods affected by the project were not even notified during the concept design period. e.g. Newtown, east of King St.
- 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.
- The EIS at 7-51 refers to concerns that were raised by the community that the alignment of tunnels in Newtown appeared to go to the east of King Street, an area that had had no geotech drilling or testing. SMC staff indicated at Community information sessions that the maps included in the Concept Design were broad and indicative only, and that further details would be available in the EIS. No further details have been provided. This casts doubt over the integrity of the entire EIS process.
- 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 kilometer 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.

- It is obvious the NSW government is in a desperate rush to get planning approval for the M4/M5. It has only allowed 60 days for comment yet the M4/M5 project is the most expensive and complicated stage of WestConnex. Critically, it involves building three layers of underground tunnels under parts of Rozelle. Such tunneling does not exist anywhere in the world and yet there are no engineering plans for this complex construction. Approval depends on senior staff in NSW Planning compliantly agreeing to tick off on the EIS, as was done with the New M5 and the M4. This demonstrates a wanton disregard for the safety of the residents of Rozelle and those who will be using the tunnel. WHAT IS THE RUSH?
- The EIS does not provide any opportunity to comment on the urban design and landscape component of the project. It states that 'a detailed review and finalisation of the architectural treatment of the project operational infrastructure would be undertaken 'during detailed design'. The Community should be given an opportunity to comment upon and influence the design and we object to the approval of the EIS on the basis that this detail is not provided, nor is the community (or other stakeholders) given an opportunity to comment or influence the final design.

Inadequate Public Consultation/Failure of Planning Process/Failure to Consider Alternatives

- 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.
- We are concerned that the EIS provides no reasons why the City of Sydney's alternative plan might not be preferable to the proposed WestConnex.
- 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.
- There has been no 'meaningful' consultation with the community. Some areas affected by M4/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 identifies hundreds of risks at different construction sites. In relation to these risks the EIS recommends proceeding despite the risks; or seeking a way to mitigate risks during the “detailed design” phase. That phase excludes the public altogether. That is, the M4/M5 should be approved with no calculation of risks or what mitigation may mean for impacted residents.
- The EIS at 7-25 refers to 876 comments (limited to 140 characters) made via the collaborative map on the Concept Design ‘up to July’ that were considered in the preparation of the EIS. It does not mention the many hundreds of extended written submissions that were lodged in late July and early August. These critical ‘community engagement’ feedback submissions have clearly not been considered in the preparation of the EIS. This casts doubt over the integrity of the entire EIS process.
- The EIS claims to have saved Blackmore Park and Easton Park due to negative community feedback. We are concerned that this is a false claim and that this site was never really in contention due to other physical factors. We would like NSW Planning to investigate whether this claim is correct to have heeded the community is false or not.
- 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.
- In order to access material from the EIS online one must be computer literate, have a good desktop or laptop, have good eye sight and a good internet connection. We feel that this format of consultation is a farce and a violation of people’s right to develop a well-informed opinion of, and to influence the WestConnex project, which is having and will continue to have a huge impact on the environmental and social fabric of Sydney. It excludes those of us who do not have adequate time, material and informational resources to pour over the EIS. Thus, the data it contains and the consultation process more broadly is inaccessible to many people across Sydney. This really undermines the democratic principles that should underpin the planning process.
- 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.

- A lot of the information provided in the EIS will just not be 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 by 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 are certainly not arguing for a dumbing 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 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.

6.0 Contamination

EIS does not meet Secretary's Requirements

The Secretary's Requirements for the EIS (SEARS) state that:

'3. 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. Table 16-23.'

The EIS does identify many 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:

'7. 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 groundwater 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.**

Rozelle and Annandale Risks

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 because 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 storm water 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. (See Table 16-6) 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.

High risks for St Peters

'High' risks of further contamination and landfill gas and leachate has also been identified in proposed Stage 3 works at Campbell Road civil and tunnel site (C10) at St Peters

The EIS notes that the "remediation and management of the site is being undertaken as part of the construction of the St Peters interchange for the New M5 project." The EIS fails to note the enormous difficulty that NSW Environment Protection Authority has had in trying to ensure that SMC's contractors comply with the EPA license granted as part of the Stage 2 approval process or the fact that SMC have already been fined for breaches. The CEO of the EPA, Mr. Buffier wrote to the WestConnex Action Group stating that due to the Planning Act Critical infrastructure Provisions, the EPA cannot prohibit work on the site. This is a huge issue for the community and cannot be ignored during the consideration of this EIS. **It is intolerable that the NSW government should identify high risk to community health from some unknown future contractors without knowing that it could prevent damage resulting from those risks.**

As has been shown during Stage 2 works in St Peters, the EPA simply does not have the staff or resources to monitor whether contamination occurs. During 2017, St Peters residents experienced and documented ongoing uncontrolled sickening odours that seriously impacted on the quality of life of thousands of residents and in the case of some individuals, affected their physical health as well. When severe problems with odours occurred, SMC initially batted them away – only after a large number of complaints, did the EPA take action to strengthen license requirements. Even then odours from landfill continued for several months. Residents have been told that the odours may reoccur over the next few months.

This EIS states that there is a high risk that further excavation activities at St Peters could cause dust and odour risks to WestConnex workers as well as 'surrounding land users' which includes residents, other workers and users of Sydney Park. Risks to local soil and water quality are also identified. **To expose a residential community that will have already suffered severe impacts from construction for three years to further high risks of continuing impacts for an additional three years is simply unacceptable.**

The notion that this open ended and uncertain proposal could be approved without the EPA being able to stop work, is alarming and distressing to residents across the project. No further licences should be granted for this or any other project in circumstances in which the EPA cannot prohibit work.

7.0 Flooding and Drainage

We object to this EIS because we believe the rushed document which has little detail is exposing residents to serious risk.

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. We urge NSW Planning to reject this option.

8.0 Green House Gas

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, however under the 2023 'cumulative' scenario, 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.

9.0 Human health

Much of the EIS human health assessment is based on the Air quality report. For submissions on this see our Air Quality sample submission.

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 repeatedly.

10.0 Non-Aboriginal heritage

Destruction of heritage for WestConnex should be prohibited

The project directly affects five listed heritage items, including demolition of the storm water 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 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.

CAW objects 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.

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 M5/M5 tunnel would further add to this loss.

CAW objects 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.

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 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.

We 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.

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.

11.0 Soil and Water Quality

CAW objects to the M4-M5 Link as outlined in the Environmental Impact Statement on the basis that 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. Specifically, for the following reasons:

- 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 storm water, rinse water from plant washing and concrete slurries. Water from tunneling 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.
- 001. 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.
- 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 near. 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 storm water 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.

12.0 Traffic and transport

CAW objects 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 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 the 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.

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. This stage will deliver none of the promised connections to the Sydney Airport or Port Botany which were the purpose of the original WestConnex project. 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.

Traffic modelling is an inexact process

Traffic modelers 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' rather than delays to reliable and efficient access to human capital, goods and services which reduces 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 toll road 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?

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.

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. 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.

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.

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 the signaling 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 centered on Parramatta Rd. Bus service needs further west are not mentioned. The discussion of active transport alternatives gets no further west than Parramatta.

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. 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.

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 worsen public transport options.

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.

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.

Benefits depend on unplanned, unapproved toll roads

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.

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.

Inadequate traffic modelling

The traffic modelling has not been adequate to model the impact on local roads. The explanation given by AECOM at public EIS sessions to this criticism is that the parameters of the traffic modelling are dictated by NSW RMS. While this may be true, it provides no excuse for why the resultant EIS is inadequate.

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?

Johnston Street, The Crescent/Minogue Crescent and Ross Street

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.

Traffic exceeding operating limits

If one assumes that the modelling is correct, it shows the Stage 3 motorway would exceed reasonable operating limits in the peak 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 unpredictable 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)

More specific problems

Where the modelling shows traffic beyond capacity at The St Peters / Sydney Park Interchange resulting in an overloading of the Mascot road network, traffic levels were 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.**

The modelling shows 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

The People's EIS regards these results 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.

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

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

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.

Conclusion

- It is highly likely that the EIS traffic report will turn out to be inaccurate.
- It fails to properly or adequately assess the impact on local roads.

- It fails to adequately consider tolls avoidance.
- To the extent that it does accurately predict impacts and traffic changes, it shows that WestConnex will produce not solve traffic congestion.
- Indeed, in many respects, it shows that traffic will be worse as a result of Stage 3. Any positive case depends on the building of other tolls roads which have not been planned or approved and to which there are many objections.

From: [REDACTED]
Sent: Mon, 16 Oct 2017 02:25:45 +0000
To: [REDACTED]
Subject: FW: Submission Details for Richard Hemming (object)
Attachments: 228060_Submission for M4-M5 Link EIS_161017_2017Oct16_1322.pdf

From: system@accelo.com On Behalf Of Richard Hemming
Sent: Monday, 16 October 2017 1:23:12 PM (UTC+10:00) Canberra, Melbourne, Sydney
[REDACTED]
Subject: Submission Details for Richard Hemming (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Richard Hemming
[REDACTED]

Address:
[REDACTED]

Rozelle, NSW
2039

Content:

I object to the WestConnex M4-M5 Link EIS; my phone is 0415067770; Please see attachment 1

[REDACTED]
Submission: Online Submission from Richard Hemming (object)
https://majorprojects.accelo.com/?action=view_activity&id=228060

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

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

**To: NSW Department of Planning; Minister for Planning in NSW:
Robert Stokes**

**From: Richard Hemming, resident, 6 Crescent St, Rozelle, NSW,
2039, 0415067770**

date: 16 October 2017

I OBJECT to the WestConnex M4-M5 link.

The then WestConnex Delivery Authority (now Sydney Motorway Corporation) has repeatedly said that the Environmental Impact Statement (EIS) is the primary means of community consultation on the M4 East, despite pre-empting the planning approval process by signing a contract to build it.

The EIS assessment process has manifestly not been the means of meaningful community consultation as we had been promised.

There are real problems with the process and the fact that there has not been consultation. Below are just some of them:

1. **There is going to be a huge smoke stack opposite the Rozelle Public School.** Would you or your partners allow this to happen if your children were affected. This will increase the chances of cancer; pollution poisoning and disease.
2. **The M4-M5 link will create more congestion onto the ANZAC Bridge, which is already too congested.** It is the worst infrastructure decision that I can remember. Far from ameliorating travel times into the city, it will increase them. The problems stem from the lack of community consultation, which I will elaborate on below.
3. **Residents did not have complete information on the project on which to base their submissions at the commencement of the M4 East EIS exhibition period.**

In response to submissions made, Road and Marine Services' (RMS) Submissions Report often refers to information in the *WestConnex Updated Strategic Business Case* of November 2015, so this must be considered integral to the EIS. Yet the *Updated Strategic Business Case* was only published after the closing date for the M4 EIS submissions of 2 November 2015. This is important as the M4 East and other stages cannot be considered separately from WestConnex as a whole. And there has never been an opportunity to comment on the WestConnex business case. This is a justification for starting the M4 East EIS exhibition process afresh, so that stakeholders and interested parties have the full information on which to base submissions.

4. NO independent process of review and assessment of issues raised in submissions on the EIS.

The Submissions Report on the Planning website has been prepared by the project's proponent, Roads and Maritime Services, which was in turn delegated to the consultants who prepared the EIS and to the successful tenderer to prepare the responses to the submissions.

This is a complete conflict of interest. Not one of the many substantive issues identified in thousands of submissions are seen to have any merit by RMS. This is unbelievable and wreaks of a rubber stamping exercise; not of community consultation.

5. The Submissions Report is highly discriminatory in the way it responds to different classes of submitters.

It responds to 'stakeholder submissions' (government agencies and local councils) by addressing those submissions point by point. Whereas it makes a general response to 'community submissions', clustering points made in these submissions into categories and providing generic responses. 'Community submissions' come from two sources; private individuals (such as myself) and non government organisations. The submissions by some of the latter are very comprehensive and technically competent, superior to some of the 'stakeholder submissions'. I draw your attention for example to the submission by the WestConnex Action Group (4872). And I have stumbled on some highly comprehensive and technical individual submissions, for example Kathy Calman (4850), and 1871 with a redacted author. These are remarkable in that they have been prepared by people in their own time and under tight timelines. And yet irrespective of the effort that has gone into the submission, and the pertinence of the points made, these are bundled into the second class category of 'community submissions'. This is contrary to notions of a pluralistic civil society which we purport to be, in which communities as well as government are stakeholders.

At the very least, submissions by non government organisations should be responded to in the same way that is done with government organisations, that is point by point.

6. As I see it these are the big problems with the report that have not been addressed:

Government secrecy and avoidance of public scrutiny

The EIS not being the appropriate opportunity to comment on WestConnex

WestConnex is poor strategic policy

WestConnex is an outdated concept and poor planning policy

WestConnex is an aesthetic disaster for the inner west

Close off Chandos Street, Ashfield where it meets Parramatta Road

I ask that my complaints be addressed before a determination is made on the M4 East planning application.

I look forward to receiving your response to my letter.

Yours sincerely

Richard Hemming

0415067770

From: [REDACTED]
Sent: Mon, 16 Oct 2017 02:28:09 +0000
To: [REDACTED]
Subject: FW: Submission Details for company Inner West Bicycle Coalition (org_comments)
Attachments: 228068_Submission on M4-M5 EIS _1__2017Oct16_1326.pdf

From: system@accelo.com On Behalf Of Neil Tonkin
Sent: Monday, 16 October 2017 1:27:13 PM (UTC+10:00) Canberra, Melbourne, Sydney
[REDACTED]
Subject: Submission Details for company Inner West Bicycle Coalition (org_comments)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Neil Tonkin
Organisation: Inner West Bicycle Coalition (Advocacy Coordinator)
Govt. Agency: No
[REDACTED]

Address:
[REDACTED]

Lilyfield, NSW
2040

Content:
We attach for your information our submission on the M4-M5 Link EIS

[REDACTED]
Submission: Online Submission from company Inner West Bicycle Coalition (org_comments)
https://majorprojects.accelo.com/?action=view_activity&id=228068

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

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



Submission on M4-M5 Link EIS (SSI 16 7485)

The Inner West Bicycle Coalition (IWBC) is comprised of the three bicycle user groups, Bike Marrickville, Bike Leichhardt and Ashfield Bicycle Users Group that worked closely with the former municipalities of Ashfield, Leichhardt and Marrickville.

Our aim is to promote the use of bicycles as an element of Active Transport for reasons of health, ecological sustainability and social equity.

Key comments on the M4-M5 Link EIS, in particular on the Active Transport Strategy.

1. The Active Transport Strategy (ATS) only provides indicative designs for a basic bicycle network planned in the area covered by the M4-M5 Link. Often detailed plans are required in consent conditions for successful bicycle facilities to be created. We ask that detailed designs be included in the Conditions of Consent.
2. Some parts of the Active Transport Network (ATN) are funded by the project. However many parts of the ATN are shown as funded by 'others', usually local councils, RMS and other state authorities. It is inequitable that such basic bicycle facilities proposed in the ATN are not funded yet the major elements of the motorised routes in the project are fully funded. Bicycle facilities provision lags far behind motor vehicle based development in the state. We are seeking that it be a Condition of Consent that the elements funded by 'other' authorities are included in the funding for this project.
3. There are many parts of the ATN that are fundamental to a viable bicycle network being planned and built in the Inner West of Sydney. However we outline below the most crucial elements of the ATN that should be included in the Conditions of Consent:
 - 3.1 A quality cycle link from all Iron Cove Bridge southern approaches along the Victoria Road easement to the ATN planned routes to Anzac Bridge at the Crescent, Rozelle.
 - 3.2 A quality off-road link (City West Cycle Link) from Hawthorne Canal to Anzac Bridge utilising the favourable grades enjoyed by the Light Rail in the rail corridor.

3.3 A cycle link from The Crescent, Rozelle to Redfern via Sydney University and crossing the railway corridor at Eveleigh to Alexandria and Botany via a grade separated facility.

3.4 Separated cycle facilities along Johnston St Annandale from The Crescent to Parramatta Rd Stanmore.

3.5 Cycle facilities from Waratah St, Haberfield to Ashfield Station including a separated crossing of Parramatta Rd at Bland St, Haberfield.

3.6 Continue the separated bicycle path on Campbell St NW across the railway at Bedwin Rd, St Peters, linking to the proposed separated path along the new Bankstown Metro Corridor, through Marrickville to the end of Darley St, with a connection to Carrington St cycleway.

We also make comments on the loss of Buruwan Park and on some of the traffic arrangements during construction of the M4-M5 Link.

Detailed comments

Comments are mainly restricted to the Active Transport Strategy, Appendix N, and on the Effects of Construction of the project, chapter 8, of the EIS.

IWBC is broadly opposed to new urban motorways but we note that the SEARS for this EIS, in particular Traffic and Transport 2(g) and 2(h) and Urban Design 7(a), (b) and (c), do require that bicycle infrastructure and access in the project and broader area should be considered and improved, even if it is not directly part of the motorways and could have been dismissed as "outside the scope" of the project, as has been the case in some other recent projects, including the M4 and M4 East.

The inclusion of an Active Transport Strategy and Network in the M4-M5 Project is therefore welcome, as it recognises the need and the opportunity to improve and extend bicycling infrastructure in a broad area of the Inner West. The ATS does provide a framework for building new bicycle infrastructure and extending the existing network of bicycle routes and facilities, but the EIS fails to provide any certainty that routes such as that recommended along Victoria Rd or Whites Ck will be built, design being "indicative" and construction left to "others". Detailed design work for other routes recommended in the ATS, such as the paths along and across the Rozelle Rail Yards, is also being left to the yet-to-be-decided contract winner, leaving them open to changes or being dropped. We seek greater certainty that the final ATS will be implemented.

The Project is likely to increase the amount of motor traffic on Inner West roads such as The Crescent, Johnston St, Catherine St and Addison Rd. It is essential bicycling infrastructure is provided or improved on these streets. It is claimed that traffic will reduce on Victoria Rd and Parramatta Rd, and possibly on Balmain Rd, thereby making these roads candidates for

allocation of road space for improved cycling facilities.

We recognise the ATS is a starting point for an overall network and that the eventual network will involve the efforts of the Inner West Council, RMS and other authorities, but we would hope that the network and, in particular, funding, can be better identified and "locked in" as a Condition of Consent for the Project, even if the work is carried out by "others", as is frequently stated in the ATS. Or it could be undertaken as a related but separate project, as was the Victoria Rd Cycleway Improvement Project associated with construction of the new Iron Cove Bridge. Other authorities such as Sydney Metro and Urban Growth should be part of the Active Transport part of the Project, to achieve an efficient Whole of Government approach.

This would apply to the most valuable bicycle links, which we see as:

The City West Cycle Link, the route as conceived by BIKESydney originally, running from Pyrmont via the Glebe Island Bridge, through the Rail Yard at grade and next to the light rail line that runs through the deep cutting under Balmain Rd and Norton St to Hawthorne Canal). The CWCL is further discussed below.

Victoria Rd between Iron Cove and the intersection with The Crescent (City West Link).

We see it as inequitable and inconsistent that road traffic gets connected facilities from Iron Cove to the Railyard in tunnels but cyclists get only stubs of cycleways at either end, leaving the main section of Victoria Rd between about Terry St and Robert St to be, possibly, built by "others". We would strongly urge that the Conditions of Consent for the Project include an agreement with RMS that the whole cycleway would be built.

Road space on Victoria Rd can and should be reallocated to bicycle paths or lanes if the claimed traffic reduction is accepted. A separated two way bicycle path would be desirable for commuter cyclists. The current shared path on the north side of Victoria Rd needs to be improved and duplicated where practicable on the south side, to link with the new Iron Cove Bridge cycleway and provide overall connectivity and amenity for local cyclists, i.e. those not commuting to the City.

The Crescent, between City West Link and Ross St.

There are opportunities for direct reasonable grade on- or off-road bicycle facilities along the length of The Crescent, including Minogue Crescent, to Ross St and Sydney University. A major restraint is the railway bridge at Johnston St. Widening of The Crescent is being proposed between the CWL and Johnston St. If widening of the road under the bridge southbound is not possible or contemplated due to the brick bridge supports, a bike path on the other side might be possible, between the bridge piers, after crossing Johnston St. The bike path would lead to a crossing of The Crescent into the new parkland being developed by City of Sydney Council, with a link to the existing bypass route on Chapman Rd. From the roundabout at Chapman Rd on The Crescent the cycleway would continue as a shared path (already constructed as part of the Harold Park development) along The Crescent to Wigram

Rd. We would like this option to be considered as it provides a fast direct link rather than convoluted routes on Johnston Ck and Orphan School Creek.

Further link from Sydney University to Redfern and Alexandria.

The route along The Crescent and Ross St could continue through The University to Redfern. A bridge over the railway in the vicinity of the Australian Technology Park has been mooted for some time (e.g., Key Move number 3 in Urban Growth's Central to Eveleigh Transformation Strategy) would allow a connection via Phillips St, Alexandria, to the south to join the Bourke Road cycleway or Alexandria Canal cycleway (when constructed).

Johnston St.

This wide Boulevard is eminently suited for separated cycle paths and provides a lengthy relatively flat north south route, past schools and shops. We again strongly urge that a separated cycleway on Johnston St be included in the conditions of consent.

Whites Creek.

The ATN should include constructing or improving the existing cycleway along the whole length of Whites Ck and Whites Lane through to Albion St as part of the Project, not leave it to "others", or it should be otherwise agreed that it will be funded and built.

Balmain Rd between Victoria Rd and City West Link.

Balmain Rd is the most direct and flattest bike route connecting Rozelle and Leichhardt, and has a partial off road section between the Secondary College and the City West Link plus some bike lanes and bike shoulders in the Leichhardt section.

Improvements to allow safer cycling would include signalised bicycle crossings on all four sides of the City West Link so the east side footpath can be used southbound over the rail bridge, a widening of the footpath on the west side of the rail bridge at Lilyfield Rd, or a road realignment, and using a reallocated parking lane on the non-residential side of Callan Park frontage, or a route within Callan Park.

Reduced traffic on Victoria Rd should mean reduced traffic on Balmain Rd and Darling St, improving bicycle safety and attractiveness. A safe bicycle crossing of Victoria Rd on Darling St is needed. This should be addressed as part of the Victoria Rd cycleway design.

Darley Rd between Allen St and City West Link.

A cycleway can be created by reallocation of the parking lane on the non residential railway side of the road for most of this route. A reconstruction and gradient smoothing of the final approximately 50m of existing steep footpath as a shared footpath immediately before the CWL would greatly improve this route for cyclists and pedestrians.

In Ashfield, bicycle facilities on Bland St

A grade separated bicycle crossing of Parramatta Rd at Bland St should be included in the ATN, to provide bicycle access to and from Haberfield, with links to Waratah St and Dalhousie St via e.g. Denman Avenue in one direction and Ashfield and Frederick St in the other.

Frederick St could have a bicycle path on one side or lanes on both sides, as it is largely No Stopping at present. Or a route developed along the line of Iron Cove Ck, with a crossing of Parramatta Rd.

The EIS states that bicycle facilities between Waratah St and Parramatta Rd on the City West Link/Wattle St are considered to be part of the M4 East project and are not being included in the M4-M5 EIS because there were no previous facilities. However this was a serious omission in the original CWL design and it leaves the existing path between Timbrell Drive and Waratah St possibly unconnected or underutilised. This section should be included in the ATN as a bicycle connection between Waratah St and Parramatta Rd, or improving whatever is being built as part of the M4 East project. Clearly safe links across Parramatta Rd into Ashfield and Croydon areas are sorely lacking.

In Marrickville, Bedwin Rd bridge over the railway is a major impediment to NW/SE travel for cyclists, with narrow footpaths and four lanes of fast traffic. The bridge needs modification or a clip-on bridge for bicycles built.

Cycleway between Bedwin Rd and Cooks River.

A link is needed from Bedwin Rd/ Enmore Rd to Cook's River. This could run via Edinburgh St and Sydney Steel Rd, to Shirlow St and Sydenham Rd, with a link to Sydenham Station. The cycleway would then extend further to Fraser Park, via rail underpasses or bridges, to Carrington Rd cycleway or through the Mirvac development to Tempe, and to Marrickville Station and end of Darley St (SW Metro linear park, working with SW Metro and Urban Growth). Alternatively, a bike path could run in the parking lane along the non-residential side of Unwins Bridge Rd to Sydenham Station, possibly also via Bolton and Burrows Sts next to the railway.

In view of the many authorities involved in this area a whole of government approach is needed, but cementing these links into the ATN as a condition of assent and providing funding would be a start.

In Stanmore/Petersham the ATN shows a link (joining with the Whites Creek Lane route) from Parramatta Rd at Phillip St to Addison Rd via back streets and a section of Crystal St. The proposed route is rather convoluted and a simpler route using Westbourne Lane, Douglas St and the Crystal St footpath over the railway bridge to Frederick St would be better in our view. A bicycle crossing of Stanmore Road at John St has long been called for.

Comment on the bicycle paths in the Rozelle Rail Yard.

The east west route proposed from Lilyfield Rd near Justin St eastward along the Rail Yard and under Victoria Rd bridge is welcomed, as providing an opportunity for a high quality commuter and recreational route towards the City. It replaces the need for commuters to the City to use Lilyfield Rd east of about Justin St. It should be built as a high standard separated bike and pedestrian path, as on the Bay Run. The connection to the Anzac Bridge cycleway needs careful design. This is discussed below.

In view of the SEARS requirement that access to White Bay and the Bays Precinct be identified and preserved (SEARS 7 Urban Design¹ (a) to (c)) we are surprised the connection to Robert St in Rozelle, in front of the Power Station, to join the existing bike route to East Balmain, is not included in the links to be built by the Project. The eagerly sought link to the Glebe Island Bridge is not shown at all. Even though other authorities will have a big say in these eventual linkages it is important in our view to have these continuations firmly identified in the Project. The link to Robert St would seem to be easily achievable in the short term, on flat and level land, even if future plans for the area necessitated rerouting. The link to the Glebe Island Bridge should at least be mentioned as requiring preservation even if an exact route is not yet determined.

Urban Growth consistently supported reuse of the Glebe Island Bridge in its Bays Precinct plans and adjacent Councils also strongly support this.

The City West Cycle Link to Hawthorne Canal.

The section of the CWCL, as proposed by Bike Sydney, through the railway cutting is mentioned in the ATS and shown on the ATN plan and this is also strongly welcomed. We seek that it be included in the Project (or as a mandated standalone Project) rather than being left for "others" to build. The CWCL would of course coincide with the ATS proposed east west link in the Railyard and, in its complete form, provide a flat route between Hawthorne Canal and the Glebe Island Bridge, avoiding the steep terrain of the leichhardt ridge.

An idea that could be explored is to have a full tunnel for cyclists rather than the side cut into the cutting rock face next to the light rail as originally proposed by Bike Sydney. This would eliminate any difficulties associated with working next to the light rail through the cutting, although night work is a possibility. Tunnel boring capacity does not seem to be an issue elsewhere in the M4-M5 Project and a works site is to be located at Darley Rd.

A similar thought arises between Iron Cove Bridge and the Railyard- a gently sloping bicycle tunnel from about Callan St to Lilyfield Rd near Justin St would provide a very easy alternative to Victoria Rd via Darling St.

Land Bridge at The Crescent

The proposed bicycle and pedestrian bridges and linking paths over The Crescent and City West Link are welcomed, as providing a good north-south link across the Rail Yards, connecting Lilyfield North and Rozelle to the Glebe foreshore and also to Annandale via the side bridge to the light rail station, assuming cyclists will be permitted to cross the railway at this point.

We are however against the proposed destruction of Buruwan Park and its trees and the apparent loss of the path from Railway Pde under the light rail bridge to The Crescent. We urge that this link be retained so cyclists using Brennan St and Whites Ck can continue to use the shared path to Johnston St next to the mural on The Crescent embankment. This is a

vital route to Bicentennial Park and Blackwattle Bay. It is unclear from the EIS if this path will remain or if bicycle access will be retained.

There appears to be step only access to the land bridge for cyclists coming from James Craig Drive (point 08 on fig 4.3, Rozelle Land Bridge). A ramp from a point to the NE of the land bridge would be far preferable.

The proposed side bridge to the light rail is shown as crossing The Crescent at point 02 in Fig 4.3 and then turning left to meet the light rail. It appears to us that it may be better to start from near point 06 and run directly across to the light rail from there. A ramp up from under the rail bridge (current entry to Buruwan Park off Railway Pde) to the proposed new bridge might then be possible.

As mentioned before, the path on the west side of The Crescent past the mural could continue across Johnston St and along the west side of The Crescent to a crossing point further south along The Crescent (linking with paths and Chapman Rd in the soon to be created, by City of Sydney Council, new parkland along The Crescent frontage).

The alternative route proposed in the EIS during construction up Bayview St to Johnston St is very steep, and a suitable contraflow bike lane would be needed on Johnston St for the reverse trip. We would hope that a path can be retained along The Crescent for as long as possible during construction.

Bridge to Whites Ck.

This bridge is also of value, providing a direct link from the Whites Creek corridor, across the railyard to the east-west cycleway in the railyard, with eventual links to Balmain and the Glebe Island Bridge. The design detail is not shown of where the ramp reaches ground level on Brenan St but cyclists from Leichhardt use Catherine St and Brenan St to reach Railway Pde. It would maximise utility if they could access the up-ramp to the bridge from a point west of Whites Creek, ie they wouldn't have to double back.

Removal of the existing footbridges over Victoria Rd and The Crescent.

The existing bridge at Lilyfield Rd is narrow and steep with poor access for cyclists but does provide essential access to the bus stops on Victoria Rd and to Robert St. Its retention or replacement is therefore requested for pedestrians, and for those cyclists preferring to use a direct crossing to get to Robert St rather than the proposed down ramp to Railyard level off the Victoria Rd road bridge. Use of this ramp, which is not well documented in the ATN (point 03 in Fig 4.4), would have to be around 150 m in length for 1:20 gradient, and would impose a lengthy detour on pedestrians and cyclists, in conjunction with another ramp back up on the other side of Victoria Rd. Design of this return link is also not specified and would introduce a possibly hazardous T intersection at the Anzac Bridge approach.

The second bridge, the relatively new "Beattie" Bridge, is also apparently to be demolished to make way for a new Anzac Bridge on-ramp. It is a wide well graded bridge but does have hazardous intersections with the paths at either end. If possible we would like to see

retention of this bridge and better connections built. The alternative route proposed (during construction and possibly afterward) via James Craig Drive is also hazardous, in particular due to the lack of a bike path in the section under the Anzac Bridge, where the carriageway is constrained, and the many heavy vehicles using this road. The path leading from James Craig Drive up to the Anzac Bridge is steep, with sharp bends, and has unprotected vertical spikes on the safety railing. The junction with fast moving bicycle traffic on Anzac Bridge cycleway near the Digger statue is also hazardous.

The Anzac Bridge approach path looks like it is being repositioned further north near Victoria Rd. An idea floated by the cycling community is to take this opportunity to raise the low point of the Anzac Bridge foot/cycleway approach. That is, elevate the cycleway to reduce the gradient and hence speeds. Ramps to and from the Railyard level paths should be constructed to avoid T intersections or turning traffic, ie by one way slip lanes with grade separation leading to or from Y junctions rather than T junctions.

Effects of Construction

The removal of the footbridges at Victoria Rd and the City West Link has been discussed above.

Detour via Bayview St and Johnston St when The Crescent land bridge is constructed.

This route is steep on Bayview St eastbound and would be awkward on Johnston St, involving a contra flow and a sharp turn into a footpath to connect with Bayview St in the opposite direction. It would not be needed if Buruwan Park was retained or at least a path retained next to the embankment.

Byrne St to Springside St detour.

This detour is proposed during construction of the tunnel portals near the Iron Cove Bridge. The proposed route is steep and is a lengthy detour. We would instead request that a route along Victoria Rd be maintained, at least for as long and as often as possible, even if it involves some extra signalling or Stop and Go personnel. An alternate route via Manning, Moodie and Waterloo Sts might be better, if possible, to link with the existing local bypass route on Belmore St or Red Lion St (one way pair) to Evans and Quirk St.

Pressure will mount on the old Iron Cove Bridge cycleway and the north side of Victoria Rd to avoid the construction. Improvements to the steep kerb ramps at Carey St in Drummoyne and awkward and rough ramp at Wellington St, amongst other problems, along the existing shared path should be identified and rectified.

Railings on the Anzac Bridge approaches.

The railings on the Anzac Bridge cycleway approach west of the Digger statue have uncapped spikes and need capping or replacing. The railings on the path, suggested as a detour for cyclists during construction, under the Anzac Bridge from James Craig Drive also have spikes, plus there are very rough stone pillars and planter boxes that should be replaced with more suitable path surrounds. This should be addressed as part of the Construction plan.

Conclusion

The Active Transport Strategy is a welcome step towards providing some community benefits, as part of the M4-M5 Link Project. However the ATS and ATN as formulated in the EIS are too limited as to what will be constructed by the Project, leaving too much to be done by other parties, with no funding or time lines. We believe some extra, agreed and funded, infrastructure can be included in the ATS. In particular the City West Cycle Link would seem ideally suitable, and the Victoria Rd cycleway through Rozelle. The Bedwin Bridge cycleway is of vital importance and the link to Cooks River should be achievable under existing developments by SW Metro and Urban Growth in the corridor.

Other links could well be included but further work will be needed to refine the overall plan and coordinate with other agencies such as Council and State authorities.

Consequently, we believe that there needs to be further consideration given to all the matters raised in this submission. That will entail further consultation between agencies and the community, including with local BNSW-affiliated Bicycle User Groups.

Neil Tonkin

IWBC Advocacy Coordinator

39 The Boulevarde

Lilyfield NSW 2040

Robert Moore

Vice President

Bike Leichhardt

62 Lamb St

Lilyfield NSW 2040

From: [REDACTED]
Sent: Mon, 16 Oct 2017 02:32:45 +0000
To: [REDACTED]
Subject: FW: Submission Details for Geordie McNabney (support)

From: system@acelo.com On Behalf Of Geordie McNabney
Sent: Monday, 16 October 2017 1:31:02 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [REDACTED]
Subject: Submission Details for Geordie McNabney (support)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Geordie McNabney
 [REDACTED]

Address:
 [REDACTED]

Camperdown, NSW
 2050

Content:

Living in Camperdown/Annandale, I feel like I'm right between these two projects (M4 East and new M5). Let me tell you why I believe the link between the two is essential.

Based on my observation of traffic levels that exist today, it's currently extremely difficult to travel in either direction at any time of the day due to congestion. King St Newtown to the south, and Parramatta Rd/City West Link to the west are absolutely bottlenecked whenever I try and travel west or south. Trucks and freight make up a part of it as well.

The problem as I see it is that there is a ridiculous and unnecessary combination of destination traffic (those who are intending to arrive in Newtown for example) and through traffic (those who currently need to pass through a suburb to get to their destination) trying to share the same section of road.

To me, the idea of being able to take through traffic out of the stop-start, existing terranean road network makes complete sense for two reasons.

Firstly, the existing bottlenecks like King St will thus be restricted to destination traffic. Imagine being able to simply drive to your destination and not have to compete for road space with airport traffic, south Sydney traffic, freight traffic travelling between ports, etc.

Secondly, from an environmental perspective, the impact of stop start traffic travelling on these existing networks vs funneling the through traffic onto a subterranean network that has no traffic lights and allows traffic to flow at higher speed with subsequently lower emissions makes a lot of sense.


The arguments against these sorts of projects usually revolve around choke points and environmental concerns. Regarding chokepoints, it's my view that these already exist. They're just currently crippled by both through traffic and destination traffic. Let's solve the problem by taking through traffic out of the

equation.

As for the environmental concerns, as outlined above I believe that smoother flowing traffic will produce far less emissions than the equivalent stopping and starting every 5 metres. Incidentally, I've often been stuck in exactly such traffic that's already passing schools, day cares etc. I'd rather some of this traffic be taken off the road and chimneyed into the atmosphere at higher altitudes than road/pedestrian level, than scare monger the govt into taking no action.

Furthermore, certainly the increase trend towards hybrid and electric cars should not be ignored. It would be ridiculous to seriously stifle the growth of our city due to concerns that will become irrelevant in ten years and beyond.

To summarise, for me, a sophisticated network of motorways that are connected by subterranean tunnels where sensible is not only a good idea, but is essential for a city like Sydney if it is to be considered a modern and cosmopolitan city on the world stage. The fact that it doesn't already exist is slightly embarrassing. This is true now, based on current traffic levels as outlined above. It will only be more so in the future as the population grows. I simply cannot think of any good reason not to proceed.


Submission: Online Submission from Geordie McNabney (support)
https://majorprojects.accelo.com/?action=view_activity&id=228076

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

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

From: [REDACTED]
Sent: Mon, 16 Oct 2017 02:43:58 +0000
To: [REDACTED]
Subject: FW: Submission Details for robin nagle (object)

From: system@accelo.com On Behalf Of robin nagle
Sent: Monday, 16 October 2017 1:42:02 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [REDACTED]
Subject: Submission Details for robin nagle (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: robin nagle
[REDACTED]

Address:
[REDACTED]

Annandale, NSW
2038

Content:

I strongly object to the further destruction of the inner west by this proposed connection of M4 M5 link of Westconnex. There are thousands of 100 year old houses built above the proposed tunnelling which will suffer significant deterioration by the impact of the drilling as evidenced by many houses built near any such traumatic construction. Our beautiful old streets surrounding the tunnels will become rat runs as motorists avoid this expensive new road. The proposed exhaust stacks alongside so many houses is an outrageous proposition - public health must be put before cars. Westconnex must be stopped before the inner west becomes a slum of overdevelopments with no amenities.

[REDACTED]
 Submission: Online Submission from robin nagle (object)
https://majorprojects.accelo.com/?action=view_activity&id=228082

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

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

From: [REDACTED]
Sent: Mon, 16 Oct 2017 02:53:40 +0000
To: [REDACTED]
Subject: FW: Submission Details for Amanda Wise (object)

From: system@acelo.com On Behalf Of Amanda Wise
Sent: Monday, 16 October 2017 1:53:05 PM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for Amanda Wise (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Amanda Wise
 [REDACTED]

Address:
 [REDACTED]

Haberfield, NSW
 2045

Content:

I am a local Haberfield resident. My home is impacted by both the first phase of Westconnex and the proposed M4/5 link. I am disgusted to see the potential impacts too on my children's school. I have two young children (6 and 8 years old) who will have the rest of their primary school lives impacted by construction noise, construction traffic (making the roads dangerous for us to walk to school) and pollution. I write as a member of the school P&C and make the following points:

- * It is not appropriate or 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

- * 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, which will have significant noise and air quality impacts for surrounding residences as well as students and staff of the school

- * The light vehicle and heavy vehicle traffic associated with Option B (including over 140 heavy vehicle movements per day) would 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

- * The proposal would lead to long term significant traffic impacts along Bland Street particularly light traffic movements going to and from the civil site entrance/exit on Bland Street, and likely loss of parking near the school due to construction vehicles parking along local roads

- * The dust associated with the demolition work on the Muirs sites followed by the tunnelling and spoil haulage activity will increase the risk of respiratory illness in our children

* 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 impact

* I also call for the ventilation stacks to be filtered. I note that when this stage is completed, the Haberfield stack will release toxic emissions from two sections of WestConnex over our community. I cannot understand why if the NSW government is spending billions of dollars on this project, it cannot afford to filter the stacks.

[REDACTED]
Submission: Online Submission from Amanda Wise (object)

https://majorprojects.accelo.com/?action=view_activity&id=228086

Submission for Job: #7485 WestConnex M4-M5 Link

https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

From: Amanda Wise <campaigns@good.do>
Sent: Monday, 16 October 2017 1:47 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.

I am particularly concerned about the impact to my neighbourhood in Haberfield, especially upon Haberfield Public School which my children attend. I object to the proposed 'Option B' (Bland St) for the construction phase of the project as I am worried about the effects this will have on the safety and amenity of the local school precinct with traffic in and out of the car park entrance on Bland Street. I am concerned about noise and pollution that will have a detrimental effect on my kids as they attend school.

In addition, I have grave concerns about this phase of the project further damaging Haberfield overall. Already there is a proposed entrance to/exit from the tunnel from Waratah St in Phase one – meaning major traffic impacts cutting through my once quiet street (I live just off Waratah Street). This new phase will only exacerbate that. Indeed, I would like for there to be no entrance left turn towards the tunnel, and no turn off the tunnel exit onto Waratah Street. It is unclear how the new M4/M5 link will interact with Waratah street Haberfield exit – if it does, this is something I would like addressed. The suburb has already been partly destroyed. Its great liveability is further compromised when traffic is fed right through the centre of a quite neighbourhood to feed out of area cars onto a major road.

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. Residents all over Sydney, experts, Councillors and even potential investors have all queried the information supplied by the Sydney Motorway Corporation and NSW Roads and Maritime Services. In this situation, it would be reckless and unprofessional of NSW Planning to rubber stamp this inadequate document.

The EIS states 'the detail of the design and construction approach is indicative only based on a concept design and is subject to detailed design and construction planning to be undertaken by the successful contractors.' The community will have no opportunity to comment on the Preferred Infrastructure Report which forms the basis of the approval conditions. Key decisions have been left open in this EIS. Not to allow consultation on the final choice of construction sites would further compromise an already inadequate consultation process.

SMC was required to consider alternatives. This section in the EIS is tokenistic at best. The City of Sydney came up with a well thought out alternative plan and this has been ignored in the EIS. The SMC should be required to engage with this plan and to respond to it. Any responsible system of governance would require that.

I completely reject the notion that unfiltered pollution stacks should be built anywhere in Sydney, let alone three or four in a single area. I am particularly concerned that schools would be near such unfiltered stacks.

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 am also very concerned about the impact of WestConnex on that residents and workers living near portals and on local roads which become even more congested as a result of WestConnex. There is research evidence that it is dangerous to live close to congested roads. I reject an approach to transport planning which allows a government authority to approve a project knowing that it will place some residents at more risk of life threatening impacts.

The noise and air quality studies are completely dependent on the accuracy of the traffic analysis and assumptions. If the traffic analysis is flawed, so too are the air and noise studies and local road traffic impacts. City of Sydney experts and other academic experts have already rejected the traffic analysis on which WestConnex bases its case. Only last week Citi financial analysts in a report to their large investors were of the view that the traffic predictions contained were unlikely to be achievable. They are arguing that due to toll avoidance and the opening of Badgery's Creek airport, the actual traffic figures will be lower than predicted. In this situation, it would be negligent for NSW Planning to approve this project.

I object to the indicative design for the Rozelle Interchange. Sydney Motorway Corporation has not been able to identify any other similar underground interchange project anywhere in the world or find a construction company to build it. This EIS should be rejected because it would be absurd to approve such a design concept without evidence that it could be constructed.

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.

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 inadequate traffic analysis shows that even if this tollway and all other proposed tollways are completed, the St Peters Interchange and Frederick Street in Ashfield will be considerably more congested in 2033 if the project goes ahead.

I am also concerned that the traffic figures relied upon in the EIS are simply not reliable. AECOM, the company responsible for this EIS, has a well-documented record of wrongly predicting traffic. Already there are reports that the traffic for all stages of WestConnex has been overestimated and construction costs underestimated. (SMH 'Pressure builds on government to sweeten WestConnex sale' 5/10/2017)

Reductions of volumes of traffic on Parramatta Rd, King Georges Road or the existing M5 are asserted but the model which projects these effects is not provided for scrutiny or independent assessment. The model's margin for error is not stated. The rest of the benefits all depend on the asserted traffic reductions generating improved travel times and better bus services or freight movement etc. So far the experience of the growth of traffic on Parramatta Rd in response to the re-imposition of tolls on the widened section of the M4 gives us leave to doubt these touted benefits.

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.

It was promised, and was a condition of the M4 East approval that in 2019, all Haberfield and Ashfield above ground WestConnex construction sites were to have been dismantled, as well the Urban Design and Landscape Plan (UDLP) completed and Legacy Project 'surplus lands and property' delivered back to the community. These promises were still being reiterated in early 2017, when there was community consultation on how surplus land would be restored to the community in 2019. It is a matter of grave concern that these promises are now been ignored as if they did not happen. NSW Planning should investigate this situation.

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

The EIS identifies a significant risk of leaks of contaminated water into Rozelle Bay and Alexandria Canal. Such risks to health of Sydney's waterways is not acceptable to me. The Sydney Motorway Corporation through its conduct at St Peters has shown that it cannot be trusted to manage contamination risks. I am completely opposed to the residents of St Peters being exposed to a high risk of being impacted by gases from exposed landfill for a further three years. The NSW EPA should not grant any further licenses that would allow such events to occur.

I object to the EIS on the grounds that it fails the Secretary's requirement for "meaningful" consultation. Hundreds of 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'.

There heritage report ignores potential impacts on hundreds of homes in Newtown and Rozelle which are part of Sydney's valued history. This report is incomplete and should not be accepted.

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, Amanda Wise 1 Dudley St, Haberfield NSW 2045, Australia

This email was sent by Amanda 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 Amanda provided an email address (amanda.wise@mq.edu.au) which we included in the REPLY-TO field.

Please reply to Amanda Wise at amanda.wise@mq.edu.au.

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

From: [REDACTED]
Sent: Mon, 16 Oct 2017 02:56:42 +0000
To: [REDACTED]
Subject: FW: Submission Details for company BP Australia Pty Ltd (org_comments)
Attachments: 228084_M4_M5 Link EIS Submission October 2017_2017Oct16_1350.pdf

From: system@acelo.com On Behalf Of BP Australia Pty Ltd Company
Sent: Monday, 16 October 2017 1:51:13 PM (UTC+10:00) Canberra, Melbourne, Sydney
[REDACTED]
Subject: Submission Details for company BP Australia Pty Ltd (org_comments)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: BP Australia Pty Ltd Company
Organisation: BP Australia Pty Ltd (Network Development Manager)
Govt. Agency: No
[REDACTED]

Address:
[REDACTED]

Guildford, NSW
2161

Content:
Submission uploaded.

[REDACTED]
Submission: Online Submission from company BP Australia Pty Ltd (org_comments)
https://majorprojects.acelo.com/?action=view_activity&id=228084

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

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



Joanne Harvey

Network Development Manager
BP Australia Pty Ltd

BP Australia Pty Ltd
ABN 53 004 085 616

Level 17, 717 Bourke Street
Docklands VIC 3008
Australia

Switchboard: +61 3 9268 4111
www.bp.com.au

16 October 2017

Department of Planning and Environment
Attn: Director, Transport Assessments
GPO Box 39
Sydney NSW 2001

Dear Sir/Madam

Re: Submission to WestConnex M4-M5 Link Major Project Assessment

BP Australia Pty Ltd (BP) is the owner and operator of numerous service stations in the Sydney metropolitan area. BP has undertaken a review of the EIS for the M4-M5 Link (the Proposal) and notes that some BP sites are likely to be affected. The major points BP wishes to make in this submission are in regard to the construction stages of the project. There are two themes to the concerns: (1) advance notice of surface level roadworks which may affect trade; and (2) tunnelling/settlement and ensuring fuel tank integrity.

Reasonable Notice of surface roadworks with potential to affect passing trade

The EIS indicates that surface works will at times result in temporary lane closures and thus traffic flow changes in Victoria Road Rozelle (near BP Rozelle), Wattle St Haberfield/Parramatta Rd Ashfield (near BP Ashfield). There also seems to be potential for traffic flows on Princes Highway to be affected by works at/near Sydenham Interchange (near BP Sydenham and BP St Peters). As an affected stakeholder (ie business dependency on passing traffic), it is reasonable that BP be given advance notice about the particulars and timing of construction stage works on major roads near BP sites. BP requests that conditions of consent be included that requires adequate notice be given to potentially affected businesses of construction stage works. It is suggested that this be included in a required stakeholder communication plan. As a large organisation, if communication is to be effective it is important that the proponents make contact with an appropriate person at BP. The contact person for liaison with BP on the Proposal is:

Joanne Harvey

Network Development Manager
BP Australia Pty Ltd
132 McCredie Road, Guildford NSW 2161
Email: Joanne.Harvey@se1.bp.com
Mobile: +61 420 312 501

BP of course requests that access to all its properties be maintained during construction works.

Tunnelling Works and the Integrity of Fuel Storage Tanks

Both underground and aboveground fuel storage tanks warrant special attention when major tunnelling activities are to be undertaken. There is an essential objective, of course, that the integrity of the fuel system not be prejudiced whatsoever with this tunnelling work. BP has had recent experience with the tunnelling associated with the New M5 project (this tunnel is located directly underneath BP Sydenham). There was a need to draw in appropriate expertise at an early stage of the planning to ensure that risks were minimised. In regard to the Proposal, we note that:

- The M4-M5 Link tunnelling would occur within some 30m of BP St Peters, and there is a lack of clarity on the tunnel vertical alignments here and whether adequate depths will be available below the service station site if the nearby Sydenham Interchange would be at natural surface level or above.
- The stubs for the Western Harbour Tunnel and Beaches Link runs close to directly under BP Rozelle (Ellen St).

We request that BP again be contacted early in the design stages to ensure that any risk to fuel tank integrity is managed appropriately. Our contact person is nominated above.

Summary and Conclusion

BP wishes to be recognised as a concerned stakeholder in regard to the Proposal and a willing partner in connecting any approval with construction stage works to help minimise adverse environmental or trading effects, in this regard BP requests conditions be imposed to ensure:

1. Advanced notice of works with potential to affect passing traffic flows to its sites be given to BP, and requests to be invited to participate in the preparation of construction-related management plans.
2. The proponents be required to seek concurrence from BP before any tunnelling design and construct contracts are finalised in the vicinity of BP sites to minimise the risks of environmental harm.

Access to all BP properties be maintained during construction works.

Yours sincerely
BP AUSTRALIA PTY LTD



Joanne Harvey
Network Development Manager

From: [REDACTED]
Sent: Mon, 16 Oct 2017 03:13:50 +0000
To: [REDACTED]
Subject: FW: Submission Details for Christopher Standen (object)
Attachments: 228092_M4-M5 EIS Submission_2017Oct16_1412.pdf

From: system@accelo.com On Behalf Of Christopher Standen
Sent: Monday, 16 October 2017 2:13:12 PM (UTC+10:00) Canberra, Melbourne, Sydney
[REDACTED]
Subject: Submission Details for Christopher Standen (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Christopher Standen
[REDACTED]

Address:
[REDACTED]

Erskineville, NSW
2043

Content:
See attachment.

[REDACTED]
Submission: Online Submission from Christopher Standen (object)
https://majorprojects.accelo.com/?action=view_activity&id=228092

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

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

Submission on:

WestConnex M4-M5 Link Environmental Impact Statement

Submitted by: Christopher Standen

Date: 12 October 2017

About the author

PhD candidate in transport planning and economics at The University of Sydney. Areas of expertise include transport/land use planning and policy, traffic modelling and forecasting, discrete choice analysis, infrastructure assessment, and geospatial analysis (GIS).

Author/co-author of several publications in the transport and health literature. Reviewer for Research in Transportation Economics, the Journal of Transport and Health, and the Australasian Transport Research Forum. Regularly published and quoted in the media.

Summary

I strongly object to the proposal in its entirety and urge the Secretary of Planning to advise the Minister to refuse the application on the grounds below.

- 1. The planning process has been corrupted to allow this scheme to proceed against the public interest.**
- 2. The social and environmental impacts described in the EIS are unacceptable, and far outweigh any benefits of the project. Because of flaws and uncertainties in the modelling, the actual impacts are likely to be much greater than those forecast.**
- 3. There are major issues with the Traffic and Transport Report. There is insufficient information about the modelling inputs, assumptions and methodology for the forecasts to be independently verified. There is no sensitivity analysis of key assumptions.**
- 4. Many of the project objectives, such as congestion management, could be met through better management of demand on the existing road network, e.g., through reform of road pricing. The M4-M5 corridor already has an extensive and high-capacity road network; there is just too much demand at present for it to operate efficiently. History tells us that adding more capacity will not lessen this demand; it will only serve to increase it.**
- 5. The project makes little sense from a transport planning and policy perspective. The role of motorways in a multimodal transport system is to move traffic around densely populated**

areas. For radial transport into and out of urban centres, mass transit is more efficient and economical, and has less impact on the human population.

6. The M4-M5 Link will be used by less than 1% of the NSW population each day. The rest of the population will pay dearly in terms of increased traffic impacts, poorer air quality, and state and federal funds being diverted from worthwhile causes.
7. The project has a high financial risk. The flaws and optimistic assumptions in the traffic modelling mean that toll revenue is likely to be significantly lower than forecast. AECOM has a history of producing over-optimistic traffic forecasts for toll roads, resulting in previous financial failures (e.g., Clem7).

1 Corruption of the planning process

The proposal for the M4-M5 Link and the wider WestConnex scheme did not originate from skilled/qualified transport planners and engineers, with an objective of improving access and mobility for Sydney's growing population and freight task.

Rather, the proposal originated from some already-wealthy directors and shareholders of private corporations, whose sole objective was to increase revenues and profits through the expansion of Sydney's toll road network.

The proposal was supported by the Commonwealth and NSW Governments - no doubt as payback for the large donations these corporations make to both the Liberal and Labor parties.

It was shoehorned rather crudely into the 2012 NSW Long Term Transport Master Plan. Objectives were drafted retrospectively to try to justify the scheme. In a thorough and uncorrupted planning process, objectives are decided first, in consultation with the community/stakeholders; then, alternative proposals for meeting those objectives are developed and appraised.

The Commonwealth and NSW Governments committed billions of dollars of public funds to this private enterprise before any business case was developed. This included proceeds from the sale of high-value public assets (ports and electricity network). Despite public subsidies of \$5.6 billion to date, the scheme will still not be able to pay for itself through user charges (tolls). Therefore, to cross-subsidise the scheme, tolls have been/will be introduced on existing, publicly-owned motorways (M4 and M5 East), and will be extended on the M5 Southwest after 2026, when this motorway had been due to revert to public ownership. Effectively, the M4, M5 East and M5 West are being privatised to subsidise this private toll road. Given the optimistic traffic/revenue forecasts, and probable increases in construction costs, further substantial public subsidies are likely to be required.

The NSW Government legislated changes to the Environmental Planning and Assessment Act 1979, to ensure decisions to grant planning approvals for this scheme could not be challenged in the courts. It also introduced legislation to subdue peaceful community opposition.

The Environmental Impact Statements for all stages of WestConnex, including that for the M4-M5 Link, have clearly been manipulated to overstate the benefits and understate the impacts.

Will the scheme meet its principle objective of increasing corporate revenues and profits? I believe so. Various construction companies, banks and consulting firms have already been awarded lucrative contracts. In terms of operation, there is still significant risk around future traffic forecasts (toll

revenue) and construction costs. However, all financial risk is at present being borne by the taxpayer, as Sydney Motorways Corporation is yet to be sold. I expect a future private operator will acquire it at a fire-sale price when traffic volumes are established, then sit back and enjoy the guaranteed 4% annual increase in toll charges.

Clearly, WestConnex is a rort, designed to enrich a few already-wealthy individuals. But this is not small-scale fraud, like overstating expenses on one's tax return, or claiming a few private expenses on a work trip. This scheme involves a massive diversion of public funds to a private enterprise, which could otherwise have been used for worthwhile infrastructure with long-term benefits for NSW. It will have a massive impact on people's lives. Construction will cause years of disruption to sleep and travel. The new tolls on existing motorways (M5 East, M5 Southwest and M4) will disproportionately affect lower-income households. The extra traffic generated through induced demand and toll-avoidance will lead to more road trauma, more traffic noise (sleep loss), and more air pollution (see next section).

If this project is approved and built, more people will become sick and will die from air pollution. More people will lose sleep through traffic noise. More people will be killed and injured in road crashes.

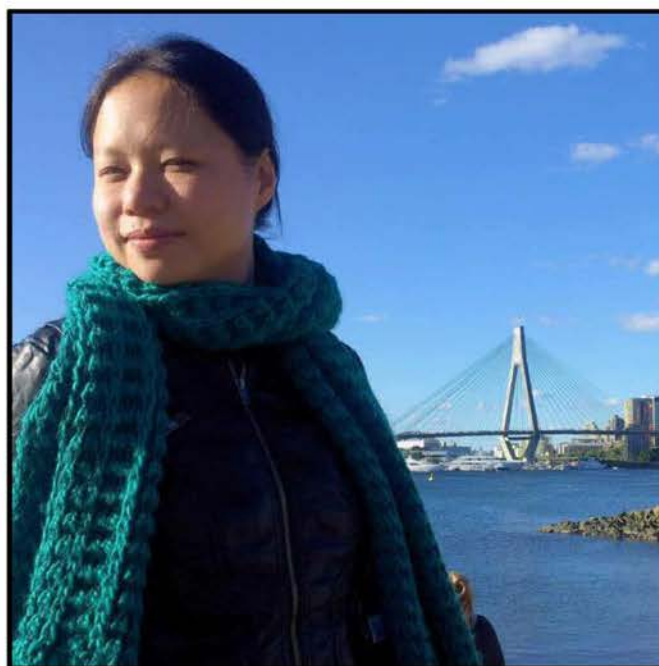
If YOU side with the corporations and approve this scheme - and ignore the warnings and issues raised by the community, transport experts, health experts and other stakeholders - YOU will be jointly responsible for this additional loss of life and suffering. YOU will be acting unethically, and against the public interest.

2 More deaths and disease from air pollution

Below is a photograph of my late friend, Natasha Allison. In November 2014, she developed a cough. Two months later, she died from lung cancer. She was still young and didn't smoke.

We do not know what caused her cancer, but there is clear evidence that lung cancer risk increases with increasing exposure to the petrochemical toxins in petrol and diesel exhaust. According to the World Health Organisation, diesel exhaust is a carcinogen in the same class as asbestos, arsenic and mustard gas. Invisible and odourless petrochemical particulates penetrate deep into our lungs and into our blood supply and cells while we work/play/exercise/sleep - and we may only become aware of the health consequences years later. Children are particularly vulnerable while their lungs are still developing.

There is no safe level of air pollution – the higher the level, the more people it will kill, and the more people will develop chronic lung and heart disease. And it could be any one of us, or any of our loved ones, next.



Which brings me to my baby daughter, Hanna Eveline, who was born four months ago (photograph below). In recent months, the Office of Environment and Heritage has issued frequent alerts warning of poor regional air quality in Sydney Central-East. When we walk along the local streets in our neighbourhood (e.g., Mitchell Rd, Sydney Park Rd, King St, Euston Rd), we are constantly being gassed by plumes of carcinogenic diesel smoke from trucks and other vehicles. While I can hold my breath, Hanna is completely defenceless. Like all children, she is particularly vulnerable to air pollution while her lungs are developing.



Governments overseas are taking steps to protect people from harmful diesel/petrol emissions, for example, by reducing traffic volumes in populated areas.

However, WestConnex and the associated road-widening works (e.g., Euston Rd, Campbell Road) will bring more traffic into some of the most densely populated parts of Sydney. Furthermore, the tolls being introduced/extended on the existing M4, M5 East and M5 Southwest motorways will encourage thousands of car and truck drivers to switch to suburban/residential streets (e.g., Stony Creek Rd and Parramatta Rd).

Regional, local, and roadside air pollution levels are already unacceptably high, and all this extra traffic will make it worse. If YOU approve this project, it is certain more people will die and suffer chronic illness in future decades as a result of this additional traffic and petrochemical exhaust – not

to mention the increase in road trauma. I hope Hanna does not become a victim of YOUR decision to approve this increase in traffic volumes and air toxin levels.

3 General issues with EIS, M4-M5 Link and WestConnex

- 1) The proposed M4-M5 Link and broader WestConnex scheme are not in the public interest.
 - a. Any personal travel time savings generated by the project will not benefit the economy, and will be cancelled out in time by induced demand and induced sprawl.
 - b. The M4-M5 Link will be used by less than one percent of the NSW population each day. The costs will be borne by the whole population.
 - c. The project will cause immense social harm. It will destroy established communities. It will cause an increase in air pollution-related deaths and illnesses.
 - d. There are numerous ways of spending \$16.8 billion that would deliver a much greater social and economic benefit, and would not cause so much harm and destruction.
- 2) The EIS authors have not modelled or objectively assessed alternative policy options that could meet the transport/accessibility/freight needs of NSW's growing population (individually or in combination), e.g.,
 - a. Greater investment in mass/public transport;
 - b. Demand management/road pricing reform;
 - c. Land use planning that places homes, employment and services closer together.
- 3) Given the major flaws with the Traffic and Transport Report, there can be no confidence in the accuracy of the other impact analyses in the EIS that are dependent on the traffic forecasts, in particular:
 - a. Air quality,
 - b. Noise and vibration,
 - c. Human health,
 - d. Greenhouse gases.
- 4) The EIS does not consider the cumulative costs and impacts of adding more urban motorways to those previously built through the heart of Sydney since the 1950s. Although the economic, social and environmental costs of each individual motorway (as reported in an EIS) may be considered by some stakeholders to be acceptable, the cumulative costs of continued urban motorways are considerable:

Following decades of road expansion and consequential sprawl, Sydney now spends about 13% of its GDP on transport, while the average European or Asian city spends only between 5% and 8%.¹

- a. Serious human health impacts due to petrochemical vehicle emissions/smog, including:
 - i. Lung and heart disease, and

- ii. Impaired lung and nervous system development in children living near motorways/exhaust stacks.
- b. Waterways contaminated with road runoff (heavy metals in brake and clutch dust, exhaust particulates, etc.).
- c. High road trauma costs (deaths/injuries and material damage).
- d. Urban sprawl and increasing commuting distances.
- e. Social isolation for non-drivers living in car-dependent suburbs.
- f. Increasing numbers of people losing sleep due to traffic noise.
- g. Impacts on visual amenity (pollution stacks, concrete interchanges, concrete flyovers).
- h. Extreme summer temperatures (urban heat island effect).
- i. Community destruction and severance.
- j. Destruction of heritage areas/buildings.
- k. Irreversible biodiversity loss.
- l. Less incidental physical activity from walking and bicycling (including to/from public transport), resulting in higher rates of diabetes, cancer and heart disease.
- m. Increased chauffeuring burdens for parents and carers.
- n. Less independence for children.
- o. High per-capita greenhouse gas emissions.

4 Issues with the Traffic and Transport Report (Appendix H)

4.1 General issues

- 5) There is not enough information about the methodology, input data or assumptions for the forecasts to be independently verified.
- 6) There is no sensitivity analysis in the Traffic and Transport Assessment. The effects of varying key assumptions (e.g., willingness to pay the tolls) have not been described.
- 7) The travel time calculations do not appear to include delays at on-ramps and off-ramps. The Business Case states that ramp metering will be used. This will cause delays for travellers entering/exiting the M4-M5 Link; these delays have not been included in the Traffic and Transport Report.
- 8) Travel time and accessibility impacts for non-motorised modes (walk and bicycle) have not been modelled or objectively assessed.
- 9) Impacts of disruptive technologies on future driving demand have not been considered (e.g., automated vehicles).
- 10) Inter-generational changes in vehicle ownership, driver licensing and transport preferences have not been considered.
- 11) Changes in aggregate measures have not been provided, i.e.:
 1. Overall increase in VKT.
 2. Change in average trip distance.
 3. Change in average trip duration.
 4. Change in total travel time.

4.2 Assessment methodology

- 12) There is not enough information about the modelling methodology for it to be replicated and the outputs independently verified.
- 13) The transport model (WRTM) has not been made available for independent verification.
 - a. The model input data and assumptions have not been made available for independent verification.
- 14) Insufficient detail on the Value of Travel Time Saving (VTTS)/Willingness to Pay (WTP) model:
 - a. What are the form and parameters of the model?
 - b. If it was based on stated preference surveys, how has the issue of hypothetical bias been addressed?
 - c. Has the model been validated? Previous toll choice models in Australia have overestimated WTP for toll roads.

- d. Does the model include the negative utility of the tunnel environment (monotony, no natural light, poor air quality)?
 - e. What value of WTP has been used in the WRTM?
 - f. What is the 95% confidence interval around the WTP value used?
 - g. Does the WTP estimate take into account tolls that motorists currently pay (toll saturation)?
E.g., a road user may be willing to pay an additional \$10/day if he/she currently pays nothing, but not willing to pay an additional \$10 if he/she is already spending \$15 on tolls.
- 15) Why has the weekend period not been modelled, when current weekend traffic volumes are higher than weekday traffic volumes on some parts of the network?
- 16) Insufficient information about the travel zone structure in the WRTM:
- 1. What are the travel zones based on? How big are they?
 - 2. How are intra-zonal trips modelled?
 - 3. How are trips to/from external zones modelled?
- 17) Induced demand has not been adequately addressed:
- 1. The model ignores the impact of the project on the long-term transport decisions of individuals and firms, including:
 - (1) Residential location choice – the project will encourage more people to move further from work (sprawl), thereby increasing average travel distances/demand.
 - (2) Work location choice – the project will encourage more people to work further from home, thereby increasing average travel distances/demand.
 - (3) Car ownership choice – the project will encourage more car ownership and use.
 - 2. To my knowledge, there has been no long-term evaluation/verification of the methodology used to forecast induced demand. Induced demand by its nature materialises over several years, as people gradually move home/work location etc. Without a long-term evaluation/verification of the methodology, there can be no confidence in the induced demand forecast produced.
- 18) Insufficient detail on origin-destination demand matrix generation:
- 1. What are the form and parameters of the generalised cost function?
 - 2. How were shortest paths calculated?
- 19) Insufficient detail on trip generation:
- 1. What are the form and parameters of the trip production function, and how was it estimated?
 - 2. What are the form and parameters of the trip attraction function, and how was it estimated?

3. How were trip productions and trip attractions balanced?
- 20) Insufficient detail on trip distribution/modal split:
1. What are the form and parameters of the gravity model used?
 2. What are the form and parameters of the deterrence function used?
 3. How has modal split been estimated?
- 21) Insufficient detail on road traffic assignment:
1. Is assignment stochastic or deterministic?
 2. What link loading/flow function was used? What parameters were chosen?
 3. Were intersection delays included? How?
- 22) Insufficient detail on public transport assignment:
1. How were access and egress points determined?
 2. How were route strategies determined?
- 23) Non-motorised trips were not included in the WRTM or intersection modelling.
- 24) Impacts on accessibility have not been modelled/assessed.
1. Most transport is not an end in itself - it is a means to access work, education, services etc.
How does the project affect accessibility?
- 25) Equity and equality impacts not described.
1. How many people will have better accessibility with the project?
 2. How many people will have poorer accessibility with the project?
 3. Do benefits/impacts accrue to any population groups more than others, e.g., people with a disability or on low incomes?
- 26) Downs-Thomson Paradox not considered:
1. The project will attract passengers away from public transport to driving. As such, public transport patronage may be lower than it would be without the project. This could result in public transport service levels being cut, encouraging further mode shift from public transport to road.
- 27) No sensitivity analysis.
1. Given the numerous assumptions and approximations in the model, there needs to be some sensitivity analysis, e.g.,
 - i) How will traffic volumes be affected if/when the WTP for the toll turns out to be lower than the point estimate used?

5 References

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

From: [REDACTED]
Sent: Mon, 16 Oct 2017 03:23:56 +0000
To: [REDACTED]
Subject: FW: Submission Details for Rachael Blackwell (object)

From: system@acelo.com On Behalf Of Rachael Blackwell
Sent: Monday, 16 October 2017 2:22:07 PM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for Rachael Blackwell (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Rachael Blackwell
 [REDACTED]

Address:
 [REDACTED]

Rozelle, NSW
 2039

Content:

I am writing to state my objection to the proposed unfiltered ventilations shafts in Rozelle and Lilyfield and to outline my concerns regarding the Westconnex M4-M5 link.

I am very concerned about air pollution, noise and vibration during the construction phase of the project. The tunneling is proposed to be 24 hrs a day seven days a week. My 3 children attend Rozelle Public School and live on Waterloo Street. I can't imagine how awful it will be for them living and learning in these conditions for the duration of the project.

I am very concerned about the proximity of the construction site to local schools and childcare centres. Children are more susceptible to the negative impacts of pollution and noise.

I object to the impact on our local streets during and after construction. Waterloo Street is already a rat run for people trying to avoid Victoria Rd. This will only be made worse with lane closures during Westconnex. Development of Balmain Leagues club was rejected by Council, JRPP the Dept of Planning and the Land and Environment Court because of the unacceptable impact on traffic and local roads during and after construction. Why is it now acceptable for Westconnex?

I am concerned that Westconnex cannot/ are unwilling to provide assurances that my property will not be damaged by tunneling underneath it.

I strongly object to the idea that my children might not be able to get adequate rest and will be exposed to a stressful environment for the duration of the construction phase. This could affect their physical and mental health

I'm concerned that no consideration has been given to road safety of kids crossing to get to school during the construction phase. Victoria Road is already a very dangerous area for pedestrians. Provision of a

footbridge should be considered while construction is taking place.

It is imperative that the iron cove link remains toll free. Pushing traffic onto already overcrowded local streets is completely unacceptable.

I object to the usage of the unfiltered ventilation shafts. I believe these should be filtered and I can't understand why this hasn't been considered already. Pollution levels on Victoria Road already exceed the legal limit on a regular basis.

I object to the loss of our green spaces and leisure facilities during and possibly after construction. Our family alone regularly cycles, runs and walks around the Iron Cove bay. In addition to this we utilise King George Oval for Little Athletics and school sporting events and Drummoyne Pool for swimming.

It seems to me that public transport hasn't really been considered as a viable solution. I'm concerned that the traffic modeling is woefully inaccurate and that as these plans are subject to change upon sale of the project.


Submission: Online Submission from Rachael Blackwell (object)
https://majorprojects.accelo.com/?action=view_activity&id=228096

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

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

From: [REDACTED]
Sent: Sun, 15 Oct 2017 13:52:36 +0000
To: [REDACTED]
Subject: FW: Submission Details for Janette Willett (object)
Attachments: 227828_JW EIS Objection_2017Oct15_2247.pdf

From: system@accelo.com On Behalf Of Janette Willett
Sent: Sunday, 15 October 2017 10:48:13 PM (UTC+10:00) Canberra, Melbourne, Sydney
[REDACTED]
Subject: Submission Details for Janette Willett (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Janette Willett
[REDACTED]

Address:
[REDACTED]

Rozelle, NSW
2039

Content:
My submission is attached

[REDACTED]
Submission: Online Submission from Janette Willett (object)
https://majorprojects.accelo.com/?action=view_activity&id=227828

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

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

Janette Willett
28 Callan Street, 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 18 years at our home at 28 Callan Street. I also own a house at 9 Park Street where my mother-in-law has lived for over 10 years. Rozelle represents the best of Australian communities: people care and support each other and are passionate about protecting the unique qualities of a vibrant village. The proposal identified in the EIS threatens the very fabric of our community and puts the health and safety of thousands of people at risk.

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.

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 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 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,

Janette Willett

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <i>Janette Willett</i>	
Application Number: SSI 7485	Address: <i>28 Callan St.</i> Suburb: <i>Rozelle</i> Postcode <i>2039</i>	
Application Name: WestConnex M4-M5 Link	Signature: <i>J Willett</i>	
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:

1. 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)
2. I am appalled to read in the EIS that more than 100 homes across the Rozelle construction sites will be severely affected by construction noise for months or even years at a time. This would include hundreds of individual residents including young children, school students and people who spend time at home during the day. The predicted levels are more than 75 decibels and high enough to produce damage over an eight hour period. Such noise levels will severely impact on the health, capacity to work and quality of life of residents. NSW Planning should not give approval to a project that could cause such impacts. Promises of potential mitigation are not enough, especially when you consider the ongoing unacceptable noise in Haberfield during the M4East construction.
3. 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.
4. 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.
5. 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.
6. The volume of extra heavy traffic in the Rozelle area and the acknowledged impact this will have on local roads is completely unacceptable to me.
7. The EIS states that 'a preferred noise mitigation option' would be determined during 'detailed design'. This is unacceptable and residents have no opportunity to comment on the detailed designs. The failure to include this detail means that residents have no idea as to what is planned and cannot comment or input into those plans. (Executive Summary xvi)

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Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <i>Janette Willett</i>	
Application Number: SSI 7485	Address: <i>28 Callan St</i> Suburb: <i>Rozelle</i> Postcode <i>2039</i>	
Application Name: WestConnex M4-M5 Link	Signature: <i>JM Willett</i>	
Please include my personal information when publishing this submission to your website Declaration : I HAVE NOT made any reportable political donations in the last 2 years.		

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

- a. 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.
- b. The EIS refers to be construction impacts as being 'temporary'. I do not consider a five year construction period to be temporary.
- c. It is outrageous to suggest that four unfiltered stacks would be built in one area in Rozelle
- d. The EIS states that property damage due to ground movement may occur. We object to the project in its entirety on this basis. The EIS states that 'settlement, induced by tunnel excavation, and groundwater drawdown, may occur in some areas along the tunnel alignment'. The risk of ground movement is lessened where tunnelling is more than 35 metres. However, some tunnelling is at less than 10 metres. This proposed tunnel alignment creates an unacceptable risk of ground movement. In addition, the EIS states that there are a number of discrete areas to the north and northwest of the Rozelle Rail Yards, to the north of Campbell Road at St Peters and in the vicinity of Lord Street at Newtown where ground water movement above 20 milliliters is predicted 'strict limits on the degree of settlement permitted would be imposed on the project" and 'damage' would be rectified at no cost to the owner. would be placed (Executive Summary, xvii -iii). The project should not be permitted to be delivered in such a way that there is a known risk to property damage that cannot be mitigated to an acceptable level of risk.
- e. 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.
- f. I am completely opposed to approving a project in which the Air quality experts recommend rather than filtrating stacks extra stacks could be added later.
- g. I do not consider it acceptable that cycling/pedestrian routes should be changed for four years in Annandale and Rozelle in ways that will make cycling more difficult and walking less possible for residents with reduced mobility. These are vital community transport routes.

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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: Janette Willett

Signature: J Willett

Please include / delete (cross out or circle) my personal information when publishing this submission to your website Declaration : I **HAVE NOT** made any reportable political donations in the last 2 years.

Address: 28 CALLAN 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

Application Name: WestConnex M4-M5 Link

- 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.
- 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.
- 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.
- I completely reject this EIS due to its failure to consider the alternative plan put forward by the City of Sydney.
- 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.
- 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.
- Why is there no detailed information about the so called 'King Street Gateway' included in the EIS

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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: Janette Willett
Signature: Janette Willett 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: 28 Callan St
Suburb: Rozelle Postcode 2039

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

- Rozelle Rail Yards and Rozelle Civil Site. It is clear that the most highly affected area of Stage 3 will be the Rozelle area and the massive and hugely complex Rozelle interchange. The suggestion that Westconnex is capable of building this is highly questionable. Nothing like this has been built anywhere else in the World. Considering the simple problems of dust management, noxious gasses and the handling of toxic materials like asbestos that have been so inappropriately dealt with on Stages 1 and 2 by Westconnex this intersection of Stage 3 is a disaster waiting to happen and should definitely not be allowed to proceed without a massive investigation. What has been shown in the EIS is totally inadequate for this project to be allowed to proceed.
- Human health risk (Executive Summary xvi) - The EIS states that there may be a 'small increase in pollutant concentrations' near surface roads. The EIS states that potential health impacts associated with changes in air quality (specifically nitrogen dioxide and particulates) within the local community have been assessed and are considered to be 'acceptable.' We disagree that the impacts on human health are acceptable and object to the project in its entirety because of these impacts.
- Truck routes – Leichhardt: No trucks should be permitted on Darley Road or local roads in Leichhardt or Lilyfield. The EIS proposes that all trucks will arrive at the Darley Road civil and tunnel site from Haberfield and travel along Darley Road to the site, with a right-hand turn now permitted into James Street. The proposed route will result in a truck every 3-4 minutes for 5 years running directly by the small houses on Darley Road. These homes will not be habitable during the five-year construction period due to the unacceptable noise impacts. The truck noise will be worsened by their need to travel up a steep hill to return to the City West Link, so the noise impacts will affect not just those homes on or immediately adjacent to Darley Road. The proposal to run trucks so close to homes is dangerous and there have been two fatalities on Darley Road at the proposed site location. The EIS does not propose any noise or safety barriers to address this. Despite the unacceptable impact to nearby homes, there is no proposal for noise walls, nor any mitigation to individual homes.
- At the western end of Bignell Lane near Pyrmont Bridge Road existing flood depth was identified up to one metre in the 100 year ARI. The NSW Government Floodplain Development Manual (2005) identifies this location as a high flood hazard area.

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <i>Janette Willett</i> Address: <i>28 Callan St</i>
Application Number: SSI 7485	Suburb: <i>Rozelle</i> Postcode <i>2039</i>
Application Name: WestConnex M4-M5 Link	Signature: <i>J Willett</i>
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 object to the proposal to the Darley Road civil and tunnel site for the reasons set out in this submission.
2. I object because of the unacceptable risk it will create to the safety of our community. Darley Road is a known accident and traffic blackspot and the movements of hundreds of trucks a day will create an unacceptable risk of accidents. On Transport for NSW's own figures, the intersection at the City West Link and James Street is the third most dangerous in the inner west.
3. The EIS permits trucks to access local roads in exceptional circumstances which includes queuing at the site. Given the constraints of the Darley Road site queuing will be the usual situation. The EIS needs to be amended to remove queuing as an exceptional circumstance. The truck movements should properly managed by the contractor so that there is no queuing. This exception will make it easier for contractors to neglect their obligation to monitor and manage truck movements in and out of the site and needs to be removed. The EIS needs to specifically provide that all local streets abutting Darley Road and expressly prohibited truck movements (including parking) on these streets. This should include all streets from the north (James St) to the south (Falls Road), which are near the project footprint.
4. Leichhardt residents were repeatedly told by SMC that the Darley Road site would be operational for three years. The EIS states that it will be operational for 5 years. This creates an unacceptable impact for residents. The works on the site should be restricted to a three-year program as was promised.
5. The EIS states that construction noise levels would exceed the relevant goals without additional mitigation. The additional mitigation is mentioned but not proposed or any detail provided. 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. 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 unlivable during this period. In addition, the planned 170 heavy and light vehicles will considerably worsen the impact of construction noise.
6. The EIS does not even mention the impact of aircraft noise and its cumulative impact. As such, the noise levels identified are misleading. I object to the selection of the Darley Road site because of the unacceptable noise impacts it will have on surrounding homes and businesses.

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Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <i>Janette Willett</i>	
	Address: <i>28 Callan St</i>	
Application Number: SSI 7485	Suburb: <i>Rozelle</i>	Postcode <i>2039</i>
Application Name: WestConnex M4-M5 Link	Signature: <i>JM Willett</i>	
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:

1. 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
2. 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.
3. 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.
4. 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.
5. 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.
6. 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.
7. 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.

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<p>Attention Director 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>Janette Willett</u></p> <p>Signature: <u>JW Willett</u></p> <p>Please <u>include</u> delete (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: <u>28 Cahoon St</u></p> <p>Suburb: <u>Rozelle</u> Postcode <u>2039</u></p>
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I object to the WestConnex M4-M5 Link proposals for the following reasons:

1. 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.
2. The process that has led to this EIS has been undemocratic and obscure, driven by decisions made behind closed doors.
3. 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.
4. 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.
5. 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.
6. 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 ?
7. 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.
8. 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.
9. 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?
10. 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).

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Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <i>Janette Willett</i>
	Address: <i>28 Callan St</i>
Application Number: SSI 7485	Suburb: <i>Rozelle</i> Postcode <i>2039</i>
Application Name: WestConnex M4-M5 Link	Signature: <i>JM Willett</i>
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)

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Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <i>Janette Willett</i>
	Address: <i>28 Callan St</i>
Application Number: SSI 7485	Suburb: <i>Rordale</i> Postcode <i>2039</i>
Application Name: WestConnex M4-M5 Link	Signature: <i>[Signature]</i>
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 object to the planned acquisition of the Dan Murphys site on Darley Road for the creation of a civil and tunnel works site as it will create unacceptable noise impacts for the community and lead to traffic chaos, along with creating an increased risk of accidents to pedestrians and cycle users.
2. The substation and water treatment plant proposed for Darley Road should be moved to the north end of the site near the City West link so that it is less visible to residents. 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.
3. The EIS permits trucks to access local roads in 'exceptional circumstances', which includes queuing at the site. Given the acknowledged constraints of the Darley Rd site (and based on experience with cars accessing the site for Dan Murphy's), queuing will be the norm and not the exception. The EIS, as pertains to the Darley Road site, needs to be amended to rule out queuing as an exceptional circumstance which allows trucks to use local roads.
4. At the conclusion of the construction period, the Darley Road 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 an increase in the green space for residents and result in a pleasant green environment for pedestrians, rather than a fenced facility. The approval conditions need to mandate that the Darley Rd site is to be preserved as green space or other community purposes at the conclusion of the construction period.
5. No trucks (heavy or light) should be permitted on any streets adjacent to Darley Road identified as NCA 13 (James Street to Falls Street). A blanket prohibition should be in force with respect to any worker vehicles from the construction site parking on these local streets. These homes will already suffer the worst construction impacts and should be spared the further imposition of lack of parking and the additional noise impacts of additional cars on their street. These local streets are not designed to handle heavy vehicle movements. Therefore, any approval conditions need to prohibit outright truck movements (including parking) and worker parking on all local streets adjacent to Darley Road.
6. Any approval conditions and the relevant construction contracts must require that all workers to the Darley Rd site are bussed in or use public transport such as the light rail, with no parking whatsoever permitted on local roads adjacent to the Darley Road site. The site currently provides only 11 car spaces for an estimated 100 workers a day on site. The project cannot be approved on this basis without a strict requirement on workers to use public transport or project provided transport and a prohibition needs to be in place against parking on local 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: Janette Willett

Signature: [Signature]

Please include / delete (cross out or circle) my personal information when publishing this submission to your website Declaration : I **HAVE NOT** made any reportable political donations in the last 2 years.

Address: 28 Callan 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

Application Name: WestConnex M4-M5 Link

- A. 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.
- B. 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.
- C. 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.
- D. 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).
- E. 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.
- F. I strongly object to the privatisation of the WestConnex project that turns public monies into private profit.
- G. 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.
- H. 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. 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.
- I. 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.
- J. OTHER :

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Name _____ Email _____ Mobile _____

Submission to : Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <i>Janette Willett</i> Signature: <i>Janette Willett</i>
Attention: Director – Transport Assessments	Please <i>include / delete (cross out or circle)</i> my personal information when publishing this submission to your website Declaration : I HAVE NOT made any reportable political donations in the last 2 years.
Application Number: SSI 7485 Application Name: WestConnex M4-M5 Link	Address: <i>28 Callan St</i>
	Suburb: <i>Rozelle</i> Postcode: <i>2039</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

- ✚ 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.

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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: Bonette Willett

Signature: [Signature]

Please include / delete (cross out or circle) my personal information when publishing this submission to your website Declaration : I **HAVE NOT** made any reportable political donations in the last 2 years.

Address: 28 Callan St

Suburb: Roselle 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

Application Name: WestConnex M4-M5 Link

- 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.
- 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.
- 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 Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <i>Janette Willett</i>
	Address: <i>28 Callan St</i>
Application Number: SSI 7485	Suburb: <i>Rozelle</i> Postcode <i>2039</i>
Application Name: WestConnex M4-M5 Link	Signature: <i>JM Willett</i>
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 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 has many caveats and depends upon further steps (such as traffic management plans), the detail of which is not provided. The community has no certainty that any of the impacts from construction will be managed to an acceptable level.
3. 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.
4. 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)
5. 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)
6. There are 36 homes identified as having severe noise impacts during construction in Leichhardt and Lilyfield. No noise barriers have been identified so residents are unable to comment as to whether this impact will be reduced. No proposal for alternative accommodation is provided. This is unacceptable and all of the proposed noise mitigation options should be detailed in the EIS so that residents have an opportunity to comment on what is proposed. (Executive Summary xvii)
7. There is no plan to manage traffic on Darley Road proposed in the EIS. This critical arterial road is regularly congested at peak periods. Reference in the EIS to developing a traffic management plan in the future is not acceptable. The detail of what is proposed needs to be contained in the EIS so that residents can assess whether the impact of 170 light and heavy vehicle movements a day in and out of the site can be acceptably managed.

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Name _____ Email _____ Mobile _____

Submission to : Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <u>JANETTE WILLET</u> Signature: <u>[Signature]</u>
Attention: Director – Transport Assessments	Please include <u>Delete (cross out or circle)</u> my personal information when publishing this submission to your website Declaration : I HAVE NOT made any reportable political donations in the last 2 years.
Application Number: SSI 7485 Application Name: WestConnex M4-M5 Link	Address: <u>28 CALLAN ST</u> 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

- This EIS provides no basis on which to approve such a complex project including the building of interchanges underneath Sydney suburbs Rozelle and Leichhardt. It would be absurd to approve the building of up to three tunnels under people's homes on the basis of such flimsy information.
- 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 that has multiple commercial interests in WestConnex.
- The EIS at 7-25 refers to 876 comments (limited to 140 characters) made via the collaborative map on the Concept Design 'up to July' that were considered in the preparation of the EIS. It does not mention the many hundreds of extended written submissions that were lodged in late July and early August. These critical 'community engagement' feedback submissions have clearly not been considered in the preparation of the EIS. This casts doubt over the integrity of the entire EIS process.
- 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.
- This EIS contains little or no meaningful design and construction detail. It appears to be a wish list not based on actual effects. Everything is indicative, 'would' not 'will', telling me nothing is actually 'known' for certain – and is certainly not included here.
- EIS 6.1 (Synthesis, Page 45) states. "..... this may result in changes to both the project design and the construction methodologies described and assessed in this EIS. Any changes to the project would be reviewed for consistency with the assessment contained in the EIS including relevant mitigation measures, environmental performance outcomes and any future conditions of approval". It is unstated just who would have responsibility for such a "review(ed) for consistency", and how these changes would be communicated to the community. The EIS should not be approved till significant 'uncertainties' have been fully researched and surveyed and the results (and any changes) published for public comment (ie : the Sydney Water Tunnels issues at 12-57)
- The original objectives of the project specified improving road and freight access to Sydney Airport and to Port Botany. Neither Stage 2 or 3 provides such access. Both the new M5 and the new M4-M5 Link will dump 1,000s more per day onto the roads to the Airport which are already at capacity.
- 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.
- Unfiltered stacks anywhere in Sydney are not unacceptable. There must be a review of the NSW government's unacceptable policy on this issue. I am appalled that the ex Minister for Planning Rob Stokes who approved the New M5 and unfiltered stacks in St Peters and Haberfield would declare that he would not have them in his own area. How can residents have any trust in a process that is underpinned by such hypocrisy.
- The EIS at 7-51 refers to concerns that were raised by the community that the alignment of tunnels in Newtown appeared to go to the east of King Street, an area that had had no geotech drilling or testing. SMC staff indicated at Community information sessions that the maps included in the Concept Design were broad and indicative only, and that further details would be available in the EIS. No further details have been provided. This casts doubt over the integrity of the entire EIS process.
- Other Comments I would like to make :

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Name _____ Email _____ Mobile _____

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <i>Janette Willett</i>
Application Number: SSI 7485	Address: <i>28 Callan St</i>
Application Name: WestConnex M4-M5 Link	Suburb: <i>Rozelle</i> Postcode <i>2039</i>
Signature: <i>Janette Willett</i> 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 object to the planned acquisition of the Dan Murphys site on Darley Road for the creation of a civil and tunnel works site.
2. The Darley Road site has many issues which make tunneling at this point an unacceptable risk, including that it is in a flood zone. This proposal will worsen the existing flooding risk. The mitigation suggested in the EIS is not adequate.
3. The EIS states that property damage will occur due to ground movement may occur. The EIS states that 'settlement, induced by tunnel excavation, and groundwater drawdown, may occur in some areas along the tunnel alignment'. The proposed tunnel alignment creates an unacceptable risk of ground movement. We object to the project in its entirety on this basis. The risk of ground movement is lessened where tunnelling is more than 35 metres. However, some tunnelling is at less than 10 metres.
4. The EIS states that 'a preferred noise mitigation option' would be determined during 'detailed design'. This approach deprives residents of any ability to comment on the detailed designs. (Executive Summary xvi)
5. The EIS does not mention the impact of aircraft noise and its cumulative impact. Therefore, noise levels identified in the EIS are misleading. The EIS states there will be at least 10 weeks of severe noise impacts during the time that Dan Murphys is demolished and the road prepared. I object to the selection of the Darley Road site because of the unacceptable noise impacts it will have on surrounding homes and businesses, with at least 36 homes identified as suffering extreme noise interference for this initial 10-week period.
6. The EIS states that all vegetation will be removed on the Darley Road site which includes several mature trees. I object to the removal of these trees which create a visual and noise barrier for residents from the City West Link. If the trees are removed they must be replaced with mature trees as soon as the remediation of the site commences.
7. There is no evidence provided in the EIS that the ventilation outlets will be safe. 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.
8. The proposal for a permanent water treatment plant and substation to the south of the site on Darley Road will prevent direct pedestrian access to the light rail station. It will affect the future uses of the site once the project is completed. The facility is out of step with the area which is comprised of low rise homes and detracts from the visual amenity of the area. This site is a pedestrian hub and will be a visual blight for pedestrians, bike users and the homes that have direct line of sight to the facility. It should not be permitted to be located on this site.

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Name _____ Email _____ Mobile _____

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <i>Janette Willett</i>
Application Number: SSI 7485	Address: <i>28 Callan St</i> Suburb: <i>Rozelle</i> Postcode <i>2039</i>
Application Name: WestConnex M4-M5 Link	Signature: <i>J Willett</i>
Please include 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 object to the selection of Darley Road as a civil and construction site on the following grounds.
2. The period of construction proposed is unacceptably long. Leichhardt residents were repeatedly told by SMC that the Darley Road site would be operational for three years while the EIS states that it will be operational for 5 years. This period creates an unacceptable impact for residents. The works on the site should be restricted to a three-year program as was promised.
3. The noise impacts of construction are not able to be mitigated to an acceptable level and the EIS should not be approved on this basis. The EIS states that 36 homes will have unacceptable noise impacts for extended periods at the Darley road construction site. The EIS does not mention the cumulative impact of aircraft noise in the Leichhardt or St Peters area, and therefore does not reflect the true impact of construction noise on the amenity of nearby residents and businesses.
4. No truck movements should be permitted on Darley Rd or any local roads in Leichhardt or adjoining suburbs. The EIS should not be approved on its current basis which provides for 170 heavy and light vehicles accessing Darley Road on a daily basis. This will create unacceptable safety issues and noise impacts for adjacent homes while also compromising pedestrian and bicycle access to the light rail and bay run. It will also lead to truck chaos on this critical arterial road providing access to and across the City West Link. The EIS states that an alternative truck movement is proposed which involves use of the City West Link and no need for spoil trucks to access Darley Road. I object to the selection of the Darley Rd site altogether, but propose this alternative, which appears to represent the least worst impact, should be chosen if this site is to be used.
5. I object to the number of truck movements proposed at the Darley Road site. The EIS states that there will be daily movements of 170 heavy and light vehicles accessing Darley Road. This creates an unacceptable risk to the safety of pedestrians accessing the North Leichhardt light rail stop as well as bicycle users accessing the bicycle route on Darley Road and entering Canal road to join the dedicated bike paths on the bay run. Many school children cross at this point to walk to Orange Grove and Leichhardt Secondary College. The EIS states that an alternative truck movement is proposed which involves use of the City West Link with no trucks to access Darley Road. The selection of Darley Road should not be approved if it involves any truck movements on Darley Road, as is currently provided.
6. No workers associated with the WestConnex project should be permitted to park on local streets. Parking is at a premium in this area and many residents 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 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 and provide a plan for enforcement (to be paid for by my SMC and not by the Inner West Council).

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]
Sent: [REDACTED]
To: [REDACTED]
Subject: FW: Submission Details
Attachments: 227868_Westconnex 3 [REDACTED]_2017Oct16_0232.pdf

From: system@accelo.com On Behalf Of [REDACTED]
Sent: Monday, 16 October 2017 2:33:09 AM (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:
see attached

IP Address: [REDACTED]
Submission: Online Submission from [REDACTED] (object)
https://majorprojects.accelo.com/?action=view_activity&id=227868

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

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

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: [REDACTED]
	Address: [REDACTED]
Application Number: SSI 7485	Suburb: [REDACTED] Postcode [REDACTED]
Application Name: WestConnex M4-M5 Link	Signature: [REDACTED]
Please [REDACTED] / Exclude (circle) 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.

Noise and disruption from construction:

I object to the proposal for the Darley Road Civil and Tunnel Construction site at Leichhardt because of the noise and disruption impact it will have on residents during periods of extended construction.

The proponent has a very poor track record of managing the impacts of Stages 1 and 2 of this project. In addition the conditions of approval are so broad as to make enforcing compliance with Council or EPA regulations impossible. The protections for residents are ineffectual and the abuse of the Critical State Significant Infrastructure powers is continuous.

The reality for residents living with the Stages 1 and 2 of WestConnex is night after night of disruption and disturbance with no respite and no way of enforcing compliance. In addition, the policy for mitigation entitlements such as noise protection or respite accommodation is not transparent and is discretionary. Many residents especially the most vulnerable such as those in rental properties or in public housing are unwilling to complain about their situation.

In St Peters in mid-September 2017 the Stage 2 Joint venture's contractors were digging up pipes all one weekend, resulting in two burst water mains. They worked through Saturday night until after 1am on Sunday morning when they should have finished at 6pm on Saturday. Many of the residents were without water for much of the weekend. On Monday night at 8.30pm RMS turned up unannounced with concrete saws and jackhammers. On Tuesday night, RMS were supposed to stop at 6pm but again the work until after midnight. A resident whose bedroom was right next door to the work, posted a video of the deafening concrete saws in use after midnight with the caption "It's impossible to live here at the moment".

Many local residents are unaware of the construction impacts and that there will be months of construction work which will have to take place out of hours. The EIS does not specify which works to establish the site will take place during standard construction hours.

The Department of Planning and Environment should ensure that the conditions of any approval are stringent and should require the proponent to pay a predetermined amount of ex gratia payment to residents for each night of disturbance.

This should be sufficiently high to deter extended periods of out of hours work at the Darley Road Civil and Tunnel Construction site at Leichhardt.

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: FW: Submission Details
Attachments: 227864_Westconnex 1 [REDACTED]_2017Oct16_0229.pdf

From: system@accelo.com On Behalf Of [REDACTED]
Sent: Monday, 16 October 2017 2:30:15 AM (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:
see attached

IP Address: [REDACTED]
Submission: Online Submission from [REDACTED] (object)
https://majorprojects.accelo.com/?action=view_activity&id=227864

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

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

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: [REDACTED]
	Address: [REDACTED]
Application Number: SSI 7485	Suburb: [REDACTED] Postcode: [REDACTED]
Application Name: WestConnex M4-M5 Link	Signature: [REDACTED]
<p style="text-align: center;">Please delete / Exclude (circle) my personal information when publishing this submission to your website Declaration : I HAVE NOT 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, and request the Minister reject the application.

Traffic and transport – spoil haulage routes:

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 route identification and scheduling of transport movements, particularly outside standard construction hours.

The proponent has only provided indicative spoil haulage routes in relation to the proposed Civil and Tunnel Construction site at Darley Road Leichhardt. In 8.3.1 of the EIS the proponent states that 'Spoil haulage routes would be confirmed during detailed design.'

The proponent has not provided an assessment of each of the possible spoil haulage route options even though both SMC and RMS have discussed these with stakeholders prior to release of the EIS.

Spoil haulage has a high environmental impact and the failure to describe the impacts of each of the possible spoil haulage options is a serious defect in the EIS.

The proponent should be required to abandon the Darley Road civil and tunnel site Leichhardt.

Alternatives have been identified which will allow spoil haulage directly onto the City West Link and the proponent has not given an adequate explanation as to why these alternatives have not been included in the EIS.

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.

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: FW: Submission Details
Attachments: 227866_Westconnex 2 [REDACTED]_2017Oct16_0230.pdf

From: system@accelo.com On Behalf Of [REDACTED]
Sent: Monday, 16 October 2017 2:31:14 AM (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:
see attached

IP Address: [REDACTED]
Submission: Online Submission from [REDACTED] (object)
https://majorprojects.accelo.com/?action=view_activity&id=227866

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

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

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: [REDACTED]
	Address: [REDACTED]
Application Number: SSI 7485	Suburb: [REDACTED] Postcode [REDACTED]
Application Name: WestConnex M4-M5 Link	Signature: [REDACTED]
<p>Please [REDACTED] / Exclude (circle) my personal information when publishing this submission to your website Declaration : I HAVE NOT 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, and request the Minister reject the application.

Noise and disruption from construction:

I object to the proposal for the Darley Road Civil and Tunnel Construction site at Leichhardt because of the noise and disruption impact it will have on residents during periods of extended construction.

The proponent has a very poor track record of managing the impacts of Stages 1 and 2 of this project. In addition the conditions of approval are so broad as to make enforcing compliance with Council or EPA regulations impossible. The protections for residents are ineffectual and the abuse of the Critical State Significant Infrastructure powers is continuous.

The reality for residents living with the Stages 1 and 2 of WestConnex is night after night of disruption and disturbance with no respite and no way of enforcing compliance. In addition, the policy for mitigation entitlements such as noise protection or respite accommodation is not transparent and is discretionary. Many residents especially the most vulnerable such as those in rental properties or in public housing are unwilling to complain about their situation.

In St Peters in mid-September 2017 the Stage 2 Joint venture's contractors were digging up pipes all one weekend, resulting in two burst water mains. They worked through Saturday night until after 1am on Sunday morning when they should have finished at 6pm on Saturday. Many of the residents were without water for much of the weekend. On Monday night at 8.30pm RMS turned up unannounced with concrete saws and jackhammers. On Tuesday night, RMS were supposed to stop at 6pm but again the work until after midnight. A resident whose bedroom was right next door to the work, posted a video of the deafening concrete saws in use after midnight with the caption "It's impossible to live here at the moment".

There are many Sydney Water pipes and Council stormwater drains in the site footprint. These are vulnerable to damage. A burst water main or broken pipe leading to water being cut off is inevitable.

If the planned electrical works take place to establish a power supply to the Darley Road Civil and Tunnel Construction site at Leichhardt then disruption of power, NBN and telecoms is also inevitable.

The proponent should be required to have a plan in place to keep residents' power on and to keep residents connected and should communicate this plan to residents. The plan might include portable wifi devices or compensation for disruption. There must be a disincentive to causing disruption.

The proponent should be required to have a plan in place for a burst water main which includes immediately relocating residents and providing a secondary source of water.

The proponent should be required to plan for a secondary source of water so that there is no disruption of supply. no have the Residents should be kept informed regularly about how work is going to impact them.

From: [REDACTED]
Sent: Sun, 15 Oct 2017 15:35:51 +0000
To: [REDACTED]
Subject: FW: Submission Details
Attachments: 227870_Westconnex 4 [REDACTED]_2017Oct16_0234.pdf

From: system@accelo.com On Behalf Of [REDACTED]
Sent: Monday, 16 October 2017 2:35:11 AM (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:
see attached

IP Address: [REDACTED]

Submission: Online Submission from [REDACTED] (object)

https://majorprojects.accelo.com/?action=view_activity&id=227870

Submission for Job: #7485 WestConnex M4-M5 Link

https://majorprojects.accelo.com/?action=view_job&id=7485

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: [REDACTED]
	Address: [REDACTED]
Application Number: SSI 7485	Suburb: [REDACTED] Postcode [REDACTED]
Application Name: WestConnex M4-M5 Link	Signature: [REDACTED]
<p>Please include Exclude (circle) my personal information when publishing this submission to your website Declaration : I HAVE NOT 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, and request the Minister reject the application.

Noise and disruption from construction:

I object to the proposal for the Darley Road Civil and Tunnel Construction site at Leichhardt because of the noise and disruption impact it will have on residents during periods of extended construction.

The proponent has a very poor track record of managing the impacts of Stages 1 and 2 of this project. In addition the conditions of approval are so broad as to make enforcing compliance with Council or EPA regulations impossible. The protections for residents are ineffectual and the abuse of the Critical State Significant Infrastructure powers is continuous.

The reality for residents living with the Stages 1 and 2 of WestConnex is night after night of disruption and disturbance with no respite and no way of enforcing compliance. In addition, the policy for mitigation entitlements such as noise protection or respite accommodation is not transparent and is discretionary. Many residents especially the most vulnerable such as those in rental properties or in public housing are unwilling to complain about their situation.

In St Peters in mid-September 2017 the Stage 2 Joint venture's contractors were digging up pipes all one weekend, resulting in two burst water mains. They worked through Saturday night until after 1am on Sunday morning when they should have finished at 6pm on Saturday. Many of the residents were without water for much of the weekend. On Monday night at 8.30pm RMS turned up unannounced with concrete saws and jackhammers. On Tuesday night, RMS were supposed to stop at 6pm but again the work until after midnight. A resident whose bedroom was right next door to the work, posted a video of the deafening concrete saws in use after midnight with the caption "It's impossible to live here at the moment".

Many local residents are unaware of the construction impacts and that there will be months of construction work which will have to take place out of hours. The EIS does not specify which works to establish the site will take place during standard construction hours.

The Department of Planning and Environment should ensure that the conditions of any approval are stringent and prohibit out of hours work at the Darley Road Civil and Tunnel Construction site at Leichhardt for more than 2 nights in a row and in any two week period.

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: [REDACTED]	
Application Number: SSI 7485	Address: [REDACTED]	
Application Name: WestConnex M4-M5 Link	Suburb: [REDACTED]	Postcode [REDACTED]
	Signature: [REDACTED]	
Please <u>include / delete (cross out or circle)</u> 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:

1. 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.
2. 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.
3. 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.
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. 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.
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. 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.
8. 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.

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: [REDACTED]	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature: [REDACTED]	Attn: Director – Transport Assessments
Please <u>include / delete (cross out or circle)</u> my personal information when publishing this submission to your website Declaration : I HAVE NOT made any reportable political donations in the last 2 years.	
Address: [REDACTED]	Application Number: SSI 7485 Application
Suburb: [REDACTED] Postcode: [REDACTED]	Application Name: WestConnex M4-M5 Link

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

- 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 _____

Attention Director Application Number: SSI 7485 Application Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001 Application Name: WestConnex M4-M5 Link	Name: [REDACTED]
	Signature: [REDACTED]
	Please include / delete (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.
	Address: [REDACTED]
	Suburb: [REDACTED] Postcode [REDACTED]

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

- I. 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 ?
- II. 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.
- III. 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.
- IV. 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.
- V. 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.
- VI. 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.
- VII. 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.
- VIII. 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.
- IX. 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.
- X. 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.

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Name _____ Email _____ Mobile _____

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

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

- I. 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.
- II. 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.
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- V. 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 ?
- VI. 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.
- VII. 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.
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- IX. 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.
- X. 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 _____

Submission from: Name: Signature: Please <u>include / delete (cross out or circle)</u> 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: Postcode:	Submission to: Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001 Attn: Director – Transport Assessments Application Number: SSI 7485 Application Application Name: WestConnex M4-M5 Link
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

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

- o This EIS provides no basis on which to approve such a complex project including the building of interchanges underneath Sydney suburbs Rozelle and Leichhardt. It would be absurd to approve the building of up to three tunnels under people's homes on the basis of such flimsy information.
- o 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 that has multiple commercial interests in WestConnex.
- o The EIS at 7-25 refers to 876 comments (limited to 140 characters) made via the collaborative map on the Concept Design 'up to July' that were considered in the preparation of the EIS. It does not mention the many hundreds of extended written submissions that were lodged in late July and early August. These critical 'community engagement' feedback submissions have clearly not been considered in the preparation of the EIS. This casts doubt over the integrity of the entire EIS process.
- o 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.
- o This EIS contains little or no meaningful design and construction detail. It appears to be a wish list not based on actual effects. Everything is indicative, 'would' not 'will', telling me nothing is actually 'known' for certain – and is certainly not included here.
- o EIS 6.1 (Synthesis, Page 45) states. "..... this may result in changes to both the project design and the construction methodologies described and assessed in this EIS. Any changes to the project would be reviewed for consistency with the assessment contained in the EIS including relevant mitigation measures, environmental performance outcomes and any future conditions of approval". It is unstated just who would have responsibility for such a "review(ed) for consistency", and how these changes would be communicated to the community. The EIS should not be approved till significant 'uncertainties' have been fully researched and surveyed and the results (and any changes) published for public comment (ie : the Sydney Water Tunnels issues at 12-57)
- o The original objectives of the project specified improving road and freight access to Sydney Airport and to Port Botany. Neither Stage 2 or 3 provides such access. Both the new M5 and the new M4-M5 Link will dump 1,000s more per day onto the roads to the Airport which are already at capacity.
- o 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.
- o Unfiltered stacks anywhere in Sydney are not unacceptable. There must be a review of the NSW government's unacceptable policy on this issue. I am appalled that the ex Minister for Planning Rob Stokes who approved the New M5 and unfiltered stacks in St Peters and Haberfield would declare that he would not have them in his own area. How can residents have any trust in a process that is underpinned by such hypocrisy.
- o The EIS at 7-51 refers to concerns that were raised by the community that the alignment of tunnels in Newtown appeared to go to the east of King Street, an area that had had no geotech drilling or testing. SMC staff indicated at Community information sessions that the maps included in the Concept Design were broad and indicative only, and that further details would be available in the EIS. No further details have been provided. This casts doubt over the integrity of the entire EIS process.
- o Other Comments

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: Monday, 16 October 2017 1:14 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 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.

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 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, [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 To learn more about web protocol FC 3834 visit: www.rfc-base.org/rfc-3834.html

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

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.

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: [REDACTED] Signature: [REDACTED]
Attention: Director – Transport Assessments	<i>Please include / delete (cross out or circle) my personal information when publishing this submission to your website Declaration : I HAVE NOT made any reportable political donations in the last 2 years.</i>
Application Number: SSI 7485 Application Name: WestConnex M4-M5 Link	Address: [REDACTED] Suburb: [REDACTED] Postcode [REDACTED]

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

- 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.
- Other Comments :

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Name _____ Email _____ Mobile _____

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

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

- 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.
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Name _____ Email _____ Mobile _____

Submission from:	Submission to:
Name:.....	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature.....	Attn: Director – Transport Assessments
Please <u>include / delete (cross out or circle)</u> 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:	Application Number: SSI 7485 Application
Suburb: Postcode:	Application Name: WestConnex M4-M5 Link

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

- The 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 _____

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: FW: Submission Details
Attachments: 227772_[REDACTED]_Impact_M4M5_2017Oct15_2141.pdf

From: system@accelo.com On Behalf Of [REDACTED]
Sent: Sunday, 15 October 2017 9:42:12 PM (UTC+10:00) Canberra, Melbourne, Sydney
To: [REDACTED]
Subject: Submission Details

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

Name: [REDACTED]
Email: [REDACTED]

Address:
[REDACTED]
[REDACTED]

Content:
I object to a decision being made by the minister before plans have been finalised.

IP Address: [REDACTED]
Submission: Online Submission from [REDACTED] (object)
https://majorprojects.accelo.com/?action=view_activity&id=227772

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

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

SUBMISSION: WESTCONNEX M4-M5 LINK

REPLY PAID 8814
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:

Yours sincerely,



DATE: 15/10/2017



Submission from: [REDACTED]	Submission to:
Name: [REDACTED]	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature: [REDACTED]	Attn: Director – Transport Assessments
Please <u>include</u> exclude (circle) my personal information when publishing this submission to your website Declaration : I HAVE NOT made any reportable political donations in the last 2 years.	
Address: [REDACTED]	Application Number: SSI 7485 Application
Suburb: [REDACTED] ...Postcode [REDACTED]	Application Name: WestConnex M4-M5 Link

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

Crash statistics – City West Link and James St intersection.

- (1) 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 needs to detail the increased risk in crashes that will be caused by the additional 170 vehicles a day that are proposed to enter and leave Darley Road during the construction period.

Traffic operational modelling – Leichhardt.

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

Worker parking – Leichhardt.

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

Heavy vehicle movements during peak hours – Leichhardt.

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

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Address:	Application Name: WestConnex M4-M5 Link
Suburb:Postcode:	

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Permanent substation and water treatment plant - Leichhardt

- I. 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.

Noise mitigation – Leichhardt.

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

Flooding – Leichhardt.

- III. 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.

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Address:	Application Name: WestConnex M4-M5 Link
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- The EIS proposes that all trucks will arrive at the Darley Road civil and tunnel site from Haberfield and travel along Darley Road to the site, with a right-hand turn now permitted into James Street. The proposed route will result in a truck every 3-4 minutes for 5 years running directly by the small houses on Darley Road. These homes will not be habitable during the five-year construction period due to the unacceptable noise impacts. The truck noise will be worsened by their need to travel up a steep hill to return to the City West Link, so the noise impacts will affect not just those homes on or immediately adjacent to Darley Road. The proposal to run trucks so close to homes is dangerous. 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 EIS states that there are 'investigations' occurring into alternative access to the Darley Road site. The EIS does not provide any detail on which residents can comment about alternative access which would keep trucks off Darley Road. No spoil truck movements should be permitted on Darley Road and the plans for alternative access should be expedited. It should be a condition of approval that the alternative access is confirmed and that no spoil trucks are permitted to access Darley Road due to the unacceptable noise, safety and traffic issues that the current proposal creates.
- 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 Murphys building has asbestos which creates additional risk during the demolition process.
- 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.

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Name: [REDACTED]	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature: [REDACTED]	Attn: Director – Transport Assessments
Please <u>include / exclude (circle)</u> my personal information when publishing this submission to your website Declaration : I HAVE NOT made any reportable political donations in the last 2 years.	Application Number: SSI 7485 Application
Address: [REDACTED]	Application Name: WestConnex M4-M5 Link
Suburb: [REDACTED] Postcode [REDACTED]	

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Vegetation: Leichhardt.

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

Permanent substation and water treatment plant – Leichhardt:

- B. I object to the location of this facility in our neighbourhood as out of step with the surroundings. If it is retained, then it should be moved to the north of the site, out of view from homes. The residual land should be returned for community purposes such as parkland.

No need for 'dive' site – Leichhardt.

- C. There is no need for the Darley Road site, other than a time saving (tunneling) of several months. It is unacceptable that the community should be forced to endure 5 years of severe disruption to accommodate the timetable of the private contractors. The EIS should not be approved on the basis that it contains provision for the Darley Road site without any proper justification as for its need.

Acquisition of Dan Murphys –

- D. 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.

Night works – Leichhardt.

- E. 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.

Additional facilities - Leichhardt.

- F. 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.

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Address:	Application Number: SSI 7485 Application
Suburb: Postcode	Application Name: WestConnex M4-M5 Link

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

- ❖ The EIS states that 'a preferred noise mitigation option' would be determined during 'detailed design'. This is unacceptable and residents have no opportunity to comment on the detailed designs. The failure to include this detail means that residents have no idea as to what is planned and cannot comment or input into those plans. (Executive Summary xvi)
 - ❖ The EIS does not provide appropriate parking for the estimated 100 or so workers that the EIS states will work every day at the site, while other equivalent sites have allocated parking for such workers (Northcote Civil site (150)) and Parramatta Road East Civil site (140). It is also noted that the EIS provides for loss of 20 residential parks on Darley Road. Local streets are at capacity already because of the lack of off-street parking for many residents and the Light Rail stop which means that commuters use local streets. The EIS states that workers 'will be encouraged to use public transport.' The reference to The EIS needs to mandate that no trucks or construction vehicles are to park in local streets. There needs to be a requirement that is enforceable that workers use the Light Rail stop which is adjacent to the site or a plan to bus in workers.
 - ❖ We object to the proposal to the Darley Road civil and tunnel site because of the unacceptable risk it will create to the safety of our community. The traffic forecasts indicate that Darley Road will have 170 heavy and light vehicle movements a day. Darley Road is a known accident and traffic blackspot and the movements of hundreds of trucks a day will create an unacceptable risk of accidents.
- On Transport for NSW's own figures, the intersection at the City West Link and James Street is the third most dangerous in the inner west. The addition of hundreds of heavy truck movements a day into that intersection will increase the risk of serious accidents for both pedestrians and drivers. The EIS states that the levels of service are expected to Darley Road is directly next to the North Leichhardt Light Rail stop which is a pedestrian hub. Children travelling to school walk to the stop. Active transport users such as bicycle riders will be at risk, along with pedestrians using Canal Road to access the Bay Run, Leichhardt pool and the dog park.
- ❖ 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.

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- The construction and operation of the project will result in 51 property acquisitions. We object to the project in its entirety because of this impact. We note that a number of long-standing businesses have been acquired and that many families and businesses in earlier stages have been forced to go to court to seek fair compensation. We object to the acquisition in particular of the Dan Murphys site. The business was substantially renovated and a new business opened with full knowledge of the likely acquisition. We object to it being acquired and compensated in this circumstances and call on the Government to investigate the circumstances which led to this occurring (Executive Summary xvii)
- No noise barriers have been proposed. This is unacceptable and appropriate noise barriers should be included in the EIS for consideration. (Executive Summary xvii)
- The EIS states that property damage due to ground movement may occur. We object to the project in its entirety on this basis. The EIS states that 'settlement, induced by tunnel excavation, and groundwater drawdown, may occur in some areas along the tunnel alignment'. The risk of ground movement is lessened where tunnelling is more than 35 metres. However, some tunnelling is at less than 10 metres. This proposed tunnel alignment creates an unacceptable risk of ground movement. In addition, the EIS states that there are a number of discrete areas to the north and northwest of the Rozelle Rail Yards, to the north of Campbell Road at St Peters and in the vicinity of Lord Street at Newtown where ground water movement above 20 milliliters is predicted 'strict limits on the degree of settlement permitted would be imposed on the project' and 'damage' would be rectified at no cost to the owner. would be placed (Executive Summary, xvii -iii). The project should not be permitted to be delivered in such a way that there is a known risk to property damage that cannot be mitigated to an acceptable level of risk.
- 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.

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- ◇ The EIS states that 'reasonable and feasible work practices and mitigation measures would be implemented to minimise potential noise impacts due to activities occurring at the Darley Road civil and tunnel site.' 96-52) This is not good enough. The EIS does not contain any detail whatsoever of these proposal on which they can comment. In addition, there is no requirement that measures will in fact be introduced to address noise impacts. The approval conditions need to contain detail of specific noise mitigation measures that are mandated and can be enforced.
- ◇ The EIS does not require an acoustic shed and states that 'Acoustic barriers and devices at the access tunnel entrances would be considered and implemented where reasonable and feasible to minimise potential noise impacts associated with out-of-hours works within the tunnels.' (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 Darley Road site will not be returned after the project, with a substantial portion permanently housing a Motorways Operations facility which involves a substation and water treatment plant. This means that the residents will not be able to directly access the North Light rail Station from Darley Road but will have to traverse Canal Road and use the narrow path from the side. In addition the presence of this facility reduces the utility of this vital land which could be turned into a community facility. Over the past 12 months community representatives were repeatedly told that the land would be returned and this has not occurred. We also object to the location of this type of infrastructure in a neighbourhood setting.

From: [REDACTED]
Sent: Sun, 15 Oct 2017 20:33:15 +0000
To: [REDACTED]
Subject: FW: Submission Details for Bronwyn Monro (object)

From: system@accelo.com On Behalf Of Bronwyn Monro
Sent: Monday, 16 October 2017 7:33:04 AM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for Bronwyn Monro (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Bronwyn Monro
[REDACTED]

Address:
[REDACTED]

Balmain, NSW
2041

Content:

I have asthmatic grandchildren.

I am very alarmed that smoke stacks from WestConnex will be at the end of my street after it wobbles into Terry Street. I am alarmed that there are two schools close by, but I am also alarmed that there will be houses and units with children like my grandchildren who will be severely affected by the pollution from these stacks.

I guess the air from all those exhausts has to go somewhere but how horrendous that it is not at least filtered. Moving the stacks away from the schools would seem the minimum culpability the builders could undertake.

I know that there is proof in that asthmatics are affected by proximity of exhaust stacks. Now it the time to protect them, not in some distant future when we only have electric cars and trucks.

[REDACTED]
 Submission: Online Submission from Bronwyn Monro (object)
https://majorprojects.accelo.com/?action=view_activity&id=227885

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

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

From: [REDACTED]
Sent: Mon, 16 Oct 2017 02:19:51 +0000
To: [REDACTED]
Subject: FW: Submission Details for robert moxey (object)

From: system@acelo.com On Behalf Of robert moxey
Sent: Monday, 16 October 2017 1:18:02 PM (UTC+10:00) Canberra, Melbourne, Sydney
[REDACTED]
Subject: Submission Details for robert moxey (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: robert moxey
[REDACTED]

Address:
[REDACTED]

cammeray, NSW
2062

Content:

[REDACTED]
Submission: Online Submission from robert moxey (object)
https://majorprojects.acelo.com/?action=view_activity&id=228058

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

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

From: [REDACTED]
Sent: Mon, 16 Oct 2017 02:42:00 +0000
To: [REDACTED]
Subject: FW: Submission Details for Gary Speechley (object)
Attachments: 228078_20171015_ M4M5 EIS Objection_ Speechley GC_2017Oct16_1333.pdf

From: system@accelo.com On Behalf Of Gary Speechley
Sent: Monday, 16 October 2017 1:35:13 PM (UTC+10:00) Canberra, Melbourne, Sydney
[REDACTED]
Subject: Submission Details for Gary Speechley (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Gary Speechley
[REDACTED]

Address:
[REDACTED]

Alexandria, NSW
2015

Content:
My objection is outlined in the enclosed PDF document

[REDACTED]
Submission: Online Submission from Gary Speechley (object)
https://majorprojects.accelo.com/?action=view_activity&id=228078

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

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

GARY SPEECHLEY

41 Suttor Street Alexandria NSW 2015

Phone: +61 (0)2 9519 6080 Mobile: +61 (0)4 0701 4879 Email : gary@speechley.net

Date: 15 October 2017

Reference: Objection to the M4-M5 Environmental Impact Statement

NSW Department of Planning
320 Pitt Street
Sydney NSW 2000

To whom it may concern.

I submit this objection to the M4-M5 "Stage 3" section of westCONnex.

Here we are, now some years through this project and the original intention proposed by Nick Greiner for a \$10 billion link to Port Botany and to Sydney Airport still has not been realised.

Indeed, some \$16.8 billion has been spent on westCONnex alone, without considering the many billions of dollars on supporting infrastructure and construction that has been labelled "outside the scope" of westCONnex.

In fact, I'm certain much more than \$16.8 billion has been spent on westCONnex but the details have been hidden from public scrutiny by using the corporate structure behind the Sydney Motorways Corporation.

I'm also certain that we will not learn of the final costs associated with this ill-conceived and poorly-planned project.

Hiding behind claims of "Commercial-In-Confidence" is unacceptable in relation to the expenditure of public monies.

The complete ignorance, by planners and government, of proper evidence-based planning processes amounts to actions that demand further investigation not only by Auditors General (since funds have been spent at both State and Federal levels) but by the NSW Independent Commission Against Corruption (ICAC).

Section 51(xxxi) of the Constitution of Australia provides that the Commonwealth has the power to make laws with respect to "the acquisition of property **on just terms** from any State or person for any purpose in respect of which the Parliament has power to make laws." It is both a power and a constitutional guarantee of just compensation for property rights contingent on its exercise.

The appalling treatment of residents affected by this wasteful project also reflects a shameful aspect of the execution of major projects in NSW, and still many remain significantly out of

pocket from the disgraceful processes that have deprived them of fair and reasonable compensation, “on just terms”.

Summary

As resident of Alexandria and a citizen of New South Wales, I strongly **object** to the WestConnex M4-M5 Link for the following reasons:

- It fails to meet the primary objectives of providing a direct motorway connection between Western Sydney and Sydney Airport and Port Botany. This is a fundamental failure of the entire project and ignores the reasons behind the original proposal.
- The EIS should either include the Sydney Airport Gateway and its costs, or else it should exclude the Sydney Airport Gateway and its benefits. To evaluate benefits but not the concurrent costs is a catastrophic and dishonest misrepresentation, fails the probity test and calls the entire project into question.
- There is no strategic justification for the project. There never has been.
- No feasible alternatives have been developed or adequately assessed.
- There are severe impacts on the community of Alexandria where I live and our neighbouring suburbs – this will have huge impact now and for future generations.
- The EIS does not adequately account for impacts on health and air quality. The EIS identifies an additional five unfiltered ventilation stacks to be constructed in inner Sydney – including our suburbs. In addition, local surface roads will be widened and traffic volumes will increase.
- The additional billions of dollars spent on these “supplementary” projects are considered outside the scope and budget of westCONnex, further hiding the true costs of these projects from scrutiny by the citizens of New South Wales. Indeed, they are required because the modelling of traffic flows associated with westCONnex were so poorly conducted.
- There is no alignment with the NSW Government’s priorities and policies for an integrated transport solution to Sydney’s growth challenges. This is a fundamental failure of the Government’s planning processes and calls into question why so much focus has been devoted to what will be privately-owned and operated toll roads as opposed to publicly funded and accessible public transport.
- The EIS forecasts that the Project will have disastrous effects on bus travel times and reliability.

Alexandria is already subjected to high levels of congestion due to rapid over-development and huge increases in population – and there is more to come with the development of the Ashmore Estate, the numerous residential developments planned or in construction, the proposed overdevelopment of the site above the Waterloo Metro Station, and the current joint (over)-development of the Australian Technology Park by Mirvac and the Commonwealth Bank.

The EIS shows that WestConnex is not the solution to this growing problem – on the contrary, it will only worsen it. Moreover, if Alexandria and neighbouring suburbs are congested, the entire project will fail, as this is the end-point for the M4-M5 link.

Strategic Alternatives

The Secretary’s Environmental Assessment Requirements (SEARS) require analysis of feasible alternatives to the project. But no feasible alternatives have been developed and no objective, evidence-based analysis of alternatives has been undertaken.

- Section 4.4 of the EIS purports to cover *Strategic Alternatives*, but does little more than offer a discussion of why an alternative was not pursued.
- Better use of existing road infrastructure has not been analysed as a feasible alternative. The EIS only refers to existing RMS programs.
- At a minimum, the EIS should carry out transport modelling and economic analysis to assess: improvements to the existing arterial road network (Strategic Alternative 1), alternative transport modes (Strategic Alternative 2) and travel demand management (Strategic Alternative 3)
- Given the disastrous record of similar tollway projects in the past, there should also be a discussion as to how modelling and forecasting practices have been improved
- The consideration of alternatives should also incorporate best practices from other leading global cities

Section 4.1 of Volume 1A (4-15) says that five alternatives were considered:

- Alternative 1 – improvements to the existing arterial road network
- Alternative 2 – investment in alternative transport modes
- Alternative 3 – demand management
- Alternative 4 – the ‘do nothing’/‘do minimum’ case
- Alternative 5 – development of the M4-M5 Link.

Alternative 1 is dismissed because:

- “improvements to the arterial road network *alone*, ..., are not a feasible or long-term alternative to the project.” (4-16, my emphasis)

Alternative 2 is dismissed because:

- “Public transport improvements *alone* are ... not a viable alternative” (4-20, my emphasis),
- “Rail freight improvements *alone* are ... not a viable alternative” (4-21, my emphasis),
- “cyclist and pedestrian infrastructure *alone* would not cater for the diverse travel demands within the project footprint *that are best met by road Infrastructure.*” (4-25, emphasis mine).

Alternative 3 is dismissed because:

- “Travel demand management changes *alone* are ... not a viable alternative” (4-27, my emphasis)

Because each of the above Alternatives, *alone*, is not an alternative to the project, the EIS concludes that the project is necessary.

However, the EIS explicitly acknowledges that the project “*alone* would not be able to accommodate the additional container traffic” (4-23, my emphasis), and recommends that all of the alternatives be pursued.

Section 4.1 of the EIS acknowledges that Alternative 1 would “provide incremental change in the efficiency of the road network”.

The EIS acknowledges that Arterial upgrades “would provide *more effective* solutions to congested parts of the road network” (4-16).

Alternatives 2 and 3 are advocated for in the assessment of alternative 5, which says:

- “investment in Sydney’s strategic road network can be sustainable *if* complemented by strategies to manage congestion and environmental impacts, and should be undertaken in tandem with investment in public transport and demand management measures.” (4-31)

Section 4.3 acknowledges that “Travel demand management [would] reduce the impacts of road traffic on Sydney’s road network.” (4-27)

The EIS, in their cursory “consideration” of these alternatives finds each *alone* to be lacking. But it does not consider the possibility that a combination of alternatives may be effective, or more effective than the project as proposed.

The EIS actually acknowledges that the project does not meet its objectives. The EIS claims that the project plus possible future projects will meet the objectives, but this is a statement of faith – completely unsupported by objective evidence.

Approving this EIS would be maladministration, and a breach of the Department of Planning’s obligations to the people of the State of NSW.

The EIS should be extended to consider whether some combination of improvements to Arterial Roads, Investment in Alternative Transport Modes, and Demand Management might be more cost effective than westCONnex.

Cost Benefit

The EIS does not estimate either the incremental benefit of each alternative, or the cumulative benefit of all of the alternatives.

The EIS does not present a cost benefit analysis. Instead, it relies on cost benefit modelling allegedly contained in the 2015 *WestConnex Updated Strategic Business Case*:

“The benefit cost ratio for the project alone identified in the WestConnex Updated Strategic Business Case is 2.38:1 when the wider economic benefits of the project are not taken into consideration. When the wider economic benefits are considered, the benefit cost ratio is 2.94:1.” (3-19)

These figures are not to be found in the *WestConnex Updated Strategic Business Case*. The documents contain only a claimed BCR of 1.71 (higher with WEB) for the whole WestConnex and no breakdown of the benefits attributable to each stage.

However, even that overly-optimistic BCR of 1.71 has been called into question.

If the figure of 2.94:1 were an accurate reporting of the benefit attributable to Stage 3, then this would indicate almost the entire benefit claimed for the project is approximately the same as the benefit attributed to Stage 3, meaning that Stages 1 and 2 individually have negligible benefit.

This should have been disclosed when those Stages were assessed.

Since the 2015 business case, it has been revealed that the benefits of WestConnex were overstated and that costs were underestimated. See, for example, [http://www.smh.com.au/nsw/pressure-builds-on-state-government-to-sweeten-westconnex-](http://www.smh.com.au/nsw/pressure-builds-on-state-government-to-sweeten-westconnex-20171015)

[sale-20171005-gyur5w.html](https://www.thewest.com.au/politics/docs-reveal-another-westconnex-blowout-ng-s-1758300) and [https://thewest.com.au/politics/docs-reveal-another-westconnex-blowout-ng-s-1758300.](https://thewest.com.au/politics/docs-reveal-another-westconnex-blowout-ng-s-1758300))

This means that the benefits of Stage 3 are actually lower than 2.94, and that the benefits of Stage 1 and Stage 2 are also lower – less than the costs attributable to each stage.

The *WestConnex Updated Strategic Business Case* says that “[t]he significant jump in benefits in the year 2023, is representative of the increased scale of benefits being ‘unlocked’ by the opening of the M4-M5 tunnel link (Stage 3).” (KPMG-43).

However, the *WestConnex Updated Strategic Business Case* was based on the assumption that the Sydney Gateway would be completed as part of Stage 2 (KPMG-19):

WestConnex Stage 2	<p>Stage 2 involves a New M5 to duplicate the existing M5. Key components include:</p> <ul style="list-style-type: none">• Upgrade to the existing on and off-ramps at the King Georges Road interchange.• Widening of the existing M5 East surface road to four lanes in each direction, from King Georges Road, Beverly Hills, to just west of Kingsgrove Road, Kingsgrove.• Western tunnel portal located on the M5 East, just west of Kingsgrove Road. Tunnel in close proximity to existing M5 East, before heading north to St Peters.• Eastern portal south of Campbell Road, St Peters, creating the ‘St Peters Interchange’. Once Stage 3 is built, St Peters Interchange will operate as on and off-ramps for the integrated motorway tunnel.• Tunnel stubs to facilitate underground connection with Stage 3.• Surface road works for roads in the vicinity of the St Peters Interchange, including:<ul style="list-style-type: none">• ‘Sydney Gateway’ connecting St Peter Interchange to Airport Drive, near Sydney Airport.• Upgrade of the King George Rd Interchange has already commenced.• Construction of the new M5 tunnel is expected to commence in 2016.
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WestConnex Stage 2 includes Sydney Gateway (Source: *WestConnex Updated Strategic Business Case*)

Therefore, it is safe to assuming the ratio of 2.94:1 (which already needs to be reduced to allow for cost overruns and over-optimistic estimation of benefits) is based not just on Stage 3 being completed, but also on the Sydney Airport Gateway being complete.

The EIS is also explicit that its benefits are dependent on the Sydney Gateway, also known as Airport Link: “For the purposes of this EIS, the Sydney Gateway project is assumed to be completed and open to traffic in 2023.” (4-4).

The Premier has confirmed that the Gateway is “not part of the project”, and never was. ([https://thewest.com.au/politics/docs-reveal-another-westconnex-blowout-ng-s-1758300.](https://thewest.com.au/politics/docs-reveal-another-westconnex-blowout-ng-s-1758300))

This does introduce the question of why the Business Case was based on the assumption that the Gateway was part of the project.

But more importantly, it raises the question of how much of the (supposed) benefit ratio of 29.4:1 is dependent on the Sydney Gateway.

The EIS for Stage 3 reveals that the benefits of Stages 1 and 2 are negligible, less than the cost of construction. It also suggests that the benefits of Stage 3, alone, are negligible.

The EIS must either include the Sydney Airport Gateway and its costs, or else it should exclude the Sydney Airport Gateway and its benefits. To evaluate benefits but not the concurrent costs would represent gross deception and maladministration.

To evaluate benefits but **not** the concurrent costs is a **catastrophic failure** and calls all stages of the WestConnex project into question.

Traffic and transport modelling

There is no statement on the level of accuracy and reliability of the traffic modelling process.

This is a major deficiency and is contrary to the SEARS.

Properly evaluated traffic modelling is essential as there is ample historical evidence of the overly-overoptimistic traffic predictions that were used to “justify” other toll road projects such as the Cross City Tunnel and Lane Cove Tunnel.

Reliance on the strategic traffic model (WTRM) alone amounts to maladministration. The model assumes that routes in the network have the capacity to carry the forecast traffic. However, the heavily congested roads in inner city areas such as Alexandria do not. The WTRM results should therefore have been accompanied by a mesoscopic model. As is, it relies on implausible traffic volumes that exceed the physical capacity of the road links and intersections at numerous key locations.

The modelling process incorporates a non-standard definition of induced traffic (p.45 of Appendix H), as well as a very low percentage of induced demand (0.3%) in light of actual experience. The Value of Travel Time is unpublished. All these assumptions need to be publicly released and subjected to rigorous independent assessment.

Projected traffic volumes

The St Peters / Sydney Park Crown of Thorns Interchange will overwhelm the Mascot road network. As a result traffic levels were “reduced” to fit the modelling.

In order to make the model work, traffic that exceeds the free flow capacity of the network was reassigned to hours outside of the peak – i.e. the model assumes people shift the time they travel. However, the potential of shifting journey times to reduce overall traffic demand is not considered, especially considering the working hours of most commuters to the industrial and warehousing businesses in the areas of Mascot, Waterloo, Beaconsfield and Alexandria.

The modelling has thousands of unreleased cars at key locations; i.e. in reality those unreleased vehicles would result in vehicle queues and/or network failure.

The key intersection performance tables in App H (p.258) 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

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

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

The congestion in the St Peters network will also make the local bus network dysfunctional. Bus schedules in this area are already unreliable due to congestion; the EIS shows this will only worsen.

Impacts on surrounding road network and required upgrades not provided

The EIS notes that an 'Operational Traffic Performance Review' will be undertaken at twelve months and at five years after the M4-M5 Link is open to consider the need for "post-opening mitigation measures" (Page 223, Chapter 9.8, Appendix H).

I object to this approach as it is contrary to the requirements of the EIS process which should consider all aspects of the project as a whole. To do otherwise represents planning by stealth and deception.

The nature of these "post-opening mitigation measures" are not specified and their impacts could be significant, including: intersection and road widening (and associated property loss), banning parking in local centres; the removal of trees, footpaths and cycling facilities.

The residents of Alexandria have a reasonable expectation to understand whether such impacts form part of the project and they should be detailed in the EIS. They should not be left to a "wait and see" approach. Not only a proper analysis of demand, but also of traffic dispersion should be provided for connecting roads up to three kilometres from every exit and entry portal and the capacity of those roads analysed.

The cost of any such "network integration" works should very clearly be attributed to the project cost, and should not impact on the available RMS budget for the State road network normal maintenance and improvement budget.

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.

Air quality

Scientists have found that there is no safe level of air pollution. This is not only a personal tragedy for those directly affected, but also represents an increased burden on our health system. A thorough cost-benefit analysis that takes into account the health effects due to increased exposure is required.

Concentrations of some pollutants PM_{2.5} and PM₁₀ are already near the current standard and in excess of proposed standards (p9-81, p9-93). 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.

The EIS states that the impact on regional air quality is minimal and thus concludes that the project's impact on ozone is negligible. Ozone is a major pollutant, affecting Western Sydney as well. Previous environment departments have spoken about the need for an eight-hour

standard concentration and goal for ozone (DECCEW, 2010, State of Knowledge: Ozone). OEH needs to provide information about the value of this standard and on the impact of new motorways on that level.

The EIS should not be approved until an independent scientifically qualified reviewer has analysed the stated air quality outcomes and identified any deficits

The Crown of Thorns St Peters interchange is of particular concern to the residents of Alexandria.

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

Carbon pollution

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

The assessment states that there will be a net increase in GHG emissions in 2023 under the 'with project' scenario, however under the 2023 'cumulative' scenario, there will be a net decrease in emissions (page 22-15). However, as the 'cumulative' scenario includes the Sydney Gateway and Western Harbor Tunnel projects, which are not yet confirmed to proceed, 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 an omission, 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.

Community complaints during construction

The EIS states that a Construction Traffic and Access Management Plan (CTAMP) *"would be developed in consultation with local Councils and stakeholders associated with public facilities adjacent to project site"*.

However, the record to date is that communities – including residents in Alexandria – have not had their complaints fairly dealt with. When issues are raised, Sydney Motorway Corporation and Roads and Maritime Services each deny responsibility and blame each other for a lack of action.

Moreover, undertakings which these organisations enter into are not necessarily honoured. As a result the community has no effective avenue for complaints to be resolved. A better system needs to be devised for this project to safeguard communities and preserve our democratic rights. This has to be guaranteed before project approval.

The performance of both the Sydney Motorways Corporation and the Roads and Maritime Services have been unreliable and untrustworthy.

Sydney Gateway/Sydney Airport

The EIS states that the project will improve connection to the Sydney Airport and Port Botany.

It will not.

Without the Sydney Gateway, which is not part of this proposal, the traffic figures in the EIS show that network performance around the Sydney Interchange will either not improve significantly or actually worsen. The M4-M5 link is reliant on a road which is unfunded and whose route has not been finalised.

Boundaries of the study area

The boundaries of the areas of operational modelling are too narrow to fully assess the Project's impacts on Alexandria, as well as key strategic centres such as the Sydney Central Business District. The St Peters operational model (Fig 8-6) does not, for example, cover the full length of Mitchell Rd or Euston Rd, and does not reach Fountain Street or McEvoy Street. This means that the Alexandria community is not able to judge the effects of the project on local streets. Impacts on local streets need to be modelled as part of the EIS.

Land use and property

Increased traffic on local roads will decrease residential amenity and decrease the potential for new higher density housing. This will affect numerous streets, with particularly major impacts on streets in Alexandria: Euston Road, McEvoy, Botany, Wyndham Streets.

Urban design and amenity

The St Peters Active Recreation Area is of no value to the community. Sited around a ten-storey high motorway, the Crown of Thorns Interchange and in proximity to pollution stacks, it does not increase the amenity of our local area.

Increased traffic cannot be accommodated in our area, or in Central Sydney. It will further impede pedestrian movement and comfort and undermine easy access to public transport and reduce access to jobs over large areas of the city.

Modelling

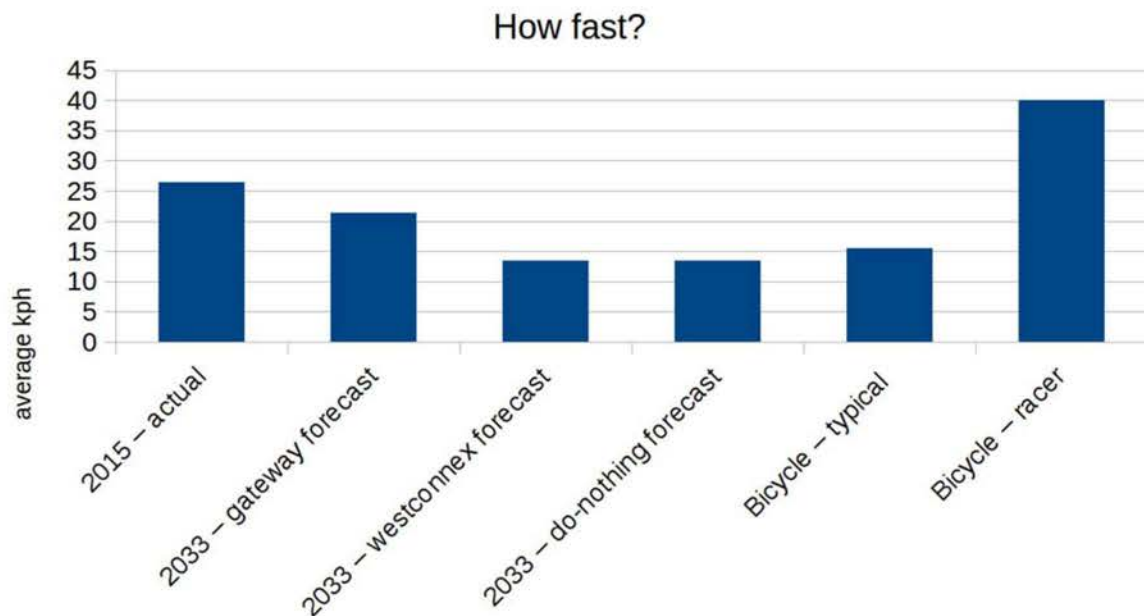
The SEARs require that "The Proponent must assess (and model) the operational transport impacts of the project" (Outcome 2, Traffic and Transport, Requirement 2).

The EIS does not do this. The assessment that is presented is incomplete.

The model does not accommodate the forecast traffic, and the network upon which the recommendation to proceed is based, is not the network proposed in the EIS.

The EIS shows that current average peak speed in the network around St Peters during the AM and PM peak hours is around 27kph (26.8kph in AM Peak, Table 8-13; 26.1kph in PM Peak, Table 8-14). With the Airport Gateway (which is not part of this project) speed is forecast to drop to about 22kph (Tables 12-21 and 12-22). Without the Gateway, whether or not WestConnex is built, speed is forecast to drop to about 12kph (Tables 10-25 and 10-26). By way of comparison, an average cyclist can manage 15.5kph – and a serious cyclist a lot more than that.

However, the modelling behind this forecast is incomplete. The modelling does not resolve all 'unreleased vehicles'. An unreleased vehicle is one that could not enter the modelled network because of congestion – it is either stuck in a driveway, unable to exit, or stuck in a queue of traffic at the border of the network.



St Peters Interchange Network under various scenarios (Source: Appendix H)

The presence of unreleased vehicles indicates that the model shows some vehicles are moving while others are completely gridlocked and remain so until the end of peak hour.

In other words, the network is not coping. The EIS acknowledges this:

- "the network is forecast to not be able to accommodate the forecast traffic demand" (H-196)
- "the forecast one hour future demand would exceed the physical road capacity" (H-53)
- "the demand growth forecast by the WRTM in the 'with project' scenarios caused the operational models to become inoperable" (H-53)

In order to make the model 'operable', RMS assumed demand management: "peak hour demand was therefore reduced in the 'with project' scenarios" (H-53).

This is unacceptable meddling in the performance of the models and clearly calls their results into question. It has all the appearance of fudging the model in order to obtain results designed to bolster arguments in favour of pre-conceived project outcomes.

It smacks of dishonesty.

The EIS (4-27) lists the following examples of demand management:

- Land use planning policies;
- increasing the capacity of the public transport network;
- integrating urban regeneration around transport nodes;
- restrict parking;
- 'time of day' tolling, and
- transport pricing.

While each different form of demand management has very different associated costs and benefits, the EIS does not disclose which demand method was used, or which method will be used for the remaining unreleased vehicles.

RTA guidelines were that "the percentage of unreleased vehicles must be equal to zero for the base model at the end of the simulation period." (Paramics Microsimulation Modelling, RTA Manual.)

However, the model presented contains unreleased vehicles, which is to say that it only accommodates a proportion of the expected traffic, indicating that either the modelled speeds are higher than the real speeds will be, and/or that there will have to be a higher than modelled level of demand management.

The EIS acknowledges that the "With Project" scenario is no better than the "Without Project" scenario.

The EIS makes the unsupported claims that, if a route and budget could be found for the Sydney Airport Gateway, performance would be better, but acknowledges there would still be insufficient capacity to prevent 'Unreleased vehicles' (gridlock).

Capacity constraint is, of course, the ultimate form of demand management. If driving is too difficult, people will find other options, and the EIS acknowledges this:

"It should also be noted that capacity constraint can be used as a demand management technique, which discourages car travel and that conversely, over-provision of capacity can encourage more car use." (H-46)

In addition, when calculating intersection performance, congestion was assumed away:

"For the purpose of analysing intersection performance in this assessment, all exit blocking constraints, applied in the microsimulation models to reflect network congestion beyond the modelled network extents, were removed. This allows for an assessment of the intersections within the modelled network, irrespective of any downstream queuing that would mask the actual operation of the intersection." (8-17)

In other words, the EIS only reports on how intersections would perform if the network were not as congested as it would be under this proposal.

It should be remembered that during the M4 and M5 evaluations, limitations were acknowledged but the M4 M5 Link was going to address all those limitations. Now it seems that, as in some giant Ponzi scheme, all the problems that this stage was supposed to address will instead be fixed in the next stage. Or will there be stages after that?

Network performance around the other portals is similar to St Peters. Average speeds are lower than they currently are, and are not improved by building the project as proposed. The claim is made that performance can be improved by proposed extensions, beyond the scope of this project, but no evidence or costings are provided.

And this all matters because these portals are the end destination of the M4 and M5. Traffic will need to enter or exit the WestConnex at one of these portal, but the modelling says will that vehicles will be blocked from entering these networks: vehicles will be gridlocked in tunnels, with all that implies for human health and safety.

According to the modelling presented, the M4 M5 Link cannot achieve its objectives.

The EIS should not be evaluated, let alone approved, until modelling can be computed that does not demonstrate 'unreleased vehicles'. It would be acceptable for this to be achieved through 'demand management', but only if that demand management is of a specified form, to enable the actual costs and benefits of the project to be evaluated.

Conclusion

The EIS says: "Without infrastructure investment or significant changes to how people travel, the continued demand and use of these corridors would result in additional, prolonged congestion." (4-28)

This is true. However, the EIS does not demonstrate that the infrastructure proposed will do much, if anything, to prevent congestion. There are other transport modes and transport options.

They must be explored and assessed fairly and independently.

Building roads has not reduced congestion anywhere else in the world, and current practice shows that roads are being replaced by other transport modes, especially rail-based options.

This EIS does nothing to suggest that this road will be the exception.

Approving this EIS would be maladministration, and a breach of the Department of Planning's obligations to the people of the State of NSW.



Gary Speechley

From: [REDACTED]
Sent: Mon, 16 Oct 2017 03:04:21 +0000
To: [REDACTED]
Subject: FW: Submission Details for Sue Lewis (object)
Attachments: 228090_Submission to WestConnex Stage 3 EIS 161017_2017Oct16_1401.pdf

From: system@acelo.com On Behalf Of Sue Lewis
Sent: Monday, 16 October 2017 2:02:07 PM (UTC+10:00) Canberra, Melbourne, Sydney
Subject: Submission Details for Sue Lewis (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Sue Lewis
[REDACTED]

Address:
[REDACTED]

Rozelle, NSW
2039

Content:
 SUBMISSION OF OBJECTION TO WESTCONNEX
 Stage 3 (M4/M5 LINK) EIS.
 Project# SS116_7485

As a resident directly affected by the WestConnex stage 3 proposal, 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 following grounds. My concerns are-

Design.

- o Design is indicative only, lacks sufficient detail, therefore it is questionable whether the EIS will be relevant to the final design.
- o The constant shifting of the scope of the project undermines the design clarity, with additional components added or withdrawn as Sydney Motorways Corporation attempts to find cost effective solutions to traffic flow and construction issues as they arise, including issues such as Iron Cove portal, Sydney Airport Gateway and West harbor tunnel. This is planning on the run which will result in unreliable outcomes.

Objectives

- o The EIS states that the project will improve connection to the Sydney Airport and Port Botany. It will not.
- o 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.
- o The EIS asserts that WestConnex will be a catalyst for urban renewal along major corridors. No evidence is provided to back this assertion. The Sydney experience suggests that roads don't - this is not a likely catalyst e.g. Canterbury Road after M5 East; Cumberland Highway corridor after the M7.

Business case.

- o Misrepresentation of the Benefit Cost Ratio (BCR) as 1.71 when it was 1.64.
- o The Business Case did not identify Stage 3 WestConnex, connecting the M4 to the M5, as a priority for "filling in the missing links in Sydney's motorway network".

- o The transport modelling is likely to have underestimated the impact of extra traffic induced by the additional capacity, which would significantly reduce the BCR.
- o Insufficient justification was provided for the significant travel time savings, and economic benefits, factored into the BCR for business and light commercial vehicles - for instance there was insufficient analysis of origins and destinations of these trips.
- o The construction costs appear too conservative - if these increase, the BCR would reduce accordingly.
- o Other costs were not accounted for, such as
 - o reduced amenity on urban development,
 - o loss of land for higher value activities, and
 - o the health costs of potentially reduced public transport use.

Traffic

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

Air quality

- o The ventilation stack proposed at the Iron Cove bridge portal suggested location is unacceptably close to Rozelle Public School and residences either side of Victoria Rd, Rozelle between Iron Cove and Darling St.
- o The Rozelle interchange has an unprecedented concentration of stacks, in a valley, adjacent to densely populated suburbs. The interchange has steep and long climbs, increasing emissions concentrations, which will then be pumped into the surrounding area. The modelling does not account for stop-start conditions. However, the EIS shows significant traffic volumes heading onto the Anzac Bridge, which already operates at the lowest Level of Service (F) in peak times. There will be significant queues heading into the tunnels, greatly increasing the level of emissions.

Alternatives

- o Real integrated transport measures must be assessed. 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."
- o The Secretary's Environmental Assessment Requirements (SEARS) require analysis of feasible alternatives to the project. No feasible alternatives have been developed and no objective analysis of alternatives has been undertaken. While Section 4.4 of the EIS purports to cover Strategic Alternatives, it does little more than offer a discussion of why an alternative was not pursued.

NSW Planning must require the Proponent to properly and adequately address the impacts indicated above 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.

Yours sincerely

Sue Lewis
02 98187873

Submission: Online Submission from Sue Lewis (object)
https://majorprojects.accelo.com/?action=view_activity&id=228090

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

Site: #3247 M4-M5 Link

https://majorprojects.accelo.com/?action=view_site&id=3247

Sue Lewis
44 Waterloo St
Rozelle
NSW 2039
16th October 2017

SUBMISSION OF OBJECTION TO WESTCONNEX

Stage 3 (M4/M5 LINK) EIS.

Project# SSI16_7485

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- **Misrepresentation** of the Benefit Cost Ratio (BCR) as 1.71 when it was 1.64.
- The Business Case did not identify Stage 3 WestConnex, connecting the M4 to the M5, as a priority for “filling in the missing links in Sydney’s motorway network”.
- The transport modelling is likely to have **underestimated the impact of extra traffic** induced by the additional capacity, which would significantly reduce the BCR.
- Insufficient justification was provided for the significant travel time savings, and economic benefits, factored into the BCR for business and light commercial vehicles – for instance there was **insufficient analysis** of origins and destinations of these trips.
- The construction costs appear too conservative – if these increase, the BCR would reduce accordingly.
- **Other costs were not accounted for**, such as
 - reduced amenity on urban development,
 - loss of land for higher value activities, and
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- The traffic modelling process used to develop the Project is fundamentally flawed because:
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- The Rozelle interchange has an unprecedented concentration of stacks, in a valley, adjacent to densely populated suburbs. The interchange has steep and long climbs, increasing emissions concentrations, which will then be pumped into the surrounding area. The modelling does not account for stop-start conditions. However, the EIS shows **significant traffic volumes** heading onto the Anzac Bridge, which already operates at the lowest Level of Service (F) in peak times. There will be significant queues heading into the tunnels, greatly increasing the level of emissions.

Alternatives

- Real integrated transport measures must be assessed. 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."
- The Secretary's Environmental Assessment Requirements (SEARS) require analysis of feasible alternatives to the project. **No feasible alternatives** have been developed and no objective analysis of alternatives has been undertaken. While Section 4.4 of the EIS purports to cover *Strategic Alternatives*, it does little more than offer a discussion of why an alternative was not pursued.

NSW Planning must require the Proponent to properly and adequately address the impacts indicated above 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.

Yours sincerely

Sue Lewis

Sue Lewis

02 98187873

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:

ANN CUDDY

Signature:

Ann Cuddy

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:

3 BRIDGE ST

Suburb:

ERSKINEVILLE

Postcode

2043

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

- o I do not consider it acceptable that cycling/pedestrian routes should be changed for four years in Annandale and Rozelle in ways that will make cycling more difficult and walking less possible for residents with reduced mobility. These are vital community transport routes.
- o 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.
- o 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.
- o The EIS refers to be construction impacts as being 'temporary'. I do not consider a five year construction period to be temporary.
- o 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.
- o 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 needs to detail the increased risk in crashes that will be caused by the additional 170 vehicles a day that are proposed to enter and leave Darley Road during the construction period.
- o 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.

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>ANN CUDDY</u>	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature: <u>Ann Cuddy</u>	Attn: Director – Transport Assessments
Please include my personal information when publishing this submission to your website Declaration: I HAVE NOT made any reportable political donations in the last 2 years.	Application Number: SSI 7485 Application
Address: <u>3 BRIDGE ST</u>	Application Name: WestConnex M4-M5 Link
Suburb: <u>ERSKINEVILLE</u> Postcode: <u>2043</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.

- i. The volume of extra heavy traffic in the Rozelle area and the acknowledged impact this will have on local roads is completely unacceptable to me.
- ii. The social and economic impact study fails to record the great concern for valued Newtown heritage
- iii. 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.
- iv. The consultants for the Social and Economic Impact study is HillPDA. This company has a conflict of interest and is not an appropriate choice to do a social impact study of WestCONnex. Amongst its services it offers property valuation services and promotes property development in what are perceived to be strategic locations. HillPDA were heavily involved in work leading to the development of Urban Growth NSW and the heavily criticised Parramatta Rd Study. It is not in the public interest to use public funds on an EIS done by a company that has such a heavy stake in property development opportunities along the Parramatta Rd corridor. One of the advantages of property development along Parramatta Rd that Hill PDA promotes on its website is the 33 kilometre WestCONnex.
- v. The EIS acknowledges that extra construction traffic will add to travel times across the Inner West and have a negative impact on businesses in the area. No compensation is suggested. These impacts are not been taken into account of evaluating the cost of WestCONnex.
- vi. The EIS acknowledges that 'rat running' by cars to avoid added congestion and delays caused by construction traffic will put residents at risk. No only solution is a Management Plan, which is yet to be developed, and to which the public will have no impact. This is completely unacceptable.
- vii. The EIS refers to be construction impacts as being 'temporary'. I do not consider a five year construction period to be temporary.
- viii. Table 6.1 in Appendix Q (Social and Economic impact) is not an accurate report on the concerns of residents. It downgrades the concerns of Newtown, St Peters and Haberfield residents. It does not even mention concerns about additional years of construction in Haberfield and St Peters. It also does not mention concerns about heritage impacts in Newtown. I can only assume that this is because there was almost no consultation in Newtown and a failure to notify impacted residents including those on the Eastern Side of King Street and St Peters.

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Name _____ Email _____ Mobile _____

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <i>ANN CUDDY</i>
	Address: <i>3 BRIDGE ST</i>
Application Number: SSI 7485	Suburb: <i>ERKO</i> Postcode <i>2043</i>
Application Name: WestConnex M4-M5 Link	Signature: <i>A Cuddy</i>
Please include my personal information when publishing this submission to your website Declaration: I HAVE NOT made any reportable political donations in the last 2 years.	

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

- The EIS admits that air pollutants will exceed permitted levels along the Canal Rd used to access the St Peters Interchange because the traffic will be heavier. This is an unacceptable impact which will adversely affect vehicle users because it is known that people in their vehicles are not protected from the air pollution, as well as anyone on foot or cycling in the streets around the interchange. No amelioration is offered.
- The EIS states that traffic congestion around the St Peters Interchange is expected to be worse after completion of the M5 and the M4-M5 Link particularly in the evening peak hour. The EIS admits that this will have a "moderate negative" impact on the neighbourhood in increasing pollution (also admitted separately) therefore in health impacts, on safety for foot and cycle traffic but also for vehicles and on the local amenity.
- The traffic around St Peters expected to be heavier because of the increased road access to the new Interchange will adversely affect our community because moving around to our parks and to the shops, to the buses and to the train stations, for pedestrians and cars, will be more difficult. Our community is being sacrificed for the marginal improvement in traffic movement elsewhere in Sydney. No measures to ameliorate the impact are mentioned. This is unacceptable.
- The EIS 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.
- It is obvious the NSW government is in a desperate rush to get planning approval for the M4/M5. It has only allowed 60 days for comment yet the M4/M5 project is the most expensive and complicated stage of WestConnex. Critically, it involves building three layers of underground tunnels under parts of Rozelle. Such tunnelling does not exist anywhere in the world and as yet there are no engineering plans for this complex construction. Approval depends on senior staff in NSW Planning compliantly agreeing to tick off on the EIS, as was done with the New M5 and the M4. This demonstrates a wanton disregard for the safety of the residents of Rozelle and those who will be using the tunnel. WHAT IS THE RUSH?

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Submission to : Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: ANN CUDDY Signature: A Cuddy
Attention: Director – Transport Assessments	Please include my personal information when publishing this submission to your website Declaration : I HAVE NOT made any reportable political donations in the last 2 years.
Application Number: SSI 7485 Application Name: WestConnex M4-M5 Link	Address: 3 Bridge St Suburb: Enko Postcode 2043.

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

- ❖ 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.
- ❖ 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.
- ❖ 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.
- ❖ The EIS does not provide appropriate parking for the estimated 100 or so workers that the EIS states will work every day at the site, while other equivalent sites have allocated parking for such workers (Northcote Civil site (150)) and Parramatta Road East Civil site (140). It is also noted that the EIS provides for loss of 20 residential parks on Darley Road. Local streets are at capacity already because of the lack of off-street parking for many residents and the Light Rail stop which means that commuters use local streets. The EIS states that workers ‘will be encouraged to use public transport.’ the EIS needs to mandate that no trucks or construction vehicles are to park in local streets. There needs to be a requirement that is enforceable that workers use the Light Rail stop which is adjacent to the site or a plan to bus in workers
- ❖ Streets in Haberfield would be subject to heavy vehicle traffic for a further four years, making at least 7 years of heavy impacts on a single suburb. The answer is not a “community strategy”. Residents who believed that their pain would be over after the M4 east are now being asked to sustain a further four years of impacts. No compensation or serious mitigation is suggested.
- ❖ The EIS does not require an acoustic shed and states that ‘Acoustic barriers and devices at the access tunnel entrances would be considered and implemented where reasonable and feasible to minimise potential noise impacts associated with out-of-hours works within the tunnels.’

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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: ANN CUDDY

Signature: Ann Cuddy

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Address: 3 Bridge St

Suburb: Erskineville Postcode: 2043

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 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.
- ⇒ 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.
- ⇒ 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.
- ⇒ 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.
- ⇒ The EIS states that Darley Road is a contaminated site, likely including asbestos. There is a risk to the community associated with spoil removal, transfer and handling. We object to the selection of the site based on the environmental risks that this creates, along with risks to health of residents.
- ⇒ The EIS states that property damage due to ground movement may occur. We object to the project in its entirety on this basis. The EIS states that 'settlement, induced by tunnel excavation, and groundwater drawdown, may occur in some areas along the tunnel alignment'. The risk of ground movement is lessened where tunnelling is more than 35 metres. However,

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

- ⇒ There is a higher than average number of shift workers in the Inner West. The EIS acknowledges that even allowing for mitigation measures such as acoustic sheds and noise walls, shift workers will be more vulnerable to impacts of years of construction work and will consequently be at risk of a loss of quality of life, loss of productivity and chronic mental and physical illness.
- ⇒ I am completely opposed to approving a project in which the Air quality experts recommend rather than filtrating stacks extra stacks could be added later.
- ⇒ 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.

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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: ANN CUDDY

Signature: Ann Cuddy

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

Address: 3 BRIDGE ST

Suburb: ERSKINEVILLE Postcode: 2043

Submission to:

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

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

- ◆ It is outrageous to suggest that four unfiltered stacks would be built in one area, Rozelle
- ◆ The EIS states that after the M4-m5 opens, that traffic on Darley Road will increase by 4%. There is no benefit in the overall project for residents. During construction westbound traffic will increase on Darley Road by 37%. This increase in traffic for a period of up to five years will make it hazardous to cross the road and access the light rail and travel to Blackmore oval, the bat run, the dog park and the Leichhardt pool. In addition, it will drastically increase both local traffic and outer area traffic at peak commute times. We therefore object to the location of this site based on the unacceptable traffic impacts it will have on road users and on residents.
- ◆ 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.
- ◆ 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.
- ◆ 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.
- ◆ 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.

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Submission to : Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <i>Ann Cuddy</i> Signature: <i>ANN CUDDY</i>
Attention: Director – Transport Assessments	<i>Please <u>include</u> my personal information when publishing this submission to your website</i> <i><u>Declaration</u> : I HAVE NOT made any reportable political donations in the last 2 years.</i>
Application Number: SSI 7485 Application Name: WestConnex M4-M5 Link	Address: <i>3 BRIDGE ST</i> Suburb: <i>ERSKINEVILLE</i> Postcode <i>2043</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

- The EIS contains no detail of the access tunnel from the Darley Road site to the mainline tunnel other than depicting the route. The approval conditions need to ensure that tunnelling is occurring at sufficient depth so as to not jeopardise the integrity of the homes and not create unacceptable vibration and noise impacts for James Street residents and those at adjacent streets. The approval conditions need to make clear the period of time for which the 'temporary' tunnel is to be used.
- The EIS states that 'a preferred noise mitigation option' would be determined during 'detailed design'. This is unacceptable and residents have no opportunity to comment on the detailed designs. The failure to include this detail means that residents have no idea as to what is planned and cannot comment or input into those plans. (Executive Summary xvi)
- The EIS social and economic impact study acknowledged the high value placed on retaining trees and vegetation in the affected area but does not mention that WestConnex has already destroyed more than 1000 trees in the St Peters Alexandria area around Sydney Park alone.
- Light construction vehicle routes – the EIS acknowledges that these vehicles will use 'dispersed' routes (8-62). In other words, construction vehicles will use and park on local roads. The EIS does not propose any management as to which roads they use. The addition of 70-100 light vehicle movements day in Leichhardt will result in our small, congested streets, which are already at capacity and suffering parking shortages, will have the added impact of workers travelling to and from the site and parking in local streets. There will be rat running. The EIS should provide an agreed route (using arterial roads only) that can be used by all vehicles associated with the project.
- 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.

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Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <u>ANN CUDDY</u>
	Address: <u>3 BRIDGE ST</u>
Application Number: SSI 7485	Suburb: <u>ERSKINEVILLE</u> Postcode <u>2043</u>
Application Name: WestConnex M4-M5 Link	Signature: <u>Ann Cuddy</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:


- ◇ The EIS states that 'reasonable and feasible work practices and mitigation measures would be implemented to minimise potential noise impacts due to activities occurring at the Darley Road civil and tunnel site.' 96-52) This is not good enough. The EIS does not contain any detail whatsoever of these proposal on which they can comment. In addition, there is no requirement that measures will in fact be introduced to address noise impacts. The approval conditions need to contain detail of specific noise mitigation measures that are mandated and can be enforced.
- ◇ Leichhardt residents were repeatedly told by SMC that the Darley Road site would be operational for three years. The EIS states that it will be operational for 5 years. This creates an unacceptable impact for residents. The works on the site should be restricted to a three-year program as was promised.
- ◇ The volume of extra heavy traffic in the Rozelle area and the acknowledged impact this will have on local roads is completely unacceptable to me.
- ◇ Table 6.1 in Appendix Q (Social and Economic impact) is not an accurate report on the concerns of residents. It downgrades the concerns of Newtown, St Peters and Haberfield residents. It does not even mention concerns about additional years of construction in Haberfield and St Peters. It also does not mention concerns about heritage impacts in Newtown. I can only assume that this is because there was almost no consultation in Newtown and a failure to notify impacted residents including those on the Eastern Side of King Street and St Peters.
- ◇ Heavy vehicle movements during peak hours – Leichhardt. The EIS states that 'reasonable and practical management strategies would be investigated to minimize the volume of heavy vehicle movements during peak hours.' (8-53). This is also not acceptable as it is not known what will actually be done to manage this impact. It is not good enough for the EIS, which forms the basis of the approval of this project, to simply mention 'investigations' and not detail a proper plan (on which residents can comment) on management of heavy vehicle movements during peak hours. In addition, Darley Road is very congested from 7am until 9.30am and then from 4pm-6.30pm, well outside the 'peak' periods identified in the EIS. And the impact on traffic will be caused by 'light' vehicles and not simply heavy vehicles. It is clear that there is no plan for managing these vehicle movements. The EIS should not be approved as drafted. It is unacceptable for this volume of vehicles to be proposed for this critical arterial road with no plan for management

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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: ANN Cuddy

Signature: 

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Address: 3 BRIDGE ST

Suburb: ERSKINEVILLE Postcode 2043

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

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

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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: ANN CUDDY

Signature: Ann Cuddy

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GPO Box 39, Sydney, NSW, 2001

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Application Name: WestConnex M4-M5
Link

- ✦ The EIS states that there are 'investigations' occurring into alternative access to the Darley Road site. The EIS does not provide any detail on which residents can comment about alternative access which would keep trucks off Darley Road. No spoil truck movements should be permitted on Darley Road and the plans for alternative access should be expedited. It should be a condition of approval that the alternative access is confirmed and that no spoil trucks are permitted to access Darley Road due to the unacceptable noise, safety and traffic issues that the current proposal creates
- ✦ I strongly object to the proposed location of this permanent operational facility on Darley Road. The presence of this site contradicts repeated assurances to the community that the site would be returned after construction was completed. The ongoing presence of this site will limit future uses of the darley Road site which could serve community purposes, particularly given its location directly next to public transport. Its presence removes the ability to provide more accessible, safer and direct pedestrian access to the North Leichhardt Light Rail Station. The plant location, in a neighbourhood setting is not appropriate. It will reduce property values and have an unacceptable impacts on the visual amenity of the area. The streets adjacent to Darley Road are comprised of low-rise residential homes and small businesses and infrastructure such as this should not be permitted in such a location.
- ✦ The EIS claims to have saved Blackmore Park and Easton Park due to negative community feedback. I am concerned that this is a false claim and that this site was never really in contention due to other physical factors. I would like NSW Planning to investigate whether this claim is correct to have heeded the community is false or not.
- ✦ The EIS acknowledges that 'rat running' by cars to avoid added congestion and delays caused by construction traffic will put residents at risk. No only solution is a Management Plan, which is yet to be developed, and to which the public will have no impact. This is completely unacceptable.
- ✦ Traffic operational modelling – Leichhardt. The EIS does not provide any operational modelling for the Darley Road area (8-11), despite the fact 170 vehicles a day are proposed to enter this highly congested (during peak hours) area. Darley Road is a critical arterial road for commuters accessing the City West Link and this analysis should be provided so that impacts can be properly assessed.
- ✦ Removal of vegetation – Leichhardt. The EIS states that all vegetation will be removed on the Darley Road site. There are several mature trees located on the north of the site. None of these trees should be removed as they provide precious greenery. They also act as a visual and noise screen for residents from the City West Link traffic. All efforts should be taken to retain the trees and the EIS should not simply permit these trees to be removed without proper investigations being undertaken as to how they can be retained. If they are removed following a proper investigation and consideration of all options, then the approval needs to specify that all streets are replaced with mature, native trees at the conclusion of the construction at the site.

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

Name _____ Email _____ Mobile _____

Attention Director

Application Number: SSI 7485

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

Application Name: WestConnex M4-M5 Link

Name:

ANN CUDDY

Signature:

Ann Cuddy

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:

3 BRIDGE ST

Suburb:

ERSKINEVILLE

Postcode

2043

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

- ◆ 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.
 - ◆ It is outrageous to suggest that four unfiltered stacks would be built in one area in Rozelle
 - ◆ The Air quality data is confusing and is not presented in a form that the community can interpret. The lack of clarity leads to a suspicion that areas of concern are being covered up.
 - ◆ Traffic diversions – Leichhardt. The EIS states that 'temporary diversions along Darley Road may be required during construction' (8-65). No detail is provided as to when these diversions would occur; there is no provision for consultation with the community; no detail as to how long the diversions will be in place and no comment on the impact of diversions on local roads or the amenity of residents.
- Will diversions occur at night? If so, down what streets? Diverting the arterial traffic from Darley Road down local streets (which are not designed for heavy vehicle volumes) will result in damage to streets, sleep disturbances for residents and create safety issues. There is also childcare centre and a school near the William Street/Elswick Street intersection which will be impacted by diverting vehicles onto local roads. It is unacceptable for proposed road diversions not to be detailed whatsoever in the EIS. The EIS should not be approved without setting out the impacts of road diversions on residents and businesses.
- ◆ 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 we have fewer parks than almost any suburb in Sydney so this would have a direct impact on local people. Buruwan Park also lies on 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 get 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.

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Attention Director

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

Application Name: WestConnex M4-M5 Link

Name:

ANN CUDDY

Signature:

A Cuddy

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Address:

3 Bridge St

Suburb:

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2043

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

- The EIS needs to require that all workers are bussed in or use public transport such as the light rail with no parking whatsoever permitted on local roads at the Darley Road site. This is justified because the site provides 11 car spaces for an estimated 100 workers a day on site. The project cannot be approved on this basis without a strict requirement on workers to use public transport or project provided transport and a prohibition needs to be in place against parking on local streets. The EIS needs to require that this restriction is included in all contracts and in the relevant approval documentation
- 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 EIS proposes that all trucks will arrive at the Darley Road civil and tunnel site from Haberfield and travel along Darley Road to the site, with a right-hand turn now permitted into James Street. The proposed route will result in a truck every 3-4 minutes for 5 years running directly by the small houses on Darley Road. These homes will not be habitable during the five-year construction period due to the unacceptable noise impacts. The truck noise will be worsened by their need to travel up a steep hill to return to the City West Link, so the noise impacts will affect not just those homes on or immediately adjacent to Darley Road.
- 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.
- The Darley Road site will not be returned after the project, with a substantial portion permanently housing a Motorways Operations facility which involves a substation and water treatment plant. This means that the residents will not be able to directly access the North Light rail Station from Darley Road but will have to traverse Canal Road and use the narrow path from the side. In addition the presence of this facility reduces the utility of this vital land which could be turned into a community facility. Over the past 12 months community representatives were repeatedly told that the land would be returned and this has not occurred. We also object to the location of this type of infrastructure in a neighbourhood setting.
- 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.

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<p>Attention Director Application Number: SSI 7485</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>ANN CUDDY</u></p> <p>Signature: <u>A Cuddy</u></p> <p>Please <u>include</u> my personal information when publishing this submission to your website. I HAVE NOT made reportable political donations in the last 2 years.</p> <p>Address: <u>3 BRIDGE ST</u></p> <p>Suburb: <u>ERKO</u> Postcode <u>2043</u></p>
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I object to the WestConnex M4-M5 Link proposals for the following reasons:

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| <p>A. 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</p> <p>B. The EIS states that spoil haulage hours will be restricted but ignores the fact that the same was promised for the M4 East but these promises have been ignored repeatedly.</p> <p>C. The EIS states "Direct and indirect traffic disruptions are likely to be experienced on local and arterial roads in most suburbs that are in close proximity to construction sites. This would include the suburbs of Ashfield, Haberfield, St Peters, Camperdown, Annandale, Lilyfield, Leichhardt, and Rozelle." Despite this finding, the study then pushes these negative impacts aside as inevitable. There is never any evaluation of whether in the light of the negative impacts an alternative public infrastructure project might be preferable.</p> <p>D. The impacts on The Crescent and Annandale are massive and were not sufficiently revealed in the Concept Design to enable residents to give</p> | <p>feedback on the negative impacts on communities and businesses in the area.</p> <p>E. 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.</p> <p>F. Table 6.1 in Appendix Q (Social and Economic impact) is not an accurate report on the concerns of residents. It downplays concerns of Newtown, St Peters and Haberfield residents. It does not even mention concerns about additional years of construction in Haberfield and St Peters. The raises the question of whether this is a result of the failure of SMC to notify impacted residents including those on the Eastern Side of King Street and St Peters about the potential impacts of the M4 M5</p> <p>G. The EIS identifies a risk to children from construction traffic at Haberfield School. I find such risks unacceptable and am not satisfied with a promise of a Plan to which the public is excluding from viewing or providing feedback until it is published.</p> |
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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:

ANN CUDDY

Signature:

Ann Cuddy

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

Address:

3 BRIDGE ST

Suburb:

ERSKINEVILLE

Postcode

2043

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.

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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: ANN Cuddy

Signature: A Cuddy

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

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

Address: 3 Bridge St

Suburb: Erskineville Postcode: 2043

Submission to:

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

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5
Link

- ◆ There 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 currently permits trucks to access local roads in 'exceptional circumstances', which includes queuing at the site. Given the constraints of the site (and based on experience with cars accessing the site for Dan Murphy's), queuing will be the norm and not the exception. The EIS needs to be amended to rule out queuing as an exceptional circumstance which allows trucks to use local roads
- ◆ 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 identifies a risk to children from construction traffic at Haberfield School. I find such risks unacceptable and am not satisfied with a promise of a Plan to which the public is excluding from viewing or providing feedback until it is published.
- ◆ I object to the location of a permanent substation and water treatment plant following the completion of the project on the Darley Road site. This will limit the future uses of the land and the community has been continually assured that the land, which is Government-owned, would be available for community purposes. The presence of this facility will forever prevent the ability for safe and direct pedestrian access to the light rail stop, with users required to walk down a dark and winding path. It will also limit the future use of the site. If a permanent facility is to be located then it should be moved to the north of the site so that it is out of sight of homes and has less visual impact on residents.
- ◆ 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.
- ◆ I do not consider it acceptable that cycling/pedestrian routes should be changed for four years in Annandale and Rozelle in ways that will make cycling more difficult and walking less possible for residents with reduced mobility. These are vital community transport routes.

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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: ANN CUDDY

Signature: Ann Cuddy

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Address: 3 Bridge St

Suburb: ERSKINEVILLE Postcode: 2043

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.

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Submission from:	Submission to:
Name: <u>ANN CUDDY</u>	Planning Services,
Signature: <u>Ann Cuddy</u>	Department of Planning and Environment
	GPO Box 39, Sydney, NSW, 2001
Please include my personal information when publishing this submission to your website	Attn: Director – Transport Assessments
Declaration : I HAVE NOT made any reportable political donations in the last 2 years.	Application Number: SSI 7485 Application
Address: <u>3 BRIDGE ST</u>	Application Name: WestConnex M4-M5 Link
Suburb: <u>ERSKINEVILLE</u> Postcode: <u>2043</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.**

- Table 6.1 in Appendix Q (Social and Economic impact) is not an accurate report on the concerns of residents. It downplays concerns of Newtown, St Peters and Haberfield residents. It does not even mention concerns about additional years of construction in Haberfield and St Peters. The raises the question of whether this is a result of the failure of SMC to notify impacted residents including those on the Eastern Side of King Street and St Peters about the potential impacts of the M4 M5
- 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.
- 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.
- I am appalled to read in the EIS that more than 100 homes across the Rozelle construction sites will be severely affected by construction noise for months or even years at a time. This would include hundreds of individual residents including young children, school students and people who spend time at home during the day. The predicted levels are more than 75 decibels and high enough to produce damage over an eight hour period. Such noise levels will severely impact on the health, capacity to work and quality of life of residents. NSW Planning should not give approval to a project that could cause such impacts. Promises of potential mitigation are not enough, especially when you consider the ongoing unacceptable noise in Haberfield during the M4East construction.
- I am completely opposed to approving a project in which the Air quality experts recommend rather than filtrating stacks extra stacks could be added later.
- The EIS acknowledges that extra construction traffic will add to travel times across the Inner West and have a negative impact on businesses in the area. No compensation is suggested. These impacts are not been taken into account of evaluating the cost of WestCONnex.

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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:

ANN CUDDY

Signature:

Ann Cuddy

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Address:

3 BRIDGE ST

Suburb:

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Postcode

2043

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

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

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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: ANN CUDDY

Signature: Ann Cuddy

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

Address: 3 BRIDGE ST

Suburb: ERSKINEVILLE Postcode: 2043

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

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

◇ The 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.

◇ 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.

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

◇ The EIS 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 _____

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

Name: ANN CUDDY

Signature: Ann Cuddy

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

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

Address: 3 BRIDGE ST

Suburb: ERSKINEVILLE Postcode: 2043

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 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.
- ◆ 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.
- ◆ 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.
- ◆ The EIS acknowledges that four years of M4/M5 construction would have a negative economic and social impact across the Inner West through interrupted traffic routes, slower traffic times, disruption with public transport, interruption with businesses and loss of connections across communities. This finding highlights the need for a proper cost benefit analysis for the project. Such social costs should not simply be dismissed with the promise of a construction plan into which the community has not input or powers to enforce.
- ◆ The 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.
- ◆ 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.

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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: ANN CUDDY

Signature: Ann Cuddy

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

Address: 3 Bridge St

Suburb: ERSKINEVILLE Postcode: 2043

Submission to:

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

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5
Link

- ◇ I am 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.
- ◇ 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.
- ◇ I am concerned that while hundreds of impacts on resident, including noise, loss of business, dust, and lost time through more traffic congestion, are identified in the EIS, the approach is always to recommend approval and promise vague 'mitigation' in the future. This is not good enough.
- ◇ The EIS indicates that 36 homes will have unacceptable noise impacts for extended periods at the Darley road construction site. The EIS does not mention the cumulative impact of aircraft noise in the Leichhardt or St Peters area, and therefore does not reflect the true impact of construction noise on the amenity of nearby residents and businesses. The noise impacts of construction are not able to be mitigated to an acceptable level and the EIS should not be approved on this basis.
- ◇ 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.
- ◇ 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 impacts on The Crescent and Annandale are massive and were not sufficiently revealed in the Concept Design to enable residents to give feedback on the negative impacts on communities and businesses in the area.
- ◇ 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.

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Name _____ Email _____ Mobile _____

Submission from:	Submission to:
Name: <u>ANN CUDDY</u>	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature: <u>Ann Cuddy</u>	Attn: Director – Transport Assessments
Please include my personal information when publishing this submission to your website Declaration : I HAVE NOT made any reportable political donations in the last 2 years.	Application Number: SSI 7485 Application
Address: <u>3 BRIDGE ST</u>	Application Name: WestConnex M4-M5 Link
Suburb: <u>ERSKINEVILLE</u> Postcode: <u>2043</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.**

- ◇ The site should be returned to the community as compensation for the imposition of this construction site in our neighbourhood for a 5 year period. If the substation and water treatment plant is moved to the north of the site, then the lower half of the site (which is the most accessible end) could be converted into open space with mature trees planted. As this site is immediately adjacent to the bay run, bicycle parking and other facilities that support active transport could be included. This would result increase the green space for residents and result in a pleasant green environment for pedestrians, rather than a fenced facility.
- ◇ Why the so called 'King Street Gateway' been excluded in the analysis of cumulative impacts of other projects ?
- ◇ I am concerned that the AECOM, the company responsible for the EIS, always approves knocking down heritage buildings if the project requires it. It doesn't how much value it holds for the community, it must always be destroyed.
- ◇ No workers associated with the WestConnex project should be permitted to park on local streets. Parking is at a premium in this area and many residents to not have off-street parking. The removal of 20 car spaces for five years as is proposed on Darley Road will worsen this situation as will the removal of 'kiss and ride facilities' at the light rail. There is also a pre-DA application for 120 units on William Street which is not taken into account in the EIS. This will place further stress on parking. The EIS needs to outright prohibit any worker parking on local streets.
- ◇ The 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.
- ◇ 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.

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>ANN CUDDY</u>	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature: <u>Ann Cuddy</u>	Attn: Director – Transport Assessments
Please include my personal information when publishing this submission to your website Declaration : I HAVE NOT made any reportable political donations in the last 2 years.	Application Number: SSI 7485 Application
Address: <u>3 BRIDGE ST</u>	Application Name: WestConnex M4-M5 Link
Suburb: <u>ERSKINE VILLE</u> Postcode: <u>2043</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.

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

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Name _____ Email _____ Mobile _____

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <i>Scott Cansdale</i>
Application Number: SSI 7485	Address: <i>35 / 38-42 Stanmore Road</i> Suburb: <i>Enmore</i> Postcode <i>2042</i>
Application Name: WestConnex M4-M5 Link	Signature: <i>S. White</i>
Please include my personal information when publishing this submission to your website Declaration: I HAVE NOT made any reportable political donations in the last 2 years	

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

- ◇ The EIS states that 'reasonable and feasible work practices and mitigation measures would be implemented to minimise potential noise impacts due to activities occurring at the Darley Road civil and tunnel site.' 96-52) This is not good enough. The EIS does not contain any detail whatsoever of these proposal on which they can comment. In addition, there is no requirement that measures will in fact be introduced to address noise impacts. The approval conditions need to contain detail of specific noise mitigation measures that are mandated and can be enforced.
 - ◇ Leichhardt residents were repeatedly told by SMC that the Darley Road site would be operational for three years. The EIS states that it will be operational for 5 years. This creates an unacceptable impact for residents. The works on the site should be restricted to a three-year program as was promised.
 - ◇ The volume of extra heavy traffic in the Rozelle area and the acknowledged impact this will have on local roads is completely unacceptable to me.
 - ◇ Table 6.1 in Appendix Q (Social and Economic impact) is not an accurate report on the concerns of residents. It downgrades the concerns of Newtown, St Peters and Haberfield residents. It does not even mention concerns about additional years of construction in Haberfield and St Peters. It also does not mention concerns about heritage impacts in Newtown. I can only assume that this
- is because there was almost no consultation in Newtown and a failure to notify impacted residents including those on the Eastern Side of King Street and St Peters.
- ◇ Heavy vehicle movements during peak hours – Leichhardt. The EIS states that 'reasonable and practical management strategies would be investigated to minimize the volume of heavy vehicle movements during peak hours.' (8-53). This is also not acceptable as it is not known what will actually be done to manage this impact. It is not good enough for the EIS, which forms the basis of the approval of this project, to simply mention 'investigations' and not detail a proper plan (on which residents can comment) on management of heavy vehicle movements during peak hours. In addition, Darley Road is very congested from 7am until 9.30am and then from 4pm-6.30pm, well outside the 'peak' periods identified in the EIS. And the impact on traffic will be caused by 'light' vehicles and not simply heavy vehicles. It is clear that there is no plan for managing these vehicle movements. The EIS should not be approved as drafted. It is unacceptable for this volume of vehicles to be proposed for this critical arterial road with no plan for management

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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: Scott CansdaleSignature: S. Cansdale

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: 35/38-42 Stanmore RoadSuburb: EnmorePostcode 2042**I object to the WestConnex M4-M5 Link proposals for the following reasons:**

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

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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: Scott Cansdale

Signature: S. Cansdale

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: 35/38-42 Stanmore Road

Suburb: Enmore Postcode: 2042

Submission to:

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

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5
Link

- ◆ 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.
- ◆ 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.
- ◆ 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.
- ◆ The EIS acknowledges that four years of M4/M5 construction would have a negative economic and social impact across the Inner West through interrupted traffic routes, slower traffic times, disruption with public transport, interruption with businesses and loss of connections across communities. This finding highlights the need for a proper cost benefit analysis for the project. Such social costs should not simply be dismissed with the promise of a construction plan into which the community has not input or powers to enforce.
- ◆ The 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.
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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:

Matthew T. DUNNE

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:

1/83 Enmore Rd

Suburb:

Enmore

Postcode

2092

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) Other planning issues are excluded from cost-benefit analysis, which is a key component of developing a business case:
- ✦ No analysis of equity impacts of the infrastructure investment and the tolling regime, given the lower socio-economic status of many areas of Western Sydney, and the requirement for potential users of WestConnex to own or pay for access to a private vehicle to be able to use it
 - ✦ The localised impact of air quality around the ventilation outlets should have been accounted for.
 - ✦ Impacts associated with loss of amenity from reduced access to open space should have been accounted for.
- b) Lack of ability to comment on the urban design as part of the approval process - The EIS does not provide any opportunity to comment on the urban design and landscape component of the project. It states that 'a detailed review and finalisation of the architectural treatment of the project operational infrastructure would be undertaken ;during detailed design'. The Community should be given an opportunity to comment upon and influence the design and we object to the approval of the EIS on the basis that this detail is not provided, nor is the community (or other stakeholders) given an opportunity to comment or influence the final design.
- c) 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.
- d) The EIS social and economic impact study acknowledged the high value placed on retaining trees and vegetation in the affected area but does not mention that WestConnex has already destroyed more than 1000 trees in the St Peters Alexandria area around Sydney Park alone.

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: NICK BOYLAN

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: 67 WOODLANDS RD

Suburb: YAHIL Postcode: 3291

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

- One toll road leads to another 3 being proposed. The EIS's for the M4 East and the New M5 argued the case that serious congestion created near interchanges would be solved once the M4/M5 was built. Now it seems this is not the case and more roads will be needed to relieve the congestion – WHERE DOES THIS END? According to the M4/M5 EIS the real benefits will depend on building the Western Harbour Tunnel, the Airport Link and a tollway heading South. None of these projects have been planned, let alone approved but yet are part of addressing the congestion impacts acknowledged for the M4/M5link project. Given this how is it possible to know or address the impacts of the M4/M5 Link, unless this is just yet more justification for yet more roads?

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

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

- The Inner City Regional Bike Network has not been included among projects assessed under Cumulative Impacts. It is identified by Infrastructure

Australia as a Priority Initiative and should be included.

- Visual amenity - Pyrmont Bridge Road site - The EIS acknowledges that visual impacts will occur during construction. However it does not propose to address these negative impacts in the design of the project. This is unacceptable and the EIS needs to propose walls, plant and perimeter treatments and other measures at appropriate locations to lessen the impact on visual amenity. (Executive Summary xviii)
- Increased traffic cannot be accommodated in Central Sydney. It will further impede pedestrian movement and comfort and undermine easy access to public transport and reduce access to jobs over large areas of the city. It will undermine the attractiveness of Central Sydney to internationally competitive high productivity firms and their potential employees. Overall productivity is adversely affected.
- In view of the above no tunnelling less than 35m in depth from the surface to the crown of a tunnel (ie the top) under residences should be contemplated let alone undertaken. And of course no tunnelling should be undertaken under sensitive sites.
- Why is there no detailed information about the so called 'King Street Gateway' included in the EIS ?

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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: Jennifer Bowers

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: 20 The Boulevard

Suburb: Lewisham Postcode: 2049

Submission to:

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

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5
Link

A. At very minimum, the assessment of Strategic Alternative 1 (improvements to the existing arterial road network) should:

- ◆ Identify key network capacity issues.
- ◆ Develop a scenario of investments in (potentially major) arterial road improvements required to address the road network capacity constraints. The City of Sydney's alternative scheme provides one example of what improvements to the existing arterial road network might look like.
- ◆ Carry out transport modelling and economic analysis to inform the assessment of the alternative.

B. I completely reject this EIS due to its failure to consider the alternative plan put forward by the City of Sydney.

C. 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.

D. It is obvious the NSW government is in a desperate rush to get planning approval for the M4/M5. It has only allowed 60 days for comment yet the M4/M5 project is the most expensive and complicated stage of WestConnex. Critically, it involves building three layers of underground tunnels under parts of Rozelle. Such tunnelling does not exist anywhere in the world and as yet there are no engineering plans for this complex

construction. Approval depends on senior staff in NSW Planning compliantly agreeing to tick off on the EIS, as was done with the New M5 and the M4. This demonstrates a wanton disregard for the safety of the residents of Rozelle and those who will be using the tunnel. WHAT IS THE RUSH?

E. 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.

F. 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.

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: Wendy Bellamy

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: 21 Miller Rd

Suburb: Chester Hill Postcode: 2162

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 site of the facility if it is moved. This will also enable direct pedestrian access to the light rail without the need to use the winding path at the rear of the site which creates safety issues and adds to the time required to access the light rail stop.
- The site should be returned to the community as compensation for the imposition of this construction site in our neighbourhood for a 5 year period. If the substation and water treatment plant is moved to the north of the site, then the lower half of the site (which is the most accessible end) could be converted into open space with mature trees planted. As this site is immediately adjacent to the bay run, bicycle parking and other facilities that support active transport could be included. This would result increase the green space for residents and result in a pleasant green environment for pedestrians, rather than a fenced facility.
- The EIS currently permits trucks to access local roads in 'exceptional circumstances', which includes queuing at the site. Given the constraints of the site (and based on experience with cars accessing the site for Dan Murphy's), queuing will be the norm and not the exception. The EIS needs to be amended to rule out queuing as an exceptional circumstance which allows trucks to use local roads.
- All of the streets abutting Darley Road identified as NCA 13 (James Street to falls Street) should have a blanket 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. These streets are not constructed for heavy vehicle movements and on this basis should also be ruled out. The EIS needs to prohibit outright truck movements including parking) and worker parking on all of these streets.
- The EIS needs to require that all workers are bussed in or use public transport such as the light rail with no parking whatsoever permitted on local roads at the Darley Road site. This is justified because the site provides 11 car spaces for an estimated 100 workers a day on site. The project cannot be approved on this basis without a strict requirement on workers to use public transport or project provided transport and a prohibition needs to be in place against parking on local streets. The EIS needs to require that this restriction is included in all contracts and in the relevant approval documentation.
- The Darley Road site should be rejected because it involves acquiring Dan Murphy's. This business was rennovated and opened with full knowledge that it was to be acquired. The lessee and sub-lessees should not be permitted compensation in these circumstances. The demolition of the entire building (which the EIS confirms will occur) is wasteful and represents mismanagement of public resources.

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: Robin Mead

Signature: [Signature]

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

Address: 9/92 94 Cambridge St.

Suburb: Stannore 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

- ◆ 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 currently permits trucks to access local roads in 'exceptional circumstances', which includes queuing at the site. Given the constraints of the site (and based on experience with cars accessing the site for Dan Murphy's), queuing will be the norm and not the exception. The EIS needs to be amended to rule out queuing as an exceptional circumstance which allows trucks to use local roads
- ◆ 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 identifies a risk to children from construction traffic at Haberfield School. I find such risks unacceptable and am not satisfied with a promise of a Plan to which the public is excluding from viewing or providing feedback until it is published.
- ◆ I object to the location of a permanent substation and water treatment plant following the completion of the project on the Darley Road site. This will limit the future uses of the land and the community has been continually assured that the land, which is Government-owned, would be available for community purposes. The presence of this facility will forever prevent the ability for safe and direct pedestrian access to the light rail stop, with users required to walk down a dark and winding path. It will also limit the future use of the site. If a permanent facility is to be located then it should be moved to the north of the site so that it is out of sight of homes and has less visual impact on residents.
- ◆ 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.
- ◆ I do not consider it acceptable that cycling/pedestrian routes should be changed for four years in Annandale and Rozelle in ways that will make cycling more difficult and walking less possible for residents with reduced mobility. These are vital community transport routes.

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

Name _____ Email _____ Mobile _____

Attention Director

Application Number: SSI 7485

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

Application Name: WestConnex M4-M5 Link

Name:

Robert Dineen

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:

9/92-92 Cambridge St.

Suburb:

Stammar

Postcode

2048

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

- The EIS needs to require that all workers are bussed in or use public transport such as the light rail with no parking whatsoever permitted on local roads at the Darley Road site. This is justified because the site provides 11 car spaces for an estimated 100 workers a day on site. The project cannot be approved on this basis without a strict requirement on workers to use public transport or project provided transport and a prohibition needs to be in place against parking on local streets. The EIS needs to require that this restriction is included in all contracts and in the relevant approval documentation
- 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 EIS proposes that all trucks will arrive at the Darley Road civil and tunnel site from Haberfield and travel along Darley Road to the site, with a right-hand turn now permitted into James Street. The proposed route will result in a truck every 3-4 minutes for 5 years running directly by the small houses on Darley Road. These homes will not be habitable during the five-year construction period due to the unacceptable noise impacts. The truck noise will be worsened by their need to travel up a steep hill to return to the City West Link, so the noise impacts will affect not just those homes on or immediately adjacent to Darley Road.
- 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.
- The Darley Road site will not be returned after the project, with a substantial portion permanently housing a Motorways Operations facility which involves a substation and water treatment plant. This means that the residents will not be able to directly access the North Light rail Station from Darley Road but will have to traverse Canal Road and use the narrow path from the side. In addition the presence of this facility reduces the utility of this vital land which could be turned into a community facility. Over the past 12 months community representatives were repeatedly told that the land would be returned and this has not occurred. We also object to the location of this type of infrastructure in a neighbourhood setting.
- 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.

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: Robin Munn

Signature: [Signature]

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

Address: 9/92-94 Cambridge 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

- ◇ 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.
- ◇ 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.
- ◇ I am concerned that while hundreds of impacts on resident, including noise, loss of business, dust, and lost time through more traffic congestion, are identified in the EIS, the approach is always to recommend approval and promise vague 'mitigation' in the future. This is not good enough.
- ◇ The EIS indicates that 36 homes will have unacceptable noise impacts for extended periods at the Darley road construction site. The EIS does not mention the cumulative impact of aircraft noise in the Leichhardt or St Peters area, and therefore does not reflect the true impact of construction noise on the amenity of nearby residents and businesses. The noise impacts of construction are not able to be mitigated to an acceptable level and the EIS should not be approved on this basis.
- ◇ 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.
- ◇ 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 impacts on The Crescent and Annandale are massive and were not sufficiently revealed in the Concept Design to enable residents to give feedback on the negative impacts on communities and businesses in the area.
- ◇ 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.

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: Ash Towse

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: 218 Church 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

1. Rozelle Interchange and surrounds will experience **increased traffic with associated noise and air pollution**— most particularly at the **Crescent, Johnson St and Catherine St**, Annandale/Lilyfield/Leichhardt and **Ross Street**, Glebe. These streets are already highly congested at peak times and with a massive number of extra truck movements and traffic associated with construction, these streets will become gridlocked during peak times.
2. The EIS states that 'a preferred noise mitigation option' would be determined during 'detailed design'. This is unacceptable and residents have no opportunity to comment on the detailed designs. The failure to include this detail means that residents have no idea as to what is planned and cannot comment or input into those plans. (Executive Summary xvi)
3. All of the streets abutting Darley Road identified as NCA 13 (James Street to falls Street) should have a blanket prohibition on any truck movements and worker contractor parking. These hoems 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. These streets are not constructed for heavy vehicle movements and on this basis should also be ruled out. The EIS needs to prohibit outright truck movements including parking) and worker parking on all of these streets.
4. There will be increases of noise in the area of Johnston St where traffic volumes will increase. Residents will be more susceptible to 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 living activities like eating outdoors. However the EIS considers this to be only moderately negative. This is not acceptable.
5. 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.
6. The EIS does not mention the impact of aircraft noise and its cumulative impact. As such, the noise levels identified are misleading. I object to the selection of the Darley Road site because of the unacceptable noise impacts it will have on surrounding homes and businesses.

Attention Director

Application Number: SSI 7485

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

Application Name:

WestConnex M4-M5 Link

Name:

JAMES Ivimey

Signature:

James Ivimey

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

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

Address:

Frederick House 13/82 Bungst

Suburb:

Waterloo

Postcode

NSW

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.

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

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

James

Email

I'll contact you Kelly

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:

NICK TORRENS

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:

42 Terminus Street

Suburb:

Petersham

Postcode 2049

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.

1. Along with the widening of the Crescent at Annandale the White's Creek bridge is to be rebuilt. This will mean that the road in this area will be reduced in width as first one side of the bridge is rebuilt followed by the other. Added to the additional volume of trucks from the Rozelle Rail Yards, the Crescent Civil site and the Camperdown site this is going to lead to massive congestion on Johnston St and all along the Crescent towards Ross St and make it virtually impossible for residents to exit and return to their local area. It is most likely that the commercial sectors of the Tramsheds development will be badly affected.
2. The EIS refers to be construction impacts as being 'temporary'. I do not consider a five year construction period to be temporary.
3. The Inner West Greenway was considered but not assessed as a cumulative impact. One of the claimed project benefits of the proposal is improved east/west crossings of Parramatta Rd for pedestrians/bikes and the Greenway would achieve this and should be assessed and provided as part of the project. The Greenway was part of inner west LR project before it was deferred in 2011 and Inner West Council has done extensive work on it.
4. Human health risk (Executive Summary xvi) - The EIS states that there may be a 'small increase in pollutant concentrations' near surface roads. The EIS states that potential health impacts associated with changes in air quality (specifically nitrogen dioxide and particulates) within the local community have been assessed and are considered to be 'acceptable.' We disagree that the impacts on human health are acceptable and object to the project in its entirety because of these impacts.
5. At the western end of Bignell Lane near Pyrmont Bridge Road existing flood depth was identified up to one metre in the 100 year ARI. The NSW Government Floodplain Development Manual (2005) identifies this location as a high flood hazard area.
6. The EIS states the Inner West Interchange would be under 3 suburbs - Lilyfield, Annandale and Leichhardt - so clearly it would cover a very extensive area (see map in EIS Vol 1A Chap 5 Part 1 p11) with drilling and danger of subsidence affecting hundreds of homes.
7. 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.

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>LILY GOBRAN</u>	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature: <u>[Signature]</u>	Attn: Director – Transport Assessments
Please include my personal information when publishing this submission to your website Declaration: I HAVE NOT made any reportable political donations in the last 2 years.	Application Number: SSI 7485 Application
Address: <u>Coral road</u>	Application Name: WestConnex M4-M5 Link
Suburb: <u>Woolloomooloo</u> Postcode: <u>2233</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.**

- Table 6.1 in Appendix Q (Social and Economic impact) is not an accurate report on the concerns of residents. It downplays concerns of Newtown, St Peters and Haberfield residents. It does not even mention concerns about additional years of construction in Haberfield and St Peters. The raises the question of whether this is a result of the failure of SMC to notify impacted residents including those on the Eastern Side of King Street and St Peters about the potential impacts of the M4 M5
- 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.
- 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.
- I am appalled to read in the EIS that more than 100 homes across the Rozelle construction sites will be severely affected by construction noise for months or even years at a time. This would include hundreds of individual residents including young children, school students and people who spend time at home during the day. The predicted levels are more than 75 decibels and high enough to produce damage over an eight hour period. Such noise levels will severely impact on the health, capacity to work and quality of life of residents. NSW Planning should not give approval to a project that could cause such impacts. Promises of potential mitigation are not enough, especially when you consider the ongoing unacceptable noise in Haberfield during the M4East construction.
- I am completely opposed to approving a project in which the Air quality experts recommend rather than filtrating stacks extra stacks could be added later.
- The EIS acknowledges that extra construction traffic will add to travel times across the Inner West and have a negative impact on businesses in the area. No compensation is suggested. These impacts are not been taken into account of evaluating the cost of WestCONnex.

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:

Bronwyn CAMPBELL

Signature:

B Campbell

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:

72 Birchgrove Rd

Suburb:

Balmuir

Postcode

2041

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

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

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: Robert Leach

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: 181 ALEXANDRIA ST

Suburb: NEWTOWN Postcode: 2092

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

- ◇ No need for 'dive' site – Leichhardt. There is no need for the Darley Road site, other than a time saving (tunneling) of several months. It is unacceptable that the community should be forced to endure 5 years of severe disruption to accommodate the timetable of the private contractors. The EIS should not be approved on the basis that it contains provision for the Darley Road site without any proper justification as for its need.
- ◇ Rozelle Interchange and surrounds will experience **increased traffic with associated noise and air pollution**– most particularly at the **Crescent, Johnson St and Catherine St**, Annandale/Lilyfield/Leichhardt and **Ross Street**, Glebe. These streets are already highly congested at peak times and with a massive number of extra truck movements and traffic associated with construction, these streets will become gridlocked during peak times.
- ◇ The EIS does not mention the impact of aircraft noise and its cumulative impact. As such, the noise levels identified are misleading. I object to the selection of the Darley Road site because of the unacceptable noise impacts it will have on surrounding homes and businesses.
- ◇ 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.
- ◇ 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)
- ◇ The EIS states that 'a preferred noise mitigation option' would be determined during 'detailed design'. This is unacceptable and residents have no opportunity to comment on the detailed designs. The failure to include this detail means that residents have no idea as to what is planned and cannot comment or input into those plans. (Executive Summary xvi)
- ◇ For example, the AECOM EIS for the New M5 failed to deal with how the massively contaminated land fill at Alexandria would be managed during construction. After months of sickening odours, the NSW EPA admits that despite fining SMC and requiring contractors to take measures to control odours, they have not stopped. It acknowledges that it does not have the power to stop work until WestConnex contractors comply with environmental regulations.

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Name _____ Email _____ Mobile _____

Submission from:	Submission to:
Name: <u>BARB LOCKETT</u>	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature: <u>[Signature]</u>	Attn: Director – Transport Assessments
Please include my personal information when publishing this submission to your website Declaration : I HAVE NOT made any reportable political donations in the last 2 years.	Application Number: SSI 7485 Application
Address: <u>50 MACLEAY ST</u>	Application Name: WestConnex M4-M5 Link
Suburb: <u>POTTS POINT</u> Postcode: <u>2011</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.**

- ◆ Rozelle Rail Yards and Rozelle Civil Site. It is clear that the most highly affected area of Stage 3 will be the Rozelle area and the massive and hugely complex Rozelle interchange. The suggestion that Westconnex is capable of building this is highly questionable. Nothing like this has been built anywhere else in the World. Considering the simple problems of dust management, noxious gasses and the handling of toxic materials like asbestos that have been so inappropriately dealt with on Stages 1 and 2 by Westconnex this intersection of Stage 3 is a disaster waiting to happen and should definitely not be allowed to proceed without a massive investigation. What has been shown in the EIS is totally inadequate for this project to be allowed to proceed.
- ◆ The proposed work hours for the Rozelle Rail Yards are tunnelling and spoil handling 24 hours a day seven days a week. Civil construction Mon - Fri 7.00am – 6.00pm, Sat 8.00am -1.00 pm. There will be no night work at The Crescent Civil Site and the daytime hours are stated to be the same as at the Rozelle Rail Yards. However as has been experienced by those at Haberfield and St Peters these hours and especially late and night work have been extended and implemented when the schedule has fallen behind and this has lead to physical and mental stress for many residents through interrupted sleep and loss of sleep especially with children. The roads and sites at night in the area will see a marked increase in noise from truck movements, truck reversing alarms and running machinery. It will also see a marked increase in light during the night hours with site illumination and vehicle head lights as has been experienced in other areas. These problems have not been properly addressed and are not adequately dealt with in the EIS.
- ◆ The tunnels under Rozelle/Lilyfield are going to be in three levels. The EIS does not explain what safety procedures are being built into the project to deal with situations like serious congestion, accidents or fire. With a serious hold up on the deepest of these tunnels it is clear that the air quality will very quickly become toxic unless substantial air conditioning is a major part of the design. There is no in depth detail about how these issues are going to be addressed. This is not acceptable.
- ◆ One of the main reasons for establishing Buruwan Park was as a relatively quiet nature corridor for wildlife not for successions of children's parties so the assessment of this area in the EIS is entirely blinkered and inaccurate. The Rozelle Rail Yards site that may appear to development driven planners as an unattractive and wasted eyesore is ironically a very important nature reserve. It is perhaps the only area in the Annandale/Glebe area 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.

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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:

BARB LOCKETT

Signature:

SO MACLEAY ST BELLOCK

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:

SO MACLEAY ST

Suburb:

POTTS POINT

Postcode

2011

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

- A. THE LATEST EIS WAS RELEASED JUST TEN BUSINESS DAYS AFTER FEEDBACK PERIOD ENDED FOR THE CONCEPT DESIGN FOR THE M4/M5 AND BEFORE PRELIMINARY DRILLING TO ESTABLISH A ROUTE THROUGH THE INNER WEST IS COMPLETED. WHAT IS THE RUSH? THIS EIS IS LITTLE MORE THAN A CONCEPT DESIGN AND IS FAR LESS DEVELOPED THAN EARLIER ONES. IT IS COMPOSED OF MANY INDICATE ONLY PLANS SUCH THAT IT IS IMPOSSIBLE TO KNOW WHAT THE IMPACTS WILL BE AND YET APPROVAL IS BEING SOUGHT IN A RUSH. THE EIS IGNORES MORE THAN 1500 SUBMISSIONS, INCLUDING ONE OF 142 PAGES FROM THE INNER WEST COUNCIL.
- B. ONE TOLL ROAD LEADS TO ANOTHER 3 BEING PROPOSED. THE EIS'S FOR THE M4 EAST AND THE NEW M5 ARGUED THE CASE THAT SERIOUS CONGESTION CREATED NEAR INTERCHANGES WOULD BE SOLVED ONCE THE M4/M5 WAS BUILT. NOW IT SEEMS THIS IS NOT THE CASE AND MORE ROADS WILL BE NEEDED TO RELIEVE THE CONGESTION - WHERE DOES THIS END? ACCORDING TO THE M4/M5 EIS THE REAL BENEFITS WILL DEPEND ON BUILDING THE WESTERN HARBOUR TUNNEL, THE AIRPORT LINK AND A TOLLWAY HEADING SOUTH. NONE OF THESE PROJECTS HAVE BEEN PLANNED, LET ALONE APPROVED BUT YET ARE PART OF ADDRESSING THE CONGESTION IMPACTS ACKNOWLEDGED FOR THE M4/M5 LINK PROJECT. GIVEN THIS HOW IS IT POSSIBLE TO KNOW OR ADDRESS THE IMPACTS OF THE M4/M5 LINK, UNLESS THIS IS JUST YET MORE JUSTIFICATION FOR YET MORE ROADS?
- C. RESEARCH ABOUT ROADS CLEARLY DEMONSTRATES THAT ROADS CREATE CONGESTION. THE WESTCONNEX PROJECT IS NO DIFFERENT AND THE EIS CLEARLY INDICATES THAT THIS IS AN IMPACT OF THE M4/M5 AND THE CONSEQUENT ROADS THAT WILL FOLLOW. WHERE WILL THIS END AS THE M4/M5 LINK EIS ITSELF INDICATES THE RMS IS ALREADY HARD AT WORK CONSIDERING HOW TO SOLVE THESE PROBLEMS - OF CONGESTION CAUSED BY ROADS.
- D. WHERE IS THE COMMITMENT TO COMMUNITY CONSULTATION AND TO LONG TERM PLANNING WHEN THE EIS FOR THE M4/M5 LINK IS RELEASED BEFORE ANY RESPONSE TO THE EXTENSIVE COMMUNITY FEEDBACK ON THE M4-M5 LINK CONCEPT DESIGN COULD POSSIBLY HAVE BEEN SERIOUSLY CONSIDERED. THIS DEMONSTRATES DEEP GOVERNMENT CONTEMPT FOR THE PEOPLE OF NSW AND THE COMMUNITIES OF THE INNER WEST OF SYDNEY IN PARTICULAR.
- 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. FOR EXAMPLE, THE AECOM EIS FOR THE NEW M5 FAILED TO DEAL WITH HOW THE MASSIVELY CONTAMINATED LAND FILL AT ALEXANDRIA WOULD BE MANAGED DURING CONSTRUCTION. AFTER MONTHS OF SICKENING ODOURS, THE NSW EPA ADMITS THAT DESPITE FINING SMC AND REQUIRING CONTRACTORS TO TAKE MEASURES TO CONTROL ODOURS, THEY HAVE NOT STOPPED. IT ACKNOWLEDGES THAT IT DOES NOT HAVE THE POWER TO STOP WORK UNTIL WESTCONNEX CONTRACTORS COMPLY WITH ENVIRONMENTAL REGULATIONS.

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Name _____ Email _____ Mobile _____

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: BARB LOCKETT
Application Number: SSI 7485	Address: 50 MACLEAY ST Suburb: PORT POINT Postcode 2011
Application Name: WestConnex M4-M5 Link	Signature: BELOCKETT
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 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.
2. EIS 6.1 (Synthesis, Page 45) states. "..... this may result in changes to both the project design and the construction methodologies described and assessed in this EIS. Any changes to the project would be reviewed for consistency with the assessment contained in the EIS including relevant mitigation measures, environmental performance outcomes and any future conditions of approval". It is unstated just who would have responsibility for such a "review(ed) for consistency", and how these changes would be communicated to the community. The EIS should not be approved till significant 'uncertainties' have been fully researched and surveyed and the results (and any changes) published for public comment (ie : the Sydney Water Tunnels issues at 12-57)
3. 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.
4. Why is there no detailed information about the so called 'King Street Gateway' included in the EIS ?
5. An on-line interactive map was published with the M4-M5 Concept Design that indicated a very wide yellow 'swoosh' that is upwa0rds 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.

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Submission from:	Submission to:
Name: <u>BARB LOCKET</u>	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature: <u>B. Lockett</u>	Attn: Director – Transport Assessments
Please include my personal information when publishing this submission to your website Declaration: I HAVE NOT made any reportable political donations in the last 2 years.	Application Number: SSI 7485 Application
Address: <u>50 MACLEAY ST</u>	Application Name: WestConnex M4-M5 Link
Suburb: <u>Potts Point</u> Postcode: <u>2011</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.

- The EIS social an economic impact study acknowledged the high value placed on retaining trees and vegetation in the affected area but does not mention that WestCONnex has already destroyed more than 1000 trees in the St Peters Alexandria area around Sydney Park alone.
- The EIS claims to have saved Blackmore Park and Easton Park due to negative community feedback. I am concerned that this is a false claim and that this site was never really in contention due to other physical factors. I would like NSW Planning to investigate whether this claim is correct to have heeded the community is false or not.
- The Air quality data is confusing and is not presented in a form that the community can interpret. The lack of clarity leads to a suspicion that areas of concern are being covered up.
- I am completely opposed to approving a project in which the Air quality experts recommend rather than filtrating stacks extra stacks could be added later.
- The EIS acknowledges that impacts of construction should M4M5 get approval will worsen traffic congestions on Parramatta Rd. In these circumstances it would be outrageous for motorists to be asked to pay up to up to \$20 a day in tolls. I object to the fact that this is not considered or factored into the traffic analysis.
- Streets in Haberfield would be subject to heavy vehicle traffic for a further four years, making at least 7 years of heavy impacts on a single suburb. The answer is not a "community strategy". Residents who believed that their pain would be over after the M4 east are now being asked to sustain a further four years of impacts. No compensation or serious mitigation is suggested.
- The EIS 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.
- I do not consider it acceptable that cycling/pedestrian routes should be changed for four years in Annandale and Rozelle in ways that will make cycling more difficult and walking less possible for residents with reduced mobility. These are vital community transport routes.

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<p>Attention Director Application Number: SSI 7485</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>BARR LOCKETT</u></p> <p>Signature: <u>B. Lockett</u></p> <p>Please include my personal information when publishing this submission to your website. I HAVE NOT made reportable political donations in the last 2 years.</p> <p>Address: <u>50 MACLEAY ST</u></p> <p>Suburb: <u>POTTS POINT</u> Postcode <u>2011</u></p>
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I object to the WestConnex M4-M5 Link proposals for the following reasons:

- A. 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
- B. The EIS states that spoil haulage hours will be restricted but ignores the fact that the same was promised for the M4 East but these promises have been ignored repeatedly.
- C. The EIS states "Direct and indirect traffic disruptions are likely to be experienced on local and arterial roads in most suburbs that are in close proximity to construction sites. This would include the suburbs of Ashfield, Haberfield, St Peters, Camperdown, Annandale, Lilyfield, Leichhardt, and Rozelle." Despite this finding, the study then pushes these negative impacts aside as inevitable. There is never any evaluation of whether in the light of the negative impacts an alternative public infrastructure project might be preferable.
- D. The impacts on The Crescent and Annandale are massive and were not sufficiently revealed in the Concept Design to enable residents to give feedback on the negative impacts on communities and businesses in the area.
- E. 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.
- F. Table 6.1 in Appendix Q (Social and Economic impact) is not an accurate report on the concerns of residents. It downplays concerns of Newtown, St Peters and Haberfield residents. It does not even mention concerns about additional years of construction in Haberfield and St Peters. The raises the question of whether this is a result of the failure of SMC to notify impacted residents including those on the Eastern Side of King Street and St Peters about the potential impacts of the M4 M5
- G. The EIS identifies a risk to children from construction traffic at Haberfield School. I find such risks unacceptable and am not satisfied with a promise of a Plan to which the public is excluding from viewing or providing feedback until it is published.

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Submission from: Name: <u>BARB LOCKET</u> 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. Address: <u>50 MACLEAY ST</u> Suburb: <u>POTTS POINT</u> Postcode: <u>2011</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.

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| <p>i. The volume of extra heavy traffic in the Rozelle area and the acknowledged impact this will have on local roads is completely unacceptable to me.</p> <p>ii. The social and economic impact study fails to record the great concern for valued Newtown heritage</p> <p>iii. 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.</p> <p>iv. The consultants for the Social and Economic Impact study is HillPDA. This company has a conflict of interest and is not an appropriate choice to do a social impact study of WestCONnex. Amongst its services it offers property valuation services and promotes property development in what are perceived to be strategic locations. HillPDA were heavily involved in work leading to the development of Urban Growth NSW and the heavily criticised Parramatta Rd Study. It is not in the public interest to use public funds on an EIS done by a company that has such a heavy stake in property development opportunities along the Parramatta Rd corridor. One of the advantages of property development along Parramatta Rd that Hill PDA promotes on its website is the 33 kilometre WestCONnex.</p> <p>v. The EIS acknowledges that extra construction traffic will add to travel times across the Inner</p> | <p>West and have a negative impact on businesses in the area. No compensation is suggested. These impacts are not been taken into account of evaluating the cost of WestCONnex.</p> <p>vi. The EIS acknowledges that 'rat running' by cars to avoid added congestion and delays caused by construction traffic will put residents at risk. No only solution is a Management Plan, which is yet to be developed, and to which the public will have no impact. This is completely unacceptable.</p> <p>vii. The EIS refers to be construction impacts as being 'temporary'. I do not consider a five year construction period to be temporary.</p> <p>viii. Table 6.1 in Appendix Q (Social and Economic impact) is not an accurate report on the concerns of residents. It downgrades the concerns of Newtown, St Peters and Haberfield residents. It does not even mention concerns about additional years of construction in Haberfield and St Peters. It also does not mention concerns about heritage impacts in Newtown. I can only assume that this is because there was almost no consultation in Newtown and a failure to notify impacted residents including those on the Eastern Side of King Street and St Peters.</p> |
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Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: BARB LOCKETT	
	Address: 50 MACLEAY ST	
Application Number: SSI 7485	Suburb: POTTS POINT	Postcode 2011
Application Name: WestConnex M4-M5 Link	Signature: BLOCKETT	
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:

- 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.

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Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <u>BARB LOCKETT</u>
Application Number: SSI 7485	Address: <u>50 MACLEAY ST</u> Suburb: <u>POTTS POINT</u> Postcode <u>2011</u>
Application Name: WestConnex M4-M5 Link	Signature: <u>Barb Lockett</u>
<p align="center">Please <u>include</u> my personal information when publishing this submission to your website Declaration: I HAVE NOT 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:

- The EIS admits that air pollutants will exceed permitted levels along the Canal Rd used to access the St Peters Interchange because the traffic will be heavier. This is an unacceptable impact which will adversely affect vehicle users because it is known that people in their vehicles are not protected from the air pollution, as well as anyone on foot or cycling in the streets around the interchange. No amelioration is offered.
- The EIS states that traffic congestion around the St Peters Interchange is expected to be worse after completion of the M5 and the M4-M5 Link particularly in the evening peak hour. The EIS admits that this will have a "moderate negative" impact on the neighbourhood in increasing pollution (also admitted separately) therefore in health impacts, on safety for foot and cycle traffic but also for vehicles and on the local amenity.
- The traffic around St Peters expected to be heavier because of the increased road access to the new Interchange will adversely affect our community because moving around to our parks and to the shops, to the buses and to the train stations, for pedestrians and cars, will be more difficult. Our community is being sacrificed for the marginal improvement in traffic movement elsewhere in Sydney. No measures to ameliorate the impact are mentioned. This is unacceptable.
- The EIS 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.
- It is obvious the NSW government is in a desperate rush to get planning approval for the M4/M5. It has only allowed 60 days for comment yet the M4/M5 project is the most expensive and complicated stage of WestConnex. Critically, it involves building three layers of underground tunnels under parts of Rozelle. Such tunnelling does not exist anywhere in the world and as yet there are no engineering plans for this complex construction. Approval depends on senior staff in NSW Planning compliantly agreeing to tick off on the EIS, as was done with the New M5 and the M4. This demonstrates a wanton disregard for the safety of the residents of Rozelle and those who will be using the tunnel. WHAT IS THE RUSH?

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Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: BARR LOCKETT	
Application Number: SSI 7485	Address: 50 MACLEAY ST	
Application Name: WestConnex M4-M5 Link	Suburb: LOTS POINT	Postcode 2011
	Signature: B. Lockett	
Please include my personal information when publishing this submission to your website Declaration : I HAVE NOT made any reportable political donations in the last 2 years.		

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

- ❖ I 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.
- ❖ I am appalled to read in the EIS that more than 100 homes across the Rozelle construction sites will be severely affected by construction noise for months or even years at a time. This would include hundreds of individual residents including young children, school students and people who spend time at home during the day. The predicted levels are more than 75 decibels and high enough to produce damage over an eight hour period. Such noise levels will severely impact on the health, capacity to work and quality of life of residents. NSW Planning should not give approval to a project that could cause such impacts. Promises of potential mitigation are not enough, especially when you consider the ongoing unacceptable noise in Haberfield during the M4East construction.
- ❖ Residents of Haberfield should not be asked to choose between two construction sites. This smacks of manipulation and a deliberate attempt to divide a community. Both choice extend construction impacts for four years and severely impact the quality of life of residents. NSW Planning should reject the impacts on Haberfield as unacceptable. (page 106)
- ❖ 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 will change if the design changes. My understanding is that the design could change without the public being specifically notified or given the chance for feedback. This means that there is a possibility of hundreds of residents being severely impacted who are not even identified in this EIS. I find this completely unacceptable.
- ❖ I do not accept the finding in the Appendix P that there will be no noise exceedences during construction at Campbell Rd St Peters. There has been terrible noise during the early construction of the New M5. Why would this stop, especially given the construction is just as close to houses? Is it because the noise is already so bad that comparatively it will not be that much worse. This casts doubt on the whole noise study.
- ❖ I completely reject this EIS due to its failure to consider the alternative plan put forward by the City of Sydney.

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: BARB LOCKET	
Application Number: SSI 7485	Address: 50 MACLEAY ST	
Application Name: WestConnex M4-M5 Link	Suburb: POTTS POINT	Postcode: 2011
	Signature: BEJOCKET	
Please include my personal information when publishing this submission to your website Declaration : I HAVE NOT made any reportable political donations in the last 2 years.		

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

- I do not accept that King Street traffic congestion will be improved by this project, There should be a complete review of the traffic modelling that does not appear to take sufficient notice of the impact of pouring 51000 extra cars down Euston Rd on top of increases in population in the area. Given that there is no outlet between the St Peters and Haberfield or Rozelle, all traffic going to the CBD, East or into the Inner West will use local roads.
- EIS 6.1 (Synthesis, Page 45) states. "*..... this may result in changes to both the project design and the construction methodologies described and assessed in this EIS. Any changes to the project would be reviewed for consistency with the assessment contained in the EIS including relevant mitigation measures, environmental performance outcomes and any future conditions of approval*". It is unstated just who would have responsibility for such a "review(ed) for consistency", and how these changes would be communicated to the community. The EIS should not be approved till significant 'uncertainties' have been fully researched and surveyed and the results (and any changes) published for public comment (ie : the Sydney Water Tunnels issues at 12-57)
- I object to the issue of this EIS only 14 days after the period for submission of comments on the concept design closed. There is no public response to the 1,000s of comments made on the design and it seems impossible that the comments could have been reviewed, assessed and responses to them incorporated into the EIS in that time. This casts doubt over the integrity of the entire EIS process.
- Why is there no detailed information about the so called 'King Street Gateway' included in the EIS ?
- An on-line interactive map was published with the M4-M5 Concept Design that indicated a very wide yellow 'swoosh' that is upwards of a kilometre wide in some sections of the M4-M5 proposals. SMC have NEVER publicly published or acknowledged that the contractor to be appointed to build the tunnels will be 'encouraged' to do so within the yellow swoosh footprint, but may go outside the indicative swoosh area if found necessary after further geotech and survey work. The proposed Sydney Water Tunnels surveys (EIS 12-57) could potentially see a dramatic change in the tunnel alignments in the Newtown area. Why were these surveys not done during the past three years such that 'definitive' rather than 'indicative' alignments could be published. The EIS should be withdrawn till such time that it is a true and fair 'definitive' document open for genuine public comment.

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

Name _____ Email _____ Mobile _____

Submission from:	Submission to:
Name: <u>Leah Rauch</u>	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature: <u>Leah Rauch</u>	Attn: Director – Transport Assessments
Please include my personal information when publishing this submission to your website Declaration : I HAVE NOT made any reportable political donations in the last 2 years.	Application Number: SSI 7485 Application
Address: <u>23 Mona St</u>	Application Name: WestConnex M4-M5 Link
Suburb: <u>Whittfield</u> Postcode: <u>4870</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.**

- Table 6.1 in Appendix Q (Social and Economic impact) is not an accurate report on the concerns of residents. It downplays concerns of Newtown, St Peters and Haberfield residents. It does not even mention concerns about additional years of construction in Haberfield and St Peters. The raises the question of whether this is a result of the failure of SMC to notify impacted residents including those on the Eastern Side of King Street and St Peters about the potential impacts of the M4 M5
- 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.
- 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.
- I am appalled to read in the EIS that more than 100 homes across the Rozelle construction sites will be severely affected by construction noise for months or even years at a time. This would include hundreds of individual residents including young children, school students and people who spend time at home during the day. The predicted levels are more than 75 decibels and high enough to produce damage over an eight hour period. Such noise levels will severely impact on the health, capacity to work and quality of life of residents. NSW Planning should not give approval to a project that could cause such impacts. Promises of potential mitigation are not enough, especially when you consider the ongoing unacceptable noise in Haberfield during the M4East construction.
- I am completely opposed to approving a project in which the Air quality experts recommend rather than filtrating stacks extra stacks could be added later.
- The EIS acknowledges that extra construction traffic will add to travel times across the Inner West and have a negative impact on businesses in the area. No compensation is suggested. These impacts are not been taken into account of evaluating the cost of WestCONnex.

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:

Anna Cody

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:

42 Wells St

Suburb:

Newtown

Postcode

2042

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.

- A. 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.
- B. The EIS identifies hundreds of risks at different construction sites. In relation to these risks the EIS recommends proceeding despite the risks; or seeking a way to mitigate risks during the "detailed design" phase. That phase excludes the public altogether. That is, the M4/M5 should be approved with no calculation of risks or what mitigation may mean for impacted residents.
- C. I am concerned that the AECOM, the company responsible for the EIS, always approves knocking down heritage buildings if the project requires it. It doesn't how much value it holds for the community, it must always be destroyed.
- D. Table 6.1 in Appendix Q (Social and Economic impact) is not an accurate report on the concerns of residents. It downplays concerns of Newtown, St Peters and Haberfield residents. It does not even mention concerns about additional years of construction in Haberfield and St Peters. The raises the question of whether this is a result of the failure of SMC to notify impacted residents including those on the Eastern Side of King Street and St Peters about the potential impacts of the M4 M5
- E. 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.

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:

MARY HARRISON

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:

142 ALICE ST

Suburb:

NEWTOWN

Postcode

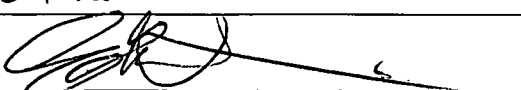
2042

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

- A. 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
- B. The EIS states that spoil haulage hours will be restricted but ignores the fact that the same was promised for the M4 East but these promises have been ignored repeatedly.
- C. The EIS states "Direct and indirect traffic disruptions are likely to be experienced on local and arterial roads in most suburbs that are in close proximity to construction sites. This would include the suburbs of Ashfield, Haberfield, St Peters, Camperdown, Annandale, Lilyfield, Leichhardt, and Rozelle." Despite this finding, the study then pushes these negative impacts aside as inevitable. There is never any evaluation of whether in the light of the negative impacts an alternative public infrastructure project might be preferable.
- D. The impacts on The Crescent and Annandale are massive and were not sufficiently revealed in the Concept Design to enable residents to give feedback on the negative impacts on communities and businesses in the area.
- E. 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.
- F. Table 6.1 in Appendix Q (Social and Economic impact) is not an accurate report on the concerns of residents. It downplays concerns of Newtown, St Peters and Haberfield residents. It does not even mention concerns about additional years of construction in Haberfield and St Peters. The raises the question of whether this is a result of the failure of SMC to notify impacted residents including those on the Eastern Side of King Street and St Peters about the potential impacts of the M4 M5
- G. The EIS identifies a risk to children from construction traffic at Haberfield School. I find such risks unacceptable and am not satisfied with a promise of a Plan to which the public is excluding from viewing or providing feedback until it is 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 _____

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: EDWARD O'LOUGHLIN
Application Number: SSI 7485	Address: 707 / 58-60 KING ST Suburb: NEWTON Postcode 2042
Application Name: WestConnex M4-M5 Link	Signature: 
Please include my personal information when publishing this submission to your website Declaration: I HAVE NOT made any reportable political donations in the last 2 years.	

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

- The EIS admits that air pollutants will exceed permitted levels along the Canal Rd used to access the St Peters Interchange because the traffic will be heavier. This is an unacceptable impact which will adversely affect vehicle users because it is known that people in their vehicles are not protected from the air pollution, as well as anyone on foot or cycling in the streets around the interchange. No amelioration is offered.
- The EIS states that traffic congestion around the St Peters Interchange is expected to be worse after completion of the M5 and the M4-M5 Link particularly in the evening peak hour. The EIS admits that this will have a "moderate negative" impact on the neighbourhood in increasing pollution (also admitted separately) therefore in health impacts, on safety for foot and cycle traffic but also for vehicles and on the local amenity.
- The traffic around St Peters expected to be heavier because of the increased road access to the new Interchange will adversely affect our community because moving around to our parks and to the shops, to the buses and to the train stations, for pedestrians and cars, will be more difficult. Our community is being sacrificed for the marginal improvement in traffic movement elsewhere in Sydney. No measures to ameliorate the impact are mentioned. This is unacceptable.
- The EIS 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.
- It is obvious the NSW government is in a desperate rush to get planning approval for the M4/M5. It has only allowed 60 days for comment yet the M4/M5 project is the most expensive and complicated stage of WestConnex. Critically, it involves building three layers of underground tunnels under parts of Rozelle. Such tunnelling does not exist anywhere in the world and as yet there are no engineering plans for this complex construction. Approval depends on senior staff in NSW Planning compliantly agreeing to tick off on the EIS, as was done with the New M5 and the M4. This demonstrates a wanton disregard for the safety of the residents of Rozelle and those who will be using the tunnel. WHAT IS THE RUSH?

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:..... **SOBEL ZIKA**

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:..... **4 ADA ST**

Suburb: **ERSKENVILLE** Postcode..... **2043**

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 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 construction and operation of the project will result in 51 property acquisitions. We object to the project in its entirety because of this impact. We note that a number of long-standing businesses have been acquired and that many families and businesses in earlier stages have been forced to go to court to seek fair compensation. We object to the acquisition in particular of the Dan Murphys site. The business was substantially renovated and a new business opened with full knowledge of the likely acquisition. We object to it being acquired and compensated in this circumstances and call on the Government to investigate the circumstances which led to this occurring (Executive Summary xvii)
- One toll road leads to another 3 being proposed. The EIS's for the M4 East and the New M5 argued the case that serious congestion created near interchanges would be solved once the M4/M5 was built. Now it seems this is not the case and more roads will be needed to relieve the congestion – WHERE DOES THIS END? According to the M4/M5 EIS the real benefits will depend on building the Western Harbour Tunnel, the Airport Link and a tollway heading South. None of these projects have been planned, let alone approved but yet are part of addressing the congestion impacts acknowledged for the M4/M5 link project. Given this how is it possible to know or address the impacts of the M4/M5 Link, unless this is just yet more justification for yet more roads?
- The RMS has previously identified the Darley Rd site in Leichhardt as the third most dangerous traffic hazard in the Inner West. The NSW Land and Environment Court found that the location of the site couldn't safely deal with 60 bottle truck movements a week, but the M4/M5 EIS shows that more than 800 vehicles including hundreds of heavy ones will use the site each day as part of construction of M4M5 Link. HOW IS THIS POSSIBLE? why are the already acknowledged impacts being ignored.
- The original objectives of the project specified improving road and freight access to Sydney Airport and to Port Botany. Neither Stage 2 or 3 provides such access. Both the new M5 and the new M4-M5 Link will dump 1,000s more per day onto the roads to the Airport which are already at capacity.

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: Jim Tosecki

Signature: 

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

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

Address: 20 CAMDEN 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

- ✦ This EIS provides no basis on which to approve such a complex project including the building of interchanges underneath Sydney suburbs Rozelle and Leichhardt. It would be absurd to approve the building of up to three tunnels under people's homes on the basis of such flimsy information.
- ✦ The 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
- ✦ All of the streets abutting Darley Road identified as NCA 13 (James Street to falls Street) should have a blanket prohibition on any truck movements and worker contractor parking. These hoems 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. These streets are not constructed for heavy vehicle movements and on this basis should also be ruled out. The EIS needs to prohibit outright truck movements including parking) and worker parking on all of these streets.
- ✦ The social and economic impact study fails to record the great concern for valued Newtown heritage
- ✦ I object to the fact that the WestConnex Traffic Model has not been released to Councils and the community.
- ✦ Insufficient time has been given for the community to prepare submissions to the EIS, especially when one considers that whole neighbourhoods affected by the project were not even notified during the concept design period. e.g Newtown, east of King St.
- ✦ 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.

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: Emma Smart
	Address: 2/319 Victoria Place
Application Number: SSI 7485	Suburb: Dummayne Postcode 2047
Application Name: WestConnex M4-M5 Link	Signature: [Signature]
Please include my personal information when publishing this submission to your website. Declaration: I HAVE NOT made any reportable political donations in the last 2 years.	

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

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

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: Emma Smay

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: 21319 Victoria Place

Suburb: Dumma Postcode: 2047

Submission to:

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

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

- The 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 construction and operation of the project will result in 51 property acquisitions. We object to the project in its entirety because of this impact. We note that a number of long-standing businesses have been acquired and that many families and businesses in earlier stages have been forced to go to court to seek fair compensation. We object to the acquisition in particular of the Dan Murphys site. The business was substantially renovated and a new business opened with full knowledge of the likely acquisition. We object to it being acquired and compensated in this circumstances and call on the Government to investigate the circumstances which led to this occurring (Executive Summary xvii)
- One toll road leads to another 3 being proposed. The EIS's for the M4 East and the New M5 argued the case that serious congestion created near interchanges would be solved once the M4/M5 was built. Now it seems this is not the case and more roads will be needed to relieve the congestion – WHERE DOES THIS END? According to the M4/M5 EIS the real benefits will depend on building the Western Harbour Tunnel, the Airport Link and a tollway heading South. None of these projects have been planned, let alone approved but yet are part of addressing the congestion impacts acknowledged for the M4/M5 link project. Given this how is it possible to know or address the impacts of the M4/M5 Link, unless this is just yet more justification for yet more roads?
- The RMS has previously identified the Darley Rd site in Leichhardt as the third most dangerous traffic hazard in the Inner West. The NSW Land and Environment Court found that the location of the site couldn't safely deal with 60 bottle truck movements a week, but the M4/M5 EIS shows that more than 800 vehicles including hundreds of heavy ones will use the site each day as part of construction of M4M5 Link. HOW IS THIS POSSIBLE? why are the already acknowledged impacts being ignored.
- The original objectives of the project specified improving road and freight access to Sydney Airport and to Port Botany. Neither Stage 2 or 3 provides such access. Both the new M5 and the new M4-M5 Link will dump 1,000s more per day onto the roads to the Airport which are already at capacity.

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>Emma Smart</u>	Planning Services,
Signature: <u>[Signature]</u>	Department of Planning and Environment
	GPO Box 39, Sydney, NSW, 2001
Please include my personal information when publishing this submission to your website	Attn: Director – Transport Assessments
Declaration : I HAVE NOT made any reportable political donations in the last 2 years.	Application Number: SSI 7485 Application
Address: <u>3/319 Victoria Place</u>	Application Name: WestConnex M4-M5 Link
Suburb: <u>Dumma</u> Postcode: <u>2047</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.

- ✦ 1.1599 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 _____

Submission from:	Submission to:
Name: <u>Alex Bartol</u>	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature: <u>AB</u>	Attn: Director – Transport Assessments
Please include my personal information when publishing this submission to your website Declaration: I HAVE NOT made any reportable political donations in the last 2 years.	Application Number: SSI 7485 Application
Address: <u>15/1362 Meadow Rd</u>	Application Name: WestConnex M4-M5 Link
Suburb: <u>Alexandra</u> Postcode: <u>2015</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. 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
2. The EIS states that spoil haulage hours will be restricted but ignores the fact that the same was promised for the M4 East but these promises have been ignored repeatedly.
3. The EIS states "Direct and indirect traffic disruptions are likely to be experienced on local and arterial roads in most suburbs that are in close proximity to construction sites. This would include the suburbs of Ashfield, Haberfield, St Peters, Camperdown, Annandale, Lilyfield, Leichhardt, and Rozelle." Despite this finding, the study then pushes these negative impacts aside as inevitable. There is never any evaluation of whether in the light of the negative impacts an alternative public infrastructure project might be preferable.
4. The impacts on The Crescent and Annandale are massive and were not sufficiently revealed in the Concept Design to enable residents to give feedback on the negative impacts on communities and businesses in the area.
5. 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.
6. Table 6.1 in Appendix Q (Social and Economic impact) is not an accurate report on the concerns of residents. It downplays concerns of Newtown, St Peters and Haberfield residents. It does not even mention concerns about additional years of construction in Haberfield and St Peters. The raises the question of whether this is a result of the failure of SMC to notify impacted residents including those on the Eastern Side of King Street and St Peters about the potential impacts of the M4 M5
7. The EIS identifies a risk to children from construction traffic at Haberfield School. I find such risks unacceptable and am not satisfied with a promise of a Plan to which the public is excluding from viewing or providing feedback until it is 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 _____

<p>Attention Director Application Number: SSI 7485</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>Avan Mahenthirarajah</u></p> <p>Signature: <u>[Signature]</u></p> <p>Please include my personal information when publishing this submission to your website. I HAVE NOT made reportable political donations in the last 2 years.</p> <p>Address: <u>136 Doncaster Avenue</u></p> <p>Suburb: <u>Kensington</u> Postcode: <u>2033</u></p>
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I submit my objection to the WestConnex M4-M5 Link proposals for the reasons stated below, and request the Minister reject the application entirely, and cause the proponents to reissue an EIS that is based on a fully researched, developed, and budgeted concept design, and require the proponents to prepare a new business case against that design.

- The 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.
- 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.
- I am concerned that while hundreds of impacts on resident, including noise, loss of business, dust, and lost time through more traffic congestion, are identified in the EIS, the approach is always to recommend approval and promise vague 'mitigation' in the future. This is not good enough.
- The EIS acknowledges that visual impacts will occur during construction. However it does not propose to address these negative impacts in the design of the project. This is unacceptable and the EIS needs to propose walls,, plant and perimeter treatments and other measures at appropriate locations to lessen the impact on visual amenity. (Executive Summary xviii)
- The 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.
- 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 ?

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Name _____ Email _____ Mobile _____

<p>Attention Director Application Number: SSI 7485</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>Maya Gonzalez</u></p> <p>Signature: <u>M Gonzalez</u></p> <p>Please include my personal information when publishing this submission to your website. I HAVE NOT made reportable political donations in the last 2 years.</p> <p>Address: <u>17 Dickson St</u></p> <p>Suburb: <u>NEWTOWN</u> Postcode <u>2042</u></p>
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I object to the WestConnex M4-M5 Link proposals for the following reasons:

- I. The volume of extra heavy traffic in the Rozelle area and the acknowledged impact this will have on local roads is completely unacceptable to me.
- II. The social and economic impact study fails to record the great concern for valued Newtown heritage
- III. 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.
- IV. The consultants for the Social and Economic Impact study is HillPDA. This company has a conflict of interest and is not an appropriate choice to do a social impact study of WestCONnex. Amongst its services it offers property valuation services and promotes property development in what are perceived to be strategic locations. HillPDA were heavily involved in work leading to the development of Urban Growth NSW and the heavily criticised Parramatta Rd Study. It is not in the public interest to use public funds on an EIS done by a company that has such a heavy stake in property development opportunities along the Parramatta Rd corridor. One of the advantages of property development along Parramatta Rd that Hill PDA promotes on its website is the 33 kilometre WestCONnex.
- V. The EIS acknowledges that extra construction traffic will add to travel times across the Inner West and have a negative impact on businesses in the area. No compensation is suggested. These impacts are not been taken into account of evaluating the cost of WestCONnex.
- VI. The EIS acknowledges that 'rat running' by cars to avoid added congestion and delays caused by construction traffic will put residents at risk. No only solution is a Management Plan, which is yet to be developed, and to which the public will have no impact. This is completely unacceptable.
- VII. The EIS refers to be construction impacts as being 'temporary'. I do not consider a five year construction period to be temporary.
- VIII. Table 6.1 in Appendix Q (Social and Economic impact) is not an accurate report on the concerns of residents. It downgrades the concerns of Newtown, St Peters and Haberfield residents. It does not even mention concerns about additional years of construction in Haberfield and St Peters. It also does not mention concerns about heritage impacts in Newtown. I can only assume that this is because there was almost no consultation in Newtown and a failure to notify impacted residents including those on the Eastern Side of King Street and St Peters.

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Name _____ Email _____ Mobile _____

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

Name: LUKE JOSEPH MORGAN

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: 179 CHURCH STREET

Suburb: CAMPERRON Postcode: 2050

Submission to:

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

Attn: Director – Transport Assessments

Application Number: SSI 7485

Application Name: WestConnex M4-M5 Link

- ◆ The EIS states that after the M4-M5 opens, that traffic on Darley Road will increase by 4%. There is no benefit in the overall project for residents. During construction westbound traffic will increase on Darley Road by 37%. This increase in traffic for a period of up to five years will make it hazardous to cross the road and access the light rail and travel to Blackmore oval, the bat run, the dog park and the Leichhardt pool. In addition, it will drastically increase both local traffic and outer area traffic at peak commute times. We therefore object to the location of this site based on the unacceptable traffic impacts it will have on road users and on residents.
- ◆ 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.
- ◆ 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.
- ◆ Unfiltered stacks anywhere in Sydney are not unacceptable. There must be a review of the NSW government's unacceptable policy on this issue. I am appalled that the ex Minister for Planning Rob Stokes who approved the New M5 and unfiltered stacks in St Peters and Haberfield would declare that he would not have them in his own area. How can residents have any trust in a process that is underpinned by such hypocrisy.
- ◆ Targets for renewable energy and carbon offsets are not aligned with NSW government policy. (Table 22-8)
- ◆ The operational Green House Gas (GHG) assessment is based on the WestConnex Road Traffic Model version 2.3 (WRTM v2.3). This model has major flaws and the unreliable outputs of the model put into question the GHG assessment.

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Name _____ Email _____ Mobile _____

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <i>Maddison O'Brien</i>
	Address: <i>183b Parramatta Rd</i>
Application Number: SSI 7485	Suburb: <i>Annandale</i> Postcode <i>2038</i>
Application Name: WestConnex M4-M5 Link	Signature: <i>MO'Brien</i>
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.

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| <p>a) The increased amount of traffic the M4-M5 Link will dump on the roads to and from the St Peters, Haberfield and Rozelle Interchanges will disrupt local transport networks including bus and active transport (walking and cycling)</p> <p>b) There are overlaps in the construction periods of the New M5 and M4 of up to one year. This will significantly worsen impacts for residents close to construction areas. No additional mitigation or any compensation is offered for residents for these periods. (Executive Summary xxvii). It is unacceptable that residents should have these prolonged periods of exposure to more than one project. The EIS makes no attempt to measure or mitigate the cumulative impact of these prolonged periods of construction noise exposure.</p> <p>c) Out of hours work – Pyrmont Bridge Road site – Up to 14 'receivers' at this site are predicted to have impacts from high noise impacts during out of hours work for construction and pavement works for approximately 2 weeks caused by the use of a rock-breaker. Again, no plans to relocate or compensate residents affected is provided in the EIS (EIS, XV) The only mitigation contained in the EIS is that the use of the road profiler is to be limited during out of hours works 'where feasible.' (Table 5-120) In other words, there is no mitigation whatsoever for residents affected by daytime noise and a possibility that they will be similarly affected out of hours where the contractor considers that it isn't feasible to limit the use of the road profiler. This represents an inadequate</p> | <p>response to managing these severe noise impacts for residents.</p> <p>d) Targets for renewable energy and offsets are unclear</p> <p>e) Noise from trucks entering and exiting the site – Pyrmont Bridge Road site – The EIS states that there will be noise 'exceedances' for trucks entering and exiting the site (Table 5-120) No detail is provided as to the level of any such 'exceedance'. Nor does it propose any mitigation other than investigations into 'locations' where hoarding above 2 metres can be utilized to control trucks in the queuing area. This does not result in any firm plans to manage the noise. Nor is enough detail provided so that those affected can comment on the effectiveness of this proposed mitigation measure</p> <p>f) Increased traffic on Bridge Road, Wattle Street and the Western Distributor will reduce the amenity and value of the investment in the renewal of the Fish Markets and renewal of the Bays Market District</p> <p>g) Despite the promise of the WestConnex business case, Parramatta Road remains a barrier to urban revitalisation. There is no discussion of this commitment in the EIS.</p> |
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Name _____ Email _____ Mobile _____

Submission from:	Submission to:
Name: <u>Maddison O'Brien</u>	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature: <u>M O'Brien</u>	Attn: Director – Transport Assessments
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.	Application Number: SSI 7485 Application
Address: <u>183b Parramatta Rd</u>	Application Name: WestConnex M4-M5 Link
Suburb: <u>Annandale</u> Postcode: <u>2038</u>	

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

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

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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: Rebecca Lumbroso

Signature: Rebecca Lumbroso

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

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

Address: 14 Lennox St

Suburb: Normanhurst Postcode: 2076

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

- ◇ No need for 'dive' site – Leichhardt. There is no need for the Darley Road site, other than a time saving (tunneling) of several months. It is unacceptable that the community should be forced to endure 5 years of severe disruption to accommodate the timetable of the private contractors. The EIS should not be approved on the basis that it contains provision for the Darley Road site without any proper justification as for its need.
- ◇ Rozelle Interchange and surrounds will experience **increased traffic with associated noise and air pollution**– most particularly at the **Crescent, Johnson St and Catherine St**, Annandale/Lilyfield/Leichhardt and **Ross Street**, Glebe. These streets are already highly congested at peak times and with a massive number of extra truck movements and traffic associated with construction, these streets will become gridlocked during peak times.
- ◇ The EIS does not mention the impact of aircraft noise and its cumulative impact. As such, the noise levels identified are misleading. I object to the selection of the Darley Road site because of the unacceptable noise impacts it will have on surrounding homes and businesses.
- ◇ 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.
- ◇ 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)
- ◇ The EIS states that 'a preferred noise mitigation option' would be determined during 'detailed design'. This is unacceptable and residents have no opportunity to comment on the detailed designs. The failure to include this detail means that residents have no idea as to what is planned and cannot comment or input into those plans. (Executive Summary xvi)
- ◇ For example, the AECOM EIS for the New M5 failed to deal with how the massively contaminated land fill at Alexandria would be managed during construction. After months of sickening odours, the NSW EPA admits that despite fining SMC and requiring contractors to take measures to control odours, they have not stopped. It acknowledges that it does not have the power to stop work until WestConnex contractors comply with environmental regulations.

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Name _____ Email _____ Mobile _____

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <i>Stephen Kuehn</i>
	Address: <i>365 cabbage tree Road</i>
Application Number: SSI 7485	Suburb: <i>Williamstown</i> Postcode <i>2318</i>
Application Name: WestConnex M4-M5 Link	Signature: <i>S Kuehn</i>
<p align="center">Please <u>include</u> my personal information when publishing this submission to your website Declaration: I HAVE NOT 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:

- i. 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.
- ii. 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.
- iii. 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.
- iv. 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.
- v. 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.

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Name _____ Email _____ Mobile _____

Submission from:	Submission to:
Name: <u>Denise Highlands</u>	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature: <u>Denise Highlands</u>	Attn: Director – Transport Assessments
Please include my personal information when publishing this submission to your website Declaration : I HAVE NOT made any reportable political donations in the last 2 years.	Application Number: SSI 7485 Application
Address: <u>88a Enghienville Rd</u>	Application Name: WestConnex M4-M5 Link
Suburb: <u>Enghienville</u> Postcode: <u>2043</u>	

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

1. 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.
2. The EIS permits trucks to access local roads in exceptional circumstances which includes queuing at the site. Given the constraints of the Darley Road site queuing will be the usual situation. The EIS needs to be amended to remove queuing as an exceptional circumstance. The truck movements should properly managed by the contractor so that there is no queuing. This exception will make it easier for contractors to neglect their obligation to monitor and manage truck movements in and out of the site and needs to be removed. The EIS needs to specifically mention all local streets abutting Darley Road and expressly prohibited truck movements (including parking) on these streets. This should include all streets from the north (James St) to the south (Falls Road), which are near the project footprint.
3. Streets in Haberfield would be subject to heavy vehicle traffic for a further four years, making at least 7 years of heavy impacts on a single suburb. The answer is not a "community strategy". Residents who believed that their pain would be over after the M4 east are now being asked to sustain a further four years of impacts. No compensation or serious mitigation is suggested.
4. The EIS states that investigation would be undertaken to confirm whether the Victoria Road bridge is a potential roost site for microbats. There will be attempts to 'manage potential impacts' if confirmed. This is inadequate. The project should not be permitted to impact on vulnerable species.
5. 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.

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>Denise Weelands</u>	Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001
Signature: <u>[Signature]</u>	Attn: Director – Transport Assessments
Please include my personal information when publishing this submission to your website Declaration: I HAVE NOT made any reportable political donations in the last 2 years.	Application Number: SSI 7485 Application
Address: <u>83a Erskineville Rd</u>	Application Name: WestConnex M4-M5 Link
Suburb: <u>Erskineville</u> Postcode: <u>2043</u>	

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

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

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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: Denise Heelands
 Signature: Denise Heelands

Submission to:

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

Attn: Director - Transport Assessments

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

Application Number: SSI 7485

Address: 83a Erskineville Rd

Application Name:
 WestConnex M4-M5 Link

Suburb: Erskineville Postcode: 2043

1. The project fails to address its most fundamental objective of connecting to Port Botany, the genesis of the entire enterprise
2. Noise impacts - Pyrmont Bridge Road site - The EIS indicates that residents will be subjected to severe noise impacts for up to 4 months, caused by the long-term construction work proposed for this site which includes 8 weeks to demolish buildings, followed by 6 weeks to establish construction facilities, with pavement and infrastructure works required (EIS, 10-112) The EIS contains limited mitigation proposed to manage such impacts.
3. Volumes on the main links (the trunks) cannot be as high as what is claimed in the EIS. It is physically untenable.
4. 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
5. Because the strategic model does not limit the volume on road links and at intersection to their ceiling capacity; it cannot (and was not designed to) be used precisely as it is. A mesoscopic model, which can provide more a far greater level of detail than the strategic model used would have ensured a more thorough analysis of the networks' ability to cope with the traffic predicted.
6. The EIS focusses on the impact of construction traffic during commuter peak-hours. Given the EIS notes that construction-related vehicles will be limited during peak-hours, information should be provided on the impact of construction-related vehicles when both traffic volumes are higher - in particular during weekday lunch peak and Saturday lunch peak for sites like the Pyrmont Bridge Road Tunnel Site where operations are proposed 24/7. (Tables 8-46, 8-47, 8-48, 8-51, 8-52, 8-53).
7. The EIS does not require an acoustic shed and states that 'Acoustic barriers and devices at the access tunnel entrances would be considered and implemented where reasonable and feasible to minimise potential noise impacts associated with out-of-hours works within the tunnels.'
8. SMC have made it extremely difficult for the community to access hard copies of the EIS. The local Glebe library only has one copy and this is the situation at other local libraries. There are very limited hours of access to these locations outside normal working hours. Access to the EIS is very difficult without access to a personal computer. This totally restricts open community engagement.

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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: Dennis Weelands

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: 83a Erskineville Rd

Suburb: Erskineville Postcode: 2043

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

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

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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: Denise Weelands

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: 83a Erskineville Rd

Suburb: Erskineville Postcode 2043

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.

- 1) 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.
- 2) The EIS states that spoil handling at the Pyrmont Bridge Road Tunnel Site (C9) will "occur 24 hours a day, seven days a week" for about four years. Given the land use surrounding the site is dense residential, what mitigation measures will be used to control noise, light spill, etc. outside normal business hours? Have alternative living arrangements and/or compensation been considered? (P 8-55)
- 3) The assessment of Strategic Alternative 3 (Travel Demand Management) should:
 - ◆ Identify key network capacity issues
 - ◆ Consider the opportunity for travel demand management measures to address the road network capacity constraints. The measure should aim to retime, re-mode or reduce trips that make less productive use of congested road space.
 - ◆ Draw on a process of multi-modal transport modelling and economic assessment to inform the analysis and assessment
- 4) The EIS does not provide appropriate parking for the estimated 100 or so workers that the EIS states will work every day at the site, while other equivalent sites have allocated parking for such workers (Northcote Civil site (150)) and Parramatta Road East Civil site (140). It is also noted that the EIS provides for loss of 20 residential parks on Darley Road. Local streets are at capacity already because of the lack of off-street parking for many residents and the Light Rail stop which means that commuters use local streets. The EIS states that workers 'will be encouraged to use public transport.' the EIS needs to mandate that no trucks or construction vehicles are to park in local streets. There needs to be a requirement that is enforceable that workers use the Light Rail stop which is adjacent to the site or a plan to bus in workers

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Name _____ Email _____ Mobile _____

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <i>Dennis Weelands</i>
	Address: <i>83a Erskineville Rd</i>
Application Number: SSI 7485	Suburb: <i>83a Erskineville</i> Postcode <i>2043</i>
Application Name: WestConnex M4-M5 Link	Signature: <i>Dennis Weelands</i>
<p>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.</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, and request the Minister reject the application.

Botany. Port Botany itself has questioned whether the current project provides any benefit to it.

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

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

III. The EIS states that the project will improve connection to the Sydney Airport and Port Botany.

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

IV. 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.

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

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Name _____ Email _____ Mobile _____

Denise Weelands

waratah83@gmail.com

83A Erskineville Rd

Erskineville NSW 2043 Australia

Your view on the application: I object to it

Attn: Secretary re WestConnex M4-M5 Link EIS, project number SSI 16_7485

I write to express my strong objection to the WestConnex M4-M5 Link EIS tollroad proposal.

Global experience of major toll roads demonstrates that these projects are enormously expensive and counter-productive. WestConnex will increase air pollution and global warming and encourage more car use, quickly filling the increased road capacity. It is not a sustainable solution to Sydney's congestion problem. The negative impacts on the health and well-being of local community's both in the construction and operation phases are unacceptable.

The fact that the State Government released this EIS just 2 weeks after submissions closed for comment on the M4-M5 Link Concept Design, undermines community confidence that this is a genuine consultation process.

The impending sale of over 51% of WestConnex means that the government will transfer the whole of WestConnex and the construction of M4-M5 Link project completely into the hands of a private company which will not give adequate protections to the community.

In particular I object to the M4-M5 Link because:

- 1) it will induce more traffic into the Inner West with increases in congestion on already highly congested major roads and increased congestion on local roads as commuters avoid the expensive tolls.
- 2) it will increase the negative health impacts by increasing toxic fine particle pollution especially in the vicinity of the unfiltered ventilation stacks which are located near schools and homes.
- 3) it will destroy the Rozelle to Balmain rail corridor thus removing the option for a rail link to the Balmain peninsula and the White Bay precinct.
- 4) it will impose significant and unsustainable tolls on western Sydney communities who will not have adequate public transport alternatives.
- 5) it will lead to the imposition of more clearways on high streets in the inner west which will destroy businesses and community amenity.
- 6) it will potentially damage significant aboriginal and non aboriginal heritage in the inner west.

Extra comments

I have read the Department's Privacy Statement and agree to the Department using my submission in the ways it describes. I understand this includes full publication on the Department's website of my submission, any attachments, and any of my personal information in those documents, and possible supply to third parties such as state agencies, local government and the proponent.

I have not made a reportable donation to a political party.

Yours sincerely,

Denise Weelands

Attention Director Infrastructure Projects, Planning Services, Department of Planning and Environment GPO Box 39, Sydney, NSW, 2001	Name: <i>Dinise Weelands</i>
	Address: <i>83 a Erskineville Rd</i>
Application Number: SSI 7485	Suburb: <i>Erskineville</i> Postcode <i>2043</i>
Application Name: WestConnex M4-M5 Link	Signature: <i>Dinise Weelands</i>
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.

provided so that the residents and experts can meaningfully comment on the impact.

1. *The M4-M5 Link enables the expansion of the WestConnex network to include the Western Harbour Tunnel, Beaches Link and M6. These motorway projects, were not part of the WestConnex business case and are not priority projects in any State or Federal roads plan.*
2. *The business case is fatally flawed in a number of ways :*
 - *It does not factor in the impact of longer total journey lengths on urban sprawl, which will have a flow-cost for infrastructure and servicing.*
 - *It includes benefits from WestConnex supporting more compact commercial land use when this is generally not the result of motorway investment, and is unlikely to be in the area served by Stage 3.*
 - *It does not attempt to cost the reductions in public transport, especially the loss of fare revenue.*
 - *Ancillary road projects necessitated by WestConnex, such as the potentially \$1BN Alexandria-Moore Park Connectivity Upgrade, should have been included in the Business Case.*
 - *Impact on property values, costs of noise during construction, and loss of business*

should all have been costed and included in the Business Case

- *Loss of heritage to the whole community (not just property owners) should have been included in the Business Case.*
3. *The Government is spending many billions of taxpayer dollars via Metro Rail to try and free itself of the restrictions of the City Circle that imposes a choke on the whole rail network, but is now replicating a the city circle with a 60km road network. It does makes sense to focus a rail network on the centre of the densest employment and residential area of Australia, with the greatest economic output per square kilometre. However, it is the antithesis of common sense, practicality, economic productivity, property value creation, environmental planning, social planning and basic transport planning to replicate it with more motorways.*
 4. *The Business Case for the WestConnex project (made up of the New M4, Iron Cove Link and Rozelle Interchange, M4-M5 Link, New M5, King Georges Road Interchange upgrade and Sydney Gateway was not adequate to justify moving to environmental impact assessment.*

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Name _____ Email _____ Mobile _____

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

Name: Dezise Weeland S

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: 83a Erskineville Rd

Suburb: Erskineville Postcode: 2043

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

- 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.
- The EIS asserts that the M4-M5 link would complete the orbital road network between western Sydney and the eastern gateways of Port Botany and Sydney Airport (p4.4). That orbital already exists in the form of the 110km Sydney Orbital - the M2, M7, M5, Eastern Distributor, Harbour Tunnel, Gore Hill Freeway and Lane Cove Tunnel.
- Generally the risk of settlement is lessened where tunnelling is more that 35m. In the Rozelle area the tunnel will be at 30m in the Brockley St & Cheltenham St area, and it will be less than that in the Denison St area. Also it is planned to have another layer of tunnels above that in the Denison St area. From the cross section diagram Vol 2B appendix E part 2 the suggestion is that this higher level of tunnels will be at no more than 12m. This is of major concern. Numbers of people in the ongoing construction of Stage 1 and 2 have suffered extensive damage to their homes costing thousands of dollars to rectify caused by vibration and tunneling activities and although they followed all the elected procedures their claims have not been settled. This is totally unacceptable. There is nothing addressing these major concerns in the EIS.
- The EIS was released just 12 days after the closing date for submissions to the Concept Design. This proves the Concept Design and the submissions were a sham. There were hundreds of posts on the interactive map and there were over thousand written submissions. There is no way these submissions could have been read, evaluated, their points integrated, and the 7500 page EIS edited, printed, checked and distributed in 12 days. The EIS was obviously prepared prior to the closing of submission to the Concept Design. This is a total abuse of the NSW Planning Laws.
- 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.

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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: Denise Weelands

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: 83 a Erskineville Rd

Suburb: Erskineville Postcode: 2043

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 Project focuses on 'catering for traffic growth' (P4.15). This contradicts and undermines the NSW Government's Long Term Transport Master Plan and Future Transport web site which commit to an integrated approach to congestion management focussed on land use planning, demand management, public transport investment and "a coherent whole of network planning strategy", essentially aiming for growth in public transport and containing road demand to that required to serve the freight and servicing tasks.
- B. The WestConnex route has changed significantly over time, even after the initial August 2013 Business Case was approved by the NSW Government but not made public. Therefore an Updated Business Case on an updated concept was published in 2015. SGS Economics and Planning undertook a detailed assessment of this and reached the following conclusions:
- Misrepresentation of the Benefit Cost Ratio (BCR) as 1.71 when it was 1.64.
 - The Business Case did not identify Stage 3 WestConnex, connecting the M4 to the M5, as a priority for "filling in the missing links in Sydney's motorway network".
 - Modelling for post-2031 conditions was not undertaken, however benefits were assumed to continue until 2052.
 - The transport modelling is likely to have underestimated the impact of extra traffic induced by the additional capacity, which would significantly reduce the BCR.
 - The Business Case did not reflect global approaches to congestion management, such as transit investment and demand management.
 - The Business Case suggested WestConnex would help renew Parramatta Road by reducing traffic on it, despite the modelling showing that many parts of it would carry more traffic, not less.
 - Travel time savings are a key component of the positive BCR. A significant proportion of these supposed benefits arise from travel time savings were within the margin of error of modelling, or would be so small that motorists may not notice them (and therefore would not value them).
 - Insufficient justification was provided for the significant travel time savings, and economic benefits, factored into the BCR for business and light commercial vehicles – for instance there was insufficient analysis of origins and destinations of these trips.
 - The construction costs appear too conservative – if these increase, the BCR would reduce accordingly.
 - Other costs were not accounted for, such as reduced amenity on urban development, loss of land for higher value activities, and the health costs of potentially reduced public transport use.
 - In summary, SGS suggested that the actual BCR of the project could be less than 1:1, with NSW taxpayers exposed to the risk that the project may not succeed.

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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: Denise Weyers

Signature: Denise Weyers

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: 32 Erskineville Rd

Suburb: Erskineville Postcode 2043

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. At very minimum, the assessment of Strategic Alternative 1 (improvements to the existing arterial road network) should:

- ◆ Identify key network capacity issues.
- ◆ Develop a scenario of investments in (potentially major) arterial road improvements required to address the road network capacity constraints. The City of Sydney's alternative scheme provides one example of what improvements to the existing arterial road network might look like.
- ◆ Carry out transport modelling and economic analysis to inform the assessment of the alternative.

B. I completely reject this EIS due to its failure to consider the alternative plan put forward by the City of Sydney.

C. 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.

D. It is obvious the NSW government is in a desperate rush to get planning approval for the M4/M5. It has only allowed 60 days for comment yet the M4/M5 project is the most expensive and complicated stage of WestConnex. Critically, it involves building three layers of underground tunnels under parts of Rozelle. Such tunnelling does not exist anywhere in the world and as yet there are no engineering plans for this complex

construction. Approval depends on senior staff in NSW Planning compliantly agreeing to tick off on the EIS, as was done with the New M5 and the M4. This demonstrates a wanton disregard for the safety of the residents of Rozelle and those who will be using the tunnel. WHAT IS THE RUSH?

E. 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.

F. 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.

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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

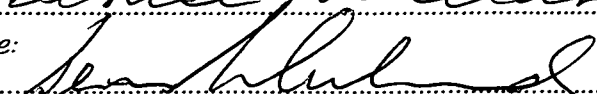
Application Name:

WestConnex M4-M5 Link

Name:

Denise Weelands

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:

83a Erskineville Rd

Suburb:

Erskineville

Postcode

2043

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. 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.
- II. 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.
- III. 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.
- IV. 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

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

Name: Denise Weelands

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: 83a Erskineville Rd

Suburb: Erskineville Postcode: 2043

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 Parramatta Road Urban Transformation project has been put on hold by the NSW Government for a number of reasons, including the uncertainties relating to traffic capacity on Parramatta Road following the construction of WestConnex. To claim this as a benefit is misleading. The project predicts increased traffic congestion on Parramatta Road without the transformation, which clearly is not a benefit, and potentially funnels traffic unable to penetrate the corridor into the privately operated toll road.
- (2) 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.
- (3) 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.
- (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) 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.

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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: Denise Weelands

Signature: Denise Weelands

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: 88 Erskineville Rd

Suburb: Erskineville Postcode: 2043

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 Darley Road site should be rejected because it involves acquiring Dan Murphy's. This business was rem-novated and opened with full knowledge that it was to be acquired. The lessee and sub-lessees should not be permitted compensation in these circumstances. The demolition of the entire building (which the EIS confirms will occur) is wasteful and represents mismanagement of public resources.
- b) 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.
- c) This EIS contains little or no meaningful design and construction detail. It appears to be a wish list not based on actual effects. Everything is indicative, 'would' not 'will', telling me nothing is actually 'known' for certain – and is certainly not included here.
- d) 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.
- e) 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.
- f) 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.

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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:

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 2043

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.

1. The EIS (including Appendix H) fails to provide traffic modelling outputs to assess impacts of the Project on CBD streets and intersections. Given the highly constrained and congested nature of the CBD, NSW Government policy focusses on reducing the number of cars in the CBD in favour of public transport, walking and cycling. The proponent should provide intersection performance results for the following intersections:
 - a) The ANZAC Bridge off-ramp to Allen Street/Botany Road
 - b) The Western Distributor off-ramp to Drutt Street (buses)
 - c) The Western Distributor off-ramp to Bathurst Street
 - d) The Western Distributor off-ramp to King Street/Sussex Street
 - e) Gardeners Road and Botany Road
 - f) All intersections within the modelled area in the Sydney CBD
2. The traffic model used is an 'unconstrained' model. It assumes that all vehicles will travel on the route with the lowest "generalised cost" (i.e. combination of time and money). But it does not consider whether those routes have the capacity to handle all those vehicles. In the real world people change their time of travel, mode of travel and consider whether to make a trip at all to avoid congested routes. As a result travel patterns in the real world are very different to the patterns identified in models.
3. Better use of existing road infrastructure has not been analysed as a feasible alternative. The EIS only refers to existing RMS programs. An analysis of urban road projects recommended in the State Infrastructure Strategy Update 2014 should be conducted as strategic alternatives including:
 - a) Smart Motorways investments on the M4, the Warringah Freeway and Southern Cross Drive-General Holmes Drive
 - b) Upgrading the Sydney Coordinated Adaptive Traffic System (SCATS)
4. The EIS refers to benefits from road projects that are not part of the project's scope. The full costs, benefits and impacts of these projects need to be considered in a transparent process.

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: Denise Woodlands

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: 83a Erskineville Rd

Suburb: Erskineville Postcode: 2043

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 Darley Road site will not be returned after the project, with a substantial portion permanently housing a Motorways Operations facility which involves a substation and water treatment plant. This means that the residents will not be able to directly access the North Light rail Station from Darley Road but will have to traverse Canal Road and use the narrow path from the side. In addition the presence of this facility reduces the utility of this vital land which could be turned into a community facility. Over the past 12 months community representatives were repeatedly told that the land would be returned and this has not occurred. We also object to the location of this type of infrastructure in a neighbourhood setting.
- B. 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.
- C. The consultants for the Social and Economic Impact study is HillPDA. This company has a conflict of interest and is not an appropriate choice to do a social impact study of WestCONnex. Amongst its services it offers property valuation services and promotes property development in what are perceived to be strategic locations. HillPDA were heavily involved in work leading to the development of Urban Growth NSW and the heavily criticised Parramatta Rd Study. It is not in the public interest to use public funds on an EIS done by a company that has such a heavy stake in property development opportunities along the Parramatta Rd corridor. One of the advantages of property development along Parramatta Rd that Hill PDA promotes on its website is the 33 kilometre WestCONnex.
- D. 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.

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: Denise Weeglands

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: 83a Erskineville Rd

Suburb: Erskineville Postcode: 2043

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

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: Denise Weeland
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: 83a Erskineville Rd
Suburb: Erskineville Postcode 2043

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) Other planning issues are excluded from cost-benefit analysis, which is a key component of developing a business case:
- ✦ No analysis of equity impacts of the infrastructure investment and the tolling regime, given the lower socio-economic status of many areas of Western Sydney, and the requirement for potential users of WestConnex to own or pay for access to a private vehicle to be able to use it
 - ✦ The localised impact of air quality around the ventilation outlets should have been accounted for.
 - ✦ Impacts associated with loss of amenity from reduced access to open space should have been accounted for.
- b) Lack of ability to comment on the urban design as part of the approval process - The EIS does not provide any opportunity to comment on the urban design and landscape component of the project. It states that 'a detailed review and finalisation of the architectural treatment of the project operational infrastructure would be undertaken ;during detailed design'. The Community should be given an opportunity to comment upon and influence the design and we object to the approval of the EIS on the basis that this detail is not provided, nor is the community (or other stakeholders) given an opportunity to comment or influence the final design.
- c) 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.
- d) The EIS social an economic impact study acknowledged the high value placed on retaining trees and vegetation in the affected area but does not mention that WestCONNex has already destroyed more than 1000 trees in the St Peters Alexandria area around Sydney Park alone.

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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: BECON UTHWE

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: 43 HARDEN 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

- ✦ 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.
- ✦ Acoustic shed - Pyrmont Bridge Road site - Despite setting out the noise impacts of construction at this site, the lowest grade acoustic shed is proposed as mitigation. The EIS states that the Acoustic shed performance should be 'upgraded' and the site hoarding increased to 4 metres 'in select areas.' (EIS, 10-119). No detail is provided as to how effectively these enhancements will manage the noise and vibration impacts of construction.
- ✦ 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
- ✦ Of the six areas of disturbance and 11 Historical Archaeological Management Units (HAMUs) identified in Chapter 20 of the EIS, none are within the Sydney LGA.
- ✦ Map 2 in Vol 1A Chap 5 Pt 1 shows four intersecting tunnels, each 3 lanes wide, with four toll locations, apparently converging under Mayes, Young, Ferris, Moore, Catherine,

Hill, John, Emma, Styles, Ilka, Paling, and the many other surrounding streets. The construction of four intersecting tunnels at varying depths in a spaghetti junction network would exacerbate ground settlement and vibrations, and cause homes most of which are Federation or earlier above the Interchange to be seriously impacted.

- ✦ The EIS states that the impact on regional air quality is minimal and thus concludes that the project's impact on ozone is negligible. Ozone is a major pollutant and Western Sydney, Campbelltown in particular, suffers the worst ozone pollution. Major components of ozone are generated in eastern Sydney and drift west. Previous environment departments have spoken about the need for an eight-hour standard concentration and goal for ozone (DECCEW, 2010, State of Knowledge: Ozone). OEH needs to provide information about the value of this standard and on the impact of new motorways on that level.
- ✦ The EIS (App H, p.269) refers to the RMS plans to carry out "network integration" works surrounding the Rozelle interchange once the project is complete but offers little detail of the nature of the works. It mentions the intersection of the Western Distributor and Pyrmont Bridge Road at Pyrmont, Western Distributor near Darling Harbour and a review of kerbside uses near Western Distributor, The Crescent, Johnston Street and Ross Street.

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: Angelia Brewario

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: 1/197-207 Wilson 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 Name: WestConnex M4-M5 Link

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

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

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

D. The removal of spoil at the Rozelle Rail Yards will lead to the largest amount of Spoil truck

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

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

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

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 Angelia Email ahre.2263@gmail.com Mobile _____