Submission from the Westconnex Action Group to the Sydney Gateway SSI-9737

The WestConnex Action Group is a community group with members and supporters living in suburbs affected by all stages of WestConnex and the Sydney Gateway.

We strongly OBJECT to this Sydney Gateway EIS and do not think it provides a basis for the approval of the project.

We were opposed to the whole Westconnex project because we do not believe it will contribute to a solution to traffic congestion in Sydney. Along with local government stakeholders and other community groups, we are concerned about the lack of consideration of alternative solutions. Our multiple submissions regarding the onerous construction and operational impacts of these projects on communities have not been previously heeded. We do not expect this to occur now.

Our group has been shocked and horrified by the impacts of the project on thousands of residents and school children, including many in St Peters. Now more people in Mascot and Tempe are at risk of facing the same impacts from the Sydney Gateway Project. The project and its operation will focus even more traffic and pollution on the Inner South West area, an area that already suffers from excessive noise, lack of open space and poor air quality.

Given the impact of prior road projects on St Peters, we were disappointed to see that the St Peters Community Preschool Inc. which is situated very close to the Ecotech monitor on the corner of Church and Campbell Street, was not included at all on the table of community receivers. This should be corrected. We don't know how many other community receivers have not been included in the list (Table 4.3 Technical Report Air Quality). The current levels near this receiver are discussed in more detail below. It is dismaying to see that the areas in which air quality will deteriorate.

The Sydney Gateway was originally part of WestConnex and was included in its cost. Around 2017 the Gateway disappeared without explanation from the WestConnex projects. and reappeared later as an additional project. The reasons for this and who was responsible for these decisions was not made public. This lack of transparency concerns our group.

As we write, we are in the middle of a climate change disaster with record levels of heat and particulate matter. Yet consideration of these factors and how it will impact on water, air and traffic receives no attention in this EIS.

Insufficient detail

There is insufficient detail about impacts and how they will be dealt with to enable the community to meaningfully respond, especially within the timeframe of one month. We do not consider that it is reasonable to have a deadline for feedback so close to the end of the year. The difficulty of dealing with the EIS are increased because significant details are buried in the EIS Technical reports.

We note that at various points in the EIS, the authors say that important details will be clarified at the 'detailed design stage'. Our group knows from experience that either this detail will never be made public or if it is made public, the community has no meaningful opportunity to respond.

Like thousands of others, in our early submissions to WestConnex, we called for a cumulative assessment of WestConnex. At this stage WestConnex included the Gateway. These calls were ignored. This stage by stage assessment project hides the overall impacts or dismisses the onerous cumulative impacts on communities, such as St Peters. In relation to air quality, predicted levels of daily exceedances and annual averages seem highly likely to be wrong as we move into 2020 but there is no to be attempt to explain the gaps in information or why this might be the case.

Glib phrases like 'construction fatigue' are used without examining the nature of this fatigue and how it might be impacting on mental and physical health.

Individual Stages of road projects are further broken down into further staged assessment, leaving communities disempowered and exhausted by a complaints process that does not work. From experience we now know that there may be major modifications to this project in the future and that even if substantial, these will be approved.

Socio and Economic factors.

WAG considers that the Social and Economic Impact statement for this EIS is completely inadequate and formulaic. This follows the pattern of previous major road project EIS.

These comments on the Business case for the Sydney Gateway explain some of the factors that are inadequately considered. The Business Case (http://www.infrastructure.nsw.gov.au/media/2154/sydney-gateway-program_final-business-case-summary.pdf) is premised on
a) doubling of container-based freight by 2036 and Port Botany remaining the principal sea freight dock,
b) asserting that air travel and air freight will increase through Sydney Airport, notwithstanding the opening of Western Sydney Airport in 2026,
c) duplicating the existing single freight rail line would not be sufficient to deal with the anticipated growth in freight.

These premises ignore a number of factors, including
a. the impact of the Western Sydney Airport on freight and passenger movement;
b. opening up Newcastle port to container freight movement, once coal exports are ended;
c. the potential for carbon emission reduction restraints on trade, including on air travel and transport of goods with high carbon emission costs.

To assume that business growth will return to the trends of previous decades seems optimistic given the global economy appears to have moved into a lower growth pattern. Certainly the Australian economy, like most of the developed countries, is caught in a low growth cycle. The increasing trend to protectionism and to bilateral trade agreements will impact the volume of trade without taking into account the impact of climate change.
Climate change is not identified as a business risk in the business case summary.

We note the impact of the worst drought in NSW's recorded history is compounded by the historically unprecedented scale of bushfire. Both will affect actual GDP and growth rates of the state in economic activity (a drop in agricultural produce exports and tourism) and in actual costs - loss of housing and other property, loss of income in regional centres, health costs from air pollution and heat, infrastructure upgrades and management plus associated costs to deal with limited water supplies.

As greenhouse gas emissions continue to rise, we cannot ignore that the "new normal" for NSW is longer and more severe droughts and longer and more severe bushfire seasons, with the impacts identified continuing. It is to be hoped those impacts will not be as bad nor as badly

planned for as at present. The most obvious effects of unmitigated climate change will be more frequent weather disasters, here and globally, which will have an adverse effect on international trade. It is rash to assume a "business as usual" basis for assessing growing volumes of trade requiring extension of freight transport.

Air Quality

The authors of this EIS report conclude: "*With implementation of the mitigation measures identified in this document, none of the identified impacts are considered to be significant."* This is the same conclusion that has been reached in WestConnex assessments.

WAG rejects this finding and the methodology that is used to reach it. It is not in line with available evidence. This conclusion should be scrutinised carefully by the EPA. NSW Planning should honestly address construction impacts and ask for more detail and evidence that the systems work. Information from a number of sources demonstrates that construction impacts can be very significant. The fact that this conclusion is trotted out shows that this EIS report is not based on an empirical open minded inquiry but predetermined conclusions.

This casts doubt on every other conclusion in the EIS.

Impacts on Air Quality during the construction phase.

The assessment is 'desk based' and even then is not adequate. Despite the fact that there have now been three full years of experience with construction of WestConnex, no reference is a huge documentation of impacts.

The NSW Parliamentary Committee found that impacts from WestConnex construction on St Peters and other suburbs have been very serious. (See the report of the Parliamentary Inquiry into the Impacts of WestConnex : https://www.parliament.nsw.gov.au/lcdocs/inquiries/2497/Final%20report%20-%20Impact%20of%20the%20WestConnex%20Project%20-%20FINAL%20-%2014%20December%202018.pdf)

One resident submitted to the Inquiry:

I have made numerous complaints about the lack of sediment and dust control in our area. There is no watering down of sites and streets. I have filmed these daily occurrences and sent the images to the EPA. I have received a response from Westconnex that stated that this was "trial and error" with the equipment used. For a $17 billion project there should be no such thing as trial and error. It is not trial and error in using a water truck to wash things down. These strategies such have been in place in the first instance.

Our homes are now covered in dust and it is impossible to maintain and do the upkeep on our properties. There is dust in every room of our house. There is construction dust in our cupboards. The clothes on the line are covered with construction dust. Everything combined is relentless. We have no escape from the noise, dust pollution, hydrogen sulphide and 24 hours works.'

I left Sydney on 24th April, 2018, having rented out my home at less than half the rent which would have been possible before Westconnex. Since I left my asthma symptoms have disappeared and my blood pressure has returned to safe levels. My GP in Sydney was considering prescribing medication to reduce my blood pressure,
After 2 months away it was normal and a further check by my London GP has now established it is now better than average for my age. Probably the most significant factor influencing my decision to leave St Peters has been the effects of air pollution, including, but not limited to:

- *offensive odours from the construction site (and I note that the EPA has now taken legal action re the offensive odours from the St Peters Interchange site in 2017)*
- *vehicle exhaust fumes ,*
- *dust which penetrates my home, exacerbates my asthma and forces me to spend far more time cleaning than has ever been needed since I moved to St Peters in 1984*

Another resident's doctor recommended that she withdraw her child from St Peters childcare centre after he experienced bronchial pneumonia. The doctor considered that his illness was exacerbated by the pollution.

There are many other first hand evidence of significant impacts that have not been 'fixed' by mitigation.

There is now a large amount of evidence that construction impacts can be serious, including on air quality. Currently, a giant experiment is being conducted on the residents of St Peters and Kingsgrove. (For figures see below.)

The Air quality EIS report for the New M5 also found that there would be construction impacts but that these would not be significant or if they were significant, the impacts could be mitigated. Residents have repeatedly found that pleas for mitigation have not worked. This situation has already gone on for years. The methodologies approved by Planning should be adapted when there is evidence that they don't work.

Our society should be able to achieve more in our environmental impact assessments than a desk-top routine procedure. Why can't the authors use concerns and findings about construction impacts repeatedly raised at the Parliamentary Inquiry, other Inquiries and in submissions by community groups and Local Councils to evaluate their risk assessment? One would expect some reference to the failure of the proposed approach to mitigation to be included or referred to in any honest assessment. We find the pre-emptive approach to be insulting to the many residents whose lives have been deeply impacted by major road projects. Although we are not experts, our reading of the document suggests there are high risks that the noise and air impacts on some residents, students and workers in the Inner South West will be severe. Given past experience, we are sceptical that these serious impacts will be mitigated.

Prior evidence of construction impacts is excluded.

WAG notes that in the description of **sources** of air pollution, construction impacts are not mentioned. The authors of this EIS had available to them all the monthly reports on the monitoring at St Peters School. We refer to the 2018 St Peters Pacific Environment reports in which analysts could only explain exceedances as a result of construction. These conclusions do not seem to have had any impact on the RMS.

While 2016 monitoring results for the St Peters School monitor have been included in the assessment for the operation of the project, other results from this monitor have been ignored. WAG has been able to draw on the analysis by two researchers who reviewed the monthly reports in detail and compared findings with the OEH regional monitoring results over the same period.

St Peter's School monitor in St Peters street was explicitly chosen because it should measure 'background' levels of pollution, not roadside pollution.
In an email to the SPPS Parents & Citizens WestConnex Subcommittee, WDA staff member Louise Bonney described the site as suitable because it was at least 50 metres from a busy road or car park. Another monitor on the corner of Princes Highway and Campbell Road was established to capture roadside pollution, but was decommissioned in April 2016 after only 9 months. Why was this? Why was monitoring not continued at this site?

Ms Bonney also assured parents: "This monitoring station will be a useful resource to the local community as it will give residents a better understanding of the air quality in their neighbourhood. The data may also be of benefit to the school from an educational perspective." If the community is expected to use the monitoring as a community resource, the WestConnex Action Group finds it astonishing that the full data is not used by experts (who we note are anonymous in this case) in their analysis of the impact of major projects.

Key findings from analysis of St Peters School monitor 2015 -2018 and comparison with OEH monitors in the Sydney basin.

- In 27 of 38 months, over 70% of months, between August 2015 to September 2018, St Peters Public School monitor recorded higher average PM 10 than any OEH Sydney Basin monitor. In 9 of the remaining 11 months, St Peters Public School was one of the five highest levels for PM 10..
- In 2017, the St Peters Public School monitor reported an average of 24.73 µg/m3 PM 10, just slightly under the national yearly limit of 25 µg/m3. This result was 42.2% higher than the average of OEH Sydney Basin monitors. The second highest was Parramatta North with 23.8 µg/m3 and the third highest was Liverpool with 20.79 µg/m3.

- From January 1–September 31 2018, PM 10 averaged 29.08 µg/m3 at the St Peters Public School monitor, trending towards well over the national yearly average limit of 25 µg/m3 for 2018. This PM 10 average is 48.5% higher than the OEH Sydney Basin wide average for the same period. No further reports have been published.

PM 2.5 Key findings:

The EIS acknowledges that the national goal of PM 2.5 is not likely to be attained. This is worrying but even more worrying for the community is that they are likely to be higher than predicted on the basis of all available evidence

- **In 2016 and 2017, PM 2.5 at St Peters Public School averaged 8.97 µg/m3 and 9.58 µg/m3 respectively, exceeding of the National Standard limit of 8 µg/m3 on average at a site over one year.** Monitoring was only established for five months of 2015, and PM 2.5 averaged even higher, at 11.92, during that period. 9 months of measurements for 2018 were released by Sydney Motorway Corporation, and over these months, PM 2.5 averaged 11.18 µg/m3.
- **Over the 38 months from August 2015 to September 2018, the average PM 2.5 at St Peters Public School was 34% higher than the average across all OEH Sydney Basin monitors: 10.41 µg/m3 compared to 7.77 µg/m3 (taken from monthly averages). This is the full period for which data has been released for the WestConnex SPPS monitor.**
- In 20 of 38 months, over 50% of months, between August 2015 and September 2018, the St Peters Public School monitor recorded higher average PM 2.5 than any OEH Sydney Basin monitor. In 10 of the remaining 18 months, St Peters Public School was in the top five for PM 2.5 monitors.
- The St Peters Public School monitor reported a monthly average PM 2.5 of more than 13 µg/m3 on eight occasions between August 2015 and September 2018. 3 of these instances were in 2018. In June 2017 the monitor reported an average PM 2.5 of 17.2 µg/m3; OEH Sydney Basin monitors averaged 7.98 µg/m3 in that month.
- For April, May, and June 2017, when the odours coming off St Peters Interchange were very strong due to inadequate control of leachate, the St Peters Public School monitor reported monthly PM 2.5 averages of 14.4, 14.2, and 17.3 µg/m3 respectively (see below section *Odours from St Peters Interchange - 2017*). We note that there is risk of emissions occurring from the old Tempe Landfill.

These are actual levels of pollution and they should be included in the EIS report as they were in the possession of RMS. Instead actual levels are obscured in an exercise that focuses on changes as a result of this project (a complex and uncertain issue) - the public needs to know the actual levels of pollution they are likely to experience and how this compares to the National Standard, with or without the project.

Towards the end of 2018, Pacific and Environment reports for SMC acknowledged that St Peters School averaged significantly above the nearby OEH monitors Chullora, Earlwood and Rozelle (although the latter was taken down for some months of 2018). Between August 2015 and September 2018, PM 2.5 has been recorded as 25.6% higher at the St Peters Public

School monitor than at these nearby monitors; for some months it has been over 50% higher. In April 2017, the average PM 2.5 was 14.4 µg/m3 at SPPS, more than 120% higher than the nearby OEH monitors.

In mid 2018, the Pacific Environment consultants preparing monthly air quality reports explicitly stated that construction impacts on local air quality have not been temporary, but have been sustained, suggesting that the predictions made in the EIS were wrong. In their June 2018 report, this note appeared in the last paragraph of the report:

It should be noted that concentrations will vary between the WestConnex sites and OEH due to the differing nature of the sites (e.g. roadside vs background). It is noted that PM2.5 and PM10 data for St Peters School site is consistently elevated compared with OEH stations nearby; this is suggested to be contribution from nearby construction activity [emphasis ours].

This same paragraph appeared in the July and August 2018 monthly reports. More exceedances occured in September but the sentence of explanation was excluded.

We wonder why?

Current actual levels of Air quality in St Peters

There are currently three Ecotech monitors in St Peters. One is near Canal Road, one on the corner of Campbell and Church Street (near the Princes Highway) and one on the premises of St Peters public school.
These monitors which have been operating all year, confirm residents' own assessments that the impact of construction and traffic is severe. They have been ignored altogether. The Proponent should be required to comment on and explain the data that is available to the community. The monitor results suggest that the 2016 results are not necessarily representative of current air quality, let alone a good guide to the future.

Currently the rolling average of air quality PM 10 at St Peters Interchange (Canal Road) is 40 ug/m3, Campbell/Church Street is approximately 30 ug/m3 and at St Peters School is approximately 25 ug/m3 (it was above this level in 2018.)

While the levels have worsened since bushfires began to burn in October, on September 30, 2019, the levels at St Peters Interchange were approximately PM 10: 37 ug/m3, Cnr Campbell and Church Street (close to school and community childcare) PM 10: 27 ug/m3; and St Peters School PM 10: 22 u/gm3.

A similar pattern can be observed at a Kingsgrove monitor on the southern side of the M5 which is not far from where many people are working and a children's park and homes. The PM 10 levels here are currently averaging in mid-December, approximately **43 PM 10 ug/m3**; This level, which is likely the result of road emissions from the M5 East, light industrial and WestConnex construction, would suggest that the desk-top computer models used by the RMS may not be close to actual levels.

The levels of PM 2.5 are even more worrying, given the dangerous nature of fine particulate matter and the research finding that there is no safe level. The current levels are higher than the cumulative scenario in the Air quality study at many of the community receivers that will be impacted by this project. Again, most of the real-time Westconnex monitors have been averaging not just slightly above the national goal of 8 ug/m3 but well above. This can be seen by examining monthly Ecotech reports and the audit report of six months of monitoring.

- St Peters School is showing an average annual level of 14 ug/m3 which is 75% above the national goal and well above the WHO goal. It is also above the US more conservative goal.

- St Peters Campbell Street is showing a rolling annual average of 13.5 u/gm3.

- St Peters Interchange is showing a rolling annual average of 13.2 u/gm3 (approximate)

- Arncliffe - West Botany Street - 10.5 u/gm3 (approx.)
- Eve Street - over 11 u/gm3 (approx.)
- Kingsgrove MOC - above 15 11 u/gm3 - a very high level and more than 85% above the national goal of 8 u/gm3.

Daily exceedances of the PM 10 and 2.5

We refer you to Air Noise Environment Pty Ltd Audit report for the first six months of Ecotech monitoring for 8 stations along the New M5 that began in late 2018. NSW Planning has this document because it was prepared under Condition E 12 for the New M5.

On page 24, you will find a table including the evidence listing exceedances at monitors in the first half of 2019.

We have compared the number of daily PM 10 exceedances with the worrying OEH results at Singleton and Armidale up until early December this year and found that there are far more at St Peters and Kingsgrove. (Currently more than 90 for the year at St Peters Interchange). This compares to about 37 at Singleton which has had a poor year due to fires, drought and coal. We were surprised that the air quality could be so poor. A large number of workers work near this site and there are residents not far away. It is highly likely that air quality is just as poor at other spots around the Interchange including on eastern side of Princes Highway, near Campbell Rd.

On this issue, do not be distracted by the bushfires although they have made the situation much worse. The audit report **only** deals with results up to June 2019. Also please do not be confused by difficult to read line graph comparisons with OEH results. The issue is not whether the air quality follows regional trends but what is the level - higher or lower. For the most part the WestConnex monitors are often well above OEH regional monitors - this is no surprise but the levels are higher than ever predicted.

We ask that the assessors of this project consider the impacts of the project in the light of real world available evidence, not the artificial and uncertain world of computer models. The community of St Peters has already suffered enough due to faulty assessment and construction fatigue is at extremely high levels.

Please do not think the community will be mollified with a conditions such as this one imposed on the M4 East:

D68
(e) a Construction Air Quality Management Plan to detail how construction impacts on local air quality will be minimised and managed. The Construction Air Quality Management Plan must include, but not be limited to - (i) identification of sources (including stockpiles and open work areas) and quantification of airborne pollutants including odour, (ii) key performance indicators

for local air quality during construction, (iii) details of air quality monitoring methods, including location, frequency and duration of monitoring, (iv) methods for assessing meteorological conditions and measures that would be implemented during adverse meteorological conditions, (v) best practice management mitigation measures to minimise impacts on local air quality including, but not limited to, the relevant revised environmental mitigation measures set out in the documents referred to in condition 42, (vi) measures for minimising the release of construction emissions from the site, including plant and equipment, (vii) procedures for record keeping and reporting against key performance indicators; (viii) provisions for implementation of additional mitigation measures in response to issues identified during monitoring and reporting, and (ix) mechanisms for the monitoring, review and amendment of the Construction Air Quality Management Plan.

The public does not get access to this information. We have no idea what level of compliance activity occurs but the public monitoring results would indicate that the methods used to minimise are not working. Alternatively, if they are making a difference, the unmitigated levels must be extremely high. The monitoring results and the actual experience of residents as reported to the NSW Parliamentary Committee Inquiry into the Impacts of Westconnex, would suggest that if a Condition has been adhered to, it is not working. This means before proceeding with the Sydney Gateway Project, the community should be provided with an explanation of both the reasons for high levels near construction sites and also the ways in which the dust on the Sydney Gateway Project will be controlled differently.

We recognise that WestConnex construction is not the only contributor to these high levels. But while construction moves around over time, traffic and other background sources and extreme weather events are likely to continue in the next four years and beyond and could push the levels even higher. The authors of this EIS report argue that their assessment is conservative. WAG is not convinced by this assertion. If the assessment was conservative, the extreme weather, bush fire and drought episodes would be factored into both the construction and operational report.

(All current results from the New M5 monitoring can be found here
http://airodis.ecotech.com.au/westconnexm5new/index.html

Wendy Bacon and Luke Bacon: *Westconnex : St Peters dirty secrets exposed*
http://www.wendybacon.com/2019/westconnex-st-peters-dirty-secrets-exposed/

We ask that the EPA and the Health Department require a more rigorous approach to air quality impacts than a desk assessment provides with its table of ranking of risks. These tables have not proved to be reliable indicators in the past.

For example, this statement is found on page 12-15,

> *Management and mitigation measures from the Construction Air Quality Management Plan (see section 12.7) would be implemented to minimise dust and mitigate the effects of construction on local air quality. With the application of the proposed measures, the risk of dust would be substantially minimised and well managed. The measures are expected to be effective in reducing dust to levels such that dust would not affect aviation safety*

Similar assurances were made for the New M5 and the M4/M5. But it is clear from earlier monitoring reports that students at St Peters School were exposed to daily exceedances when this did not occur.

The Ecotech results also provide further evidence that statements and assurances such as this cannot be taken at face value by the community.

We also refer to the first hand evidence provided by residents to the Parliamentary Inquiry into WestConnex.

On page 12-29, the author of the report states:

"While the potential for cumulative impacts with the M4-M5 Link are not considered to be high, largely because of the separation distance between the two projects, the measures provided in section 12.7 would address this risk."

Given the high levels already being experienced at the St Peters Interchange, we do not accept at face value these assertions.

"The proposed measures for dust control are routinely employed as 'good practice' on construction sites in NSW and are therefore expected to be effective in controlling dust generation. " 12-31

Again WAG rejects this statement. On many occasions, the dust at St Peters Interchange and Kingsgrove has gone out of control, recording levels of 300 or 400 PM 10. This has impacts on the community. These events do not just occur on poor air quality days in the rest of Sydney. These spikes result contribute to many daily exceedances and are reflected in the overall annual average levels.

These construction impacts are not short term. They are medium term. In the case of St Peters, the impacts have already been felt for several years. Assuming the predictions are correct, the short and long term environmental future for the many thousands of residents living around the airport is not as healthy as Sydney's residents should be able to expect. This is especially galling because of the hundreds of times, the RMS in house Air Quality expert, Andrew Mattes, assured residents attending information sessions that our air quality is very good and always getting better.

The air quality chapter does not provide sufficient information about the analysis that led to the predictions.

More on Air quality and operational impacts

The prediction is that there will be more traffic in the area as a result of the project. (Table 12.6).

There needs to be a clearer explanation of the fall in emissions predicted from 2016 to 2026. On what is this based? Has the dramatic fall already begun for PM 2.5 emissions? From existing results, this would seem to be unlikely. Little decrease or increase in air quality as a result of emissions is predicted between 2026 and 2036. .

Table 12.8. Who are the authors of these tables? On what research and assumptions is this based. The base year is 2016 but we are already nearly in 2020. What do current trends suggest? It is not clear who has done the studies to supply this information. The community needs this information.

12.5.2
For several air quality metrics (notably annual mean PM2.5 and 24-hour PM10 and PM2.5), exceedances of the criteria were predicted to occur both with and without the project. This was

because of high background concentrations. In other words, the background levels already exceed the relevant criteria without the project.

Previous road projects have mostly been approved on the basis that they would achieve air quality goals. This project is not predicting that the project meets the goals. The actual predicted levels (buried in the technical report) seem lower than is likely to occur.

- **Actual predicted levels should be published at the front of the report not at the back.**

- **WAG rejects the notion that all that should matter in this assessment is RELATIVE changes. If all other road projects and impacts of a changing climate have already produced higher levels (against predictions), planning authorities should be addressing and coming up with solutions to remove traffic from roads, not approving projects that will further increase them or reduce them in tiny ways.**

- **The report acknowledges that the issues in assessing relative changes as a result of this project are very complex. It is likely also that the predicted changes are very uncertain.**

- WAG could find no validation research for the GRAL model in the Air quality Technical Paper. PM 2.6 is dangerous and one of our greatest concerns.

- The reports states: 12.5.2 “Only a very small proportion of receptors were predicted to have larger increases and these were near proposed new sections of road.” These receptors need to be more clearly identified and considered much more closely than they have been in this report.

- “Marked increases in pollutant concentrations on the new roads associated with the project (Terminal 1 connection, **St Peters interchange connection,** and the Qantas Drive upgrade and extension). Planning will be aware that Transurban and WestConnex are promoting the St Peters Interchange as a future part. WAG has never considered that it is advisable to encourage children to play or others to exercise in the middle of a spaghetti interchange

The maps appear to show mauve or purple coloring in the areas near St Peters, suggesting that hundreds of residents and workers will experience even worse air quality as a result of the Sydney Gateway project.

The scenarios with and without the project will not meet national goals for daily averages of PM 10. This represents an absolute failure of NSW transport planning. The air around the airport where many people work will become worse.

The report states: “The highest predicted concentration at any receptor in any scenario was 13.6 µg/m3 .” It is not clear exactly where this is. We note that the PM 2.5 annual mean is predicted to get worse in up to 44 % of receptors depending on the scenario. This is very disturbing given the high levels currently observed. The government should be working on solutions that improve the deteriorating air quality rather than planning in ways that worsen the situation for some and improve it slightly for others, while still leaving them above national goals.

We reject the idea that a project should be approved simply because it only increases pollution by no more than 1.8 µg/m3 at any receptor. The impact of this should be considered in the light of the actual levels, including how far they are above the national goal at the current time.

The air quality chapter does not provide sufficient information about the analysis that led to the predictions.

Odours

The EIS anticipates that offensive odours are likely to escape from the former Tempe landfill - “ The project would involve work at the former Tempe landfill, which would have the potential to generate odour associated with the exposure and management of waste material. In addition, as the project would involve removing sections of the existing landfill cap at the former Tempe landfill, there is the potential for the release of trapped landfill gases resulting in increased odour potential.

After the dire experience of residents in the St Peters neighbourhood of offensive odours from the New M5 St Peters Interchange (SPI) site in 2017, we are relieved to see that potential offensive odours escaping during construction has been identified as a risk. We are relieved

that the EIS proposes a method for identifying potential sources and dealing with them, including an odour management strategy, are required in advance of construction.

The scenarios and discussion in TWP 17 imply that the odours will be noticed and reported by "sensitive receptors" around the old Tempe site, not on the site itself. Likewise the workforce is not identified as receptors which is unfortunate for those workers.

It is impossible to tell in the technical description in the TWP, eg the "2 OU assessment criterion", whether the allowable volume of offensive odours are reasonable or not. What we can say from the SPI experience is that if an offensive odour is detectable more than a kilometre from the source, it is too strong to be tolerated and requires an immediate response.

We note that the "Representative sensitive receptor locations" (Table 4-1, p. 26) do not include the Tempe High School nor the St Peter's School and childcare centre. The discussion seems more concerned about odours being detectable at Sydney Airport. While this wouldn't improve Sydney's reputation as a tourist destination, the impact on children in schools etc or on residents should be rated as an adverse impact.

While these two "receptors" are on the edge of the Tempe landfill surrounds, the 2017 experience was that the prevailing on-coast winds pushed the stink from the SPI across Sydney Park, up to Sydney Park Rd, to the end of King St near St Peters Station and across the Princes Highway and Unwins Bridge Rd. It made life for residents a misery for months and kept the community's children out of the parks and playgrounds and away from school on the worst days.

It is recommended that as soon as the workers on site detect an odour, work ceases until the source is identified and dealt with. In addition, if the odour is identified on one of the receptor sites and reported to the contractors and to the EPA, that work on the most likely source be stopped and the offensive odour dealt with.

It is strongly recommended that the State Significant Infrastructure provision of EPA Act (S.5.12) be amended to empower the EPA to stop work where an odour is detected until the source is identified and dealt with. If it is discernible then it is an exceedance. There are no reasonable levels for an offensive odour.

Regarding prevention, surely the EIS should recommend that leachate found on the Tempe landfill site should be pumped out with care as soon as it is found to prevent odours escaping. It should be treated as any other contaminant found on site. The gases from the old landfill, the contaminated soil as well as the odours, are health hazards from which the workers on site and the surrounding residents and other workforces should be protected. Since the discussion in table 3.4 "Assume[s] maximum five disturbed waste locations at any one time (for waste

movement)" it seems that instead of dealing with this site as one with significant hazards which should be handled with care, the business as usual, bulldozer approach will be taken rather than caution for the sake of the workers and others potentially at risk.

Given that experience with the St Peters Interchange over several months in 2017, we are very concerned about the management of odours at the old Tempe Landfill. It is disturbing that even when foul, nauseating odours permeated a whole region, the NSW EPA did not have the powers to stop work. We propose that the EPA Act should be amended to restore these powers to the NSW EPA, even in projects which are classified as Critical State Significant Infrastructure.

Climate change and its local impact.

Assessing the impact of this project in both the construction and operations phase, the EIS admits that construction could well have adverse impacts, with greenhouse gas (GHGs) emissions, heat and dust (see p.26.2 of TWP26).

As found in the EISs for the 3 stages of WestConnex, the "savings" of vehicle emissions are apparently based on anticipated, average higher speeds for the heavy vehicles, promoting better fuel efficiency. We note that adopting higher fuel efficiency and emission standards for vehicles has been resisted consistently by federal and state governments for the past decade. Consequently the statement, "future improvements in fuel efficiency and vehicle type **may** further reduce greenhouse gas emissions throughout the transport system in NSW" (p.26.9) strikes us as a pious hope.

The project will itself add to carbon emissions, from the concrete structures and from the anticipated, increased vehicle traffic. Since the whole point of the project is to accommodate the increased amount of road traffic – instead of looking for alternatives – it is not possible to assert on the basis of traffic speeds alone that this will reduce emissions.

The basis for anticipating that GHGs and urban heat will be reduced or mitigated lies in the "detailed design stage", a strategy familiar from the EISs for the 3 stages of WestConnex. The Business Case Summary refers to "environmental savings" without any supporting detail. It is impossible not to be quite cynical about claims of reduction in emissions.

24 hectares of vegetation will be lost. Intensified development is anticipated and factored in for the suburb of Mascot with an estimated four-fold increase in number of dwellings.

The human health TWP notes:

*"– The construction phase of works has the greatest potential for negative impacts as a result of traffic changes during construction, property acquisitions, visual changes, loss of some green space and existing recreation facilities and changes in access/cohesion of local areas. These may result in increased levels of stress and anxiety with**in the community. In many cases, the impacts identified are either temporary (associated with construction only) and/or mitigation/management measures have been identified to minimise the impacts on the community." (TWP15 11.1)***

While the increased morbidity may be statistically negligible, it does not oover many significant health impacts. The construction phase of 3 years, is not temporary. For some residents, it will further erode an already congested environment and for others it will follow 4 years of demolition and construction disruption (WestConnex and the Sydney Metro) and negative impacts in the St Peters, Sydenham and Tempe neighbourhoods in particular and more generally in the vicinity. For children in these communities this represents a large span of their lives, and the stress and ill health impacts will affect them for these years in succession. It beggars belief this will have no lasting impact. And of course this has affected the health of the elderly and people with existing respiratory and cardiac impairments.

Climate change will continue for the foreseeable future and will exacerbate the impact of the urban heat with no new vegetation able to mitigate this impact for a decade at least. The additional GHGs and PM pollution and heat impact this project will cause at a minimum in the construction phase should not be discounted. The experience of the St Peter's neighbourhood with WestConnex's impact are that:

- · we have lost a key local refuge from the heat in summer, the south-east, cool corner of Sydney Park;
- · we have lost 100s of mature trees, in our streets and pocket parks;
- · we endured higher levels of pollution; and
- · now in the hottest and driest spring in NSW history we suffer from the heat and light reflected from wide expanses of the new hard, concrete road and footpath surfaces with nothing to mitigate it.

These experiences should inform the EIS for future projects, not be ignored by authors of reports.

The EIS for this project, using what are questionable numbers and a limited technical assessment of the climate impact continues to discount the human impact locally as well as the greater impact of its emissions. Without a dramatic change in building standards to reduce heat and emissions, without a substantial percentage change in the vehicle fleet from petrol and diesel vehicles to electric vehicles, anticipating the addition of more commercial, industrial,

freight and storage facilities coupled with a large surface road project it is impossible to believe the urban heat island effect and the amount of GHG gas emissions will not increase.

Given what Sydney is suffering already from climate change's impact on the drought and bushfires, another road project established to enable the movement of even higher volumes of vehicle traffic emitting more GHGs is an extraordinary decision. We question why traffic in and out of the airport has not been reduced by acquiring back the Airport Line and providing cheap transport. We also would support diversifying Newcastle Port so that there is less need for trucks to travel North.

We oppose this project because it fails to seriously consider alternatives that would have less impact on the community, improve air quality in Sydney and be more appropriate in a time of global warming.

Concern about ground movement on gas in Tempe Landfill.

Satellite imagery has already shown that movement occurred on Sydney Airport Land during the tunnelling for the New M5. This movement could continue in the future. We would have expected this issue to be considered in the assessment of landfill and gas issues on or near Sydney Airport.

Noise

Hundreds of residents will be exposed to significant rises in noise levels. All noise mitigation should be put in place before construction begins. This will be costly and WAG would anticipate that RMS will try to avoid spending money on mitigation wherever possible.

Loss of Open Space and loss of Income for Local government

We are dismayed that RMS could be considering resuming recreation and income producing lands from the Inner West Council. WAG objects strongly to both these removal of lands.

There is already a shortage of open space in this area.

The loss of the container business could lead to significant cuts to services in the Inner West. Should this occur, we expect that the Council will be fully compensated.

Removal of the containers could also increase noise levels in an already noisy area. This is very unwise and will add to health impacts from the project.

Conclusion.

The time allowed for these submissions has not been sufficient. We would welcome an opportunity to meet with NSW Planning to discuss these and other concerns.