

14 October 2015

Project Manager
Major Projects Assessments
NSW Planning & Environment
22-33 Bridge Street
SYDNEY NSW 2000

Attention: Mr Brent Devine

Dear Sir,

Environmental Impact Statement – WestConnex M4 East

The National Trust of Australia (NSW) makes the following comments on the publicly exhibited Environmental Impact Statement for the WestConnex Motorway Project M4 East.

Initially, the Trust must reiterate a number of points that it made in its February, 2014 submission to the WestConnex Delivery Authority on the public display of the WestConnex Stage One – M4 East Motorway Concept Design: -

- It concerns the Trust that, at the Environmental Impact Statement assessment stage of this massive project, contracts may already have been signed and commitments made to commence construction when the full impacts of the development may only be coming to the public attention.
- Over the past fifteen years the Trust has continued to express concern at the heritage impacts of inner urban motorway proposals and has supported mass transport options such as light and heavy rail in preference to inner urban motorways.
- While acknowledging that the increased mobility and affluence of our society and an expanding population require much improved transport facilities, the National Trust opposes further motorways being brought into the inner suburbs and central business district if they threaten areas of historical, architectural, scenic and social importance.
- The National Trust believes that the provisions of public/private partnership agreements for urban motorways should be made public and that such agreements must not contain penalty provisions for compensation payments to a motorway operator if a public transport system competes effectively with the motorway.
- The National Trust would oppose public/private agreements that disadvantage the public who do not choose to use the toll roads constructed under those agreements and believes that massive expenditure on motorway development will divert much needed public and private investment away from public transport development which can move large numbers of people more effectively and with much less adverse heritage impact.
- The constant daily movement of large transport trucks severely degrades the urban environment and the National Trust urges that rail transport should be the preferred means for transporting container goods related to Port Botany and Sydney Airport. The Trust would oppose motorway proposals which promote increased large truck movements through urban precincts, particularly those with heritage significance.
- The National Trust acknowledges that inner city motorway development will be inextricably linked to residential/commercial redevelopment of higher densities in the zones adjoining the motorway and consequently, would oppose such development, or elements of that redevelopment when it: -



- Impacts upon, or degrades the values of adjoining, Heritage Conservation Areas,
- involves the demolition of Listed Heritage Items,
- involves the demolition of places which have been removed from Heritage Lists on non heritage-based grounds,
- involves the demolition of places which, in the Trust's view are of indisputable heritage significance, but which have been denied statutory heritage recognition.

The National Trust has had a long history and involvement in campaigning with the community to protect inner urban heritage.

In 1972 the National Trust opposed the North-Western and Western Expressways which would have cut a swathe through Glebe, demolishing 800 homes and the property "Lyndhurst", to the steps of the Sydney Town Hall.

On 26 February, 2014 the Board of the National Trust of Australia adopted a Policy on the Heritage Impacts of Urban Motorways. This Policy built on and reiterated earlier positions and policy statements including:

- National Trust: *Policy Statement on Urban Freeways* (1976)
- *National Trust Policy on Urban Freeways* (1981)
- National Trust Discussion Paper: *Towards a Transport Policy for the National Trust* (1989)
- National Trust Policy Paper: *Transport – The Heritage Implications* (1995)
- Trust Alert: *Motorway proposals threaten inner city Urban Conservation Areas* (2005)

National Trust Policy on the Heritage Impacts of Urban Motorways (2014)

1. While acknowledging that the increased mobility and affluence of our society and an increasing population require much improved transport facilities, the National Trust will oppose further motorways being brought into the inner suburbs and central business district if they threaten areas of great historical, architectural, scenic and social importance.
2. The National Trust will oppose the loss of public parklands for inner urban motorway construction, including both permanent loss involved with a motorway route/connection ramps or shorter term alienation during the construction phase.
3. The National Trust believes that the provisions of public/private partnership agreements for urban motorways should be made public and that such agreements must not contain penalty provisions for compensation payments to a motorway operator if a public transport system competes effectively with the motorway.
4. The National Trust would oppose public/private agreements that disadvantage the public who do not choose to use the toll roads constructed under those agreements.
5. The National Trust believes that massive expenditure on motorway development will divert much needed public and private investment away from public transport development which can move large numbers of people more effectively and with much less adverse heritage impact.
6. The National Trust believes that the constant daily movement of large transport trucks severely degrades the urban environment and will urge that rail transport should be the preferred means for transporting container goods related to Port Botany and Sydney Airport. The Trust would oppose motorway proposals which promote increased large truck movements through urban precincts, particularly those with heritage significance.
7. The National Trust acknowledges that inner city motorway development will be inextricably linked to residential/commercial redevelopment of higher densities in the zones adjoining the motorway and consequently would oppose such development or elements of that redevelopment when it;
 - Impacts upon or degrades the values of adjoining Heritage Conservation Areas,
 - involves the demolition of Listed Heritage Items,



- involves the demolition of places which have been removed from Heritage Lists on non heritage-based grounds,
- involves the demolition of places which, in the Trust's view are of indisputable heritage significance but which have been denied statutory heritage recognition.

Having regard to this Policy, the Trust has examined the Environmental Impact Statement's documented impacts on heritage and notes the following:

Listed Heritage Items to be demolished

- 11 and 23 Sydney Street, Concord, Rare examples of Victorian houses in Canada Bay
- 64 Concord Road, Concord, example of transitional Victorian/Federation house
- 9 Wattle Street, Haberfield, an example of John Spencer-Stansfield's Design No 1
- 19 Wattle Street, Haberfield
- 21 Wattle Street, Haberfield
- 23-25 Wattle Street, Haberfield
- 35 Wattle Street Haberfield
- 37-39 Wattle Street Haberfield
- 41-43 Wattle Street, Haberfield
- 51 Wattle Street, Haberfield
- 53 Wattle Street, Haberfield
- 46 Martin Street, Haberfield
- 164 Ramsey Street Haberfield.
- 92-94 Chandos Street, Haberfield
- 96 Chandos Street Haberfield

Potential Heritage Items to be demolished

- 2 Short Street East, Homebush - a fine example of interwar bungalow with Arts and Crafts style details
- 15 Young Street, Concord – an example of a Federation Arts and Crafts style house with unusual decorative pressed metal oriel window apron
- 54C Sydney Street, Concord - an unusual example of an interwar bungalow with Arts and Crafts influences
- 56 Sydney Street, Concord – an example of a Federation bungalow
- 71 Concord Road, Concord – an example of a good intact transitional Federation/interwar bungalow

Properties proposed for demolition within the Haberfield Conservation Area

- 53 houses
- 29 of these contributory to the values of the Conservation Area
- 2 intact tree lined streets – Sydney & Edwards Streets
- Opening the back fences of other houses to the public domain



Properties proposed for demolition within the Powells Estate Conservation Area

- 11 dwellings
- 10 of these are contributory to the values of the Conservation Area
- 2 are individually listed Heritage Items

Partial demolition with major consequences

- Wesley Uniting Church, 81 Concord Road

Conclusions

The National Trust notes that this M4 East is only one section of the WestConnex Motorway and that there will be additional heritage impacts relating to the St Peters Interchange and the future link between Haberfield and St Peters.

In the Trust's view the heritage impacts of the WestConnex Motorway are severe. The Trust must question whether the financial commitment for the total project in today's dollars of \$15 billion (inevitably set to rise) would be much better allocated to public transport.

Public transport in all its forms (heavy rail, light rail and buses) has much greater potential to remove motor vehicles from roadways, reducing traffic congestion.

The ***Sydney Trains Website*** explaining "*why is rail travel a better choice for the environment?*" puts the following case –

Greenhouse gas emissions per passenger kilometre for rail transport is up to five times less than that of car transport.

The Australian Rail Association has documented that only 2.6% of Australia's transport greenhouse gas emissions are attributable to rail. This 2.6% includes both passenger and freight rail so, in fact passenger rail contributes even less.

A train line can move 50,000 people an hour. Compare this with a freeway lane which can move 2500 people an hour.

Moving 1,000 people requires either 1 eight carriage train or 15 buses or anywhere from 250 to 1,000 cars. This quantity of car travel would then require 1.37 hectares of parking space in the Sydney Central Business District.

Urban rail transport is seven times safer than road per passenger kilometre.

The external costs of rail in terms of noise, air pollution, accidents, infrastructure deterioration and congestion are much lower than using your private vehicle.

The National Trust lodges its objection to the WestConnex M4 East proposal because of its severe impact on Listed Heritage Items and Heritage Conservation Areas and because, in the Trust's view, it diverts much needed public and private investment away from public transport development which can move large numbers of people more effectively and with much less adverse heritage impact.

Yours sincerely

Graham Quint
Director, Advocacy