

I have the following feedback in relation to the Westconnex M5 King Georges Road Interchange EIS which is currently on exhibition. A number of the comments below highlight gaps in either overall or specific areas of assessment. These gaps should be addressed prior to any determination of the project to ensure that the environmental planning process is as robust as it should be.

General

1. The alternatives given in the EIS only focus on 'do nothing' or 'defer delivery as part of Westconnex' and does not provide alternatives to Westconnex itself or alternatives to free up congestion at the KGR interchange through other means than widening of the existing road. This forms the basis for all discussion about alternatives throughout the EIS whenever the proposed scope of the project is compared to the alternatives. To properly meet the objective of an EIS to consider alternatives, options other than 'do nothing' or deferring the timing of the road widening should be included so that the EIS is not flawed on a fundamental basis.
2. Throughout the EIS there are references to the KGR upgrade as a standalone project in some sections and in other sections of the EIS it is referred to as part of Westconnex. This inconsistent approach means that in some sections justification for the project is to assist in delivery of Westconnex, in others it is justified as a separate piece of work. In some sections this appears to be a way of highlighting the best possible justification for each aspect and associated impacts rather than providing a comprehensive/integrated approach to the assessment.
3. There is no mention of the proposed second airport and what this might do to alleviate traffic predictions into/out of the existing airport and port.
4. The economic analysis in section 3.4 states that the benefits would outweigh initial upfront construction costs and ongoing operational costs but does not provide detail on this. How much has it been assessed as outweighing it by?

Traffic and transport

5. Section 3.3.1 states that there are no regular bus routes along the M5, however the development of a busway along the M5 is not explored as an opportunity to reduce the numbers of commuter cars on the road and therefore free up space for freight vehicles. There is also no discussion about opportunities for moving passengers in commuter cars onto rail services to allow more freight vehicles to use the existing road.
6. The assessment methodology in section 8.1.1 only considers predictions with the proposed project or without the proposed project and does not include other alternatives. This significantly limits the methodology.
7. Section 8.1.3 doesn't detail the proportion of freight vs car traffic, making it hard to determine the impacts of each type of traffic within the scope of the EIS.
8. How does the Sydney Strategic Transport Model referred to in section 8.1.1 account for changes in travel patterns over time ie less reliance on cars due to increased public transport, increased cost of fuel, consideration of environmental impacts by drivers?

Noise and vibration

9. In section 8.2.3 the project is defined as redevelopment of an existing road for the purpose of the EIS, but is clearly referred to as part of Westconnex in other areas of the EIS. This is an inconsistent approach to assessment.

Socio-economic

10. The assessment of socio-economic impacts in section 9.2 is patchy. The business and employment portion references Westconnex, whereas other areas of this assessment only focus on the project itself, for example local amenity, community values, access and connectivity. This gives the impression that the EIS has been developed to support the justification for going ahead with Westconnex as much as possible without fully assessing all potential impacts of the Westconnex in areas where there will be significant changes such as local amenity and community values.
11. All socio-economic environmental management measures in section 9.2.4 are related to construction and none provided for operation, this contradicts the descriptive paragraph above which indicates that management measures would be developed for operation. For completeness, operational measures should be considered and stipulated.

Air quality

12. Page 22 references community concerns about air quality for the existing M5 tunnel and that a filtration trial has been carried out, however the assessment of air quality in section 9.6 does not refer to this at all or provide any analysis.
13. Section 9.6 uses information from all OEH stations to make a general statement about air quality in NSW and Sydney – there is no local baseline assessment provided despite a comparison being made between predicted impacts and the current situation. Information from local OEH stations, project specific air quality monitoring plus concerns about the air quality for the existing M5 tunnel should be used as a minimum starting point to develop a baseline to compare predicted impacts against.

Cumulative impacts

14. The section on cumulative impacts is very limited in its scope. For example, section 9.11.2 does not consider cumulative impacts of the full Westconnex project, only the future Westconnex M5 portion. Even then, the potential key issues where there may be cumulative impacts are only listed and are not fully assessed. This is inadequate.
15. Section 9.11.3 refers to “connections to St Peters and airport”, rather than specifically to a tunnel to St Peters which has just been formally announced by Federal and State Governments. Without more in depth analysis of cumulative impacts, including the scope of proposed subsequent stages, this section does not meet the requirements of providing an adequate cumulative impact assessment.
16. Table 9-15 only compares the project’s lower impact on air quality with the higher impact of Westconnex M5 portion, rather than a cumulative assessment of the full Westconnex against existing conditions.
17. The environmental management measures for cumulative impacts only relate to consultation with the community and other proponents, and does not include any more scientific measures such as objective assessment of potential cumulative impacts.

Sustainability

18. Table 10-1 doesn't provide any measures to reduce greenhouse gases, only refers to sources and quantities which does not fully address the action from the policy framework as listed.
19. Table 10-1 only mentions noise pollution and does not mention potential air pollution. For a road project this is inadequate.
20. Table 10-1 Climate change resilience – only mentions potential impact of sea level rise on the project area, no discussion of whether increasing road transport is appropriate
21. ESD considerations in section 10.3 only mention project, not other portions or the full Westconnex. Likewise, the assessment against the objects of the EP&A Act only discusses the project, not full Westconnex. Given the significance of environmental impacts that are likely to come with the proposed Westconnex project, this omission needs to be addressed.
22. Table 10-2 does not cover economic benefits to future generations in the discussion on intergenerational equity. Given the proposed economic cost and environmental impact from the Westconnex project, this needs further detail.
23. Table 10-2 states that potential impacts to air quality would generally be restricted to construction. This is incorrect as a road has significant potential operational impacts to air quality not just at the time of opening but for future generations.