Submission: WestConnex M4 East Environmental Impact Statement (SSI 6307)

To the Director, Major Planning Assessments, Department of Planning

I am writing to express my concerns and strong objection to the WestConnex M4 East motorway proposal.

Construction of radial motorways in urban areas is known to be wasteful, costing tax-payers far more than budgeted and failing to deliver on the stated aims, while providing extortionate profit-making opportunities to developers, banks, financiers, construction firms and associated industries. The shortcomings of the public-private model mean that operators are absolved from the consequences of under-performance and of the obligation to run the businesses in the public interest. This inevitably leads to higher tolls and often to business failure with the tax payer picking up the tab.

These projects do not facilitate efficient urban transport services but simply encourage more car use, up to and beyond road carrying capacity, with all the negative environmental and social impacts this entails. After decades of deferred to the multi-national road construction industrial complex at the expense of public transport, the community, here and overseas, is finally realising that cities can only cope with so many motor vehicles after which transport efficiency is reduced and health, safety, environment and social costs increase dramatically. WestConnex is guaranteed to reduce overall transport efficiency and increase congestion, air pollution, noise, environmental damage and negative social impacts. Channelling more cars into the inner city at a time when existing road infrastructure is already overwhelmed and we are trying to reduce their number suggests that WestConnex is neither an efficient and sustainable solution to Sydney's traffic congestion problem nor a satisfactory response to the city's urgent transport infrastructure needs.

The NSW Government's decision to sign multi-billion dollar contracts for WestConnex before a business case was demonstrated and this EIS was placed on public exhibition demonstrates that the government knows there is much to hide. Thinking that you can treat the democratic process as a hindrance to government authority undermines community confidence and reveals this supposed community consultation process as a sham. Particularly as this EIS makes a big deal of benefits of the project without addressing the negative impacts along the whole route. How can this be an even handed and transparent process?

This project will increase car numbers at the expense of public transport with increasing environmental and social impacts that have been completely ignored in the planing process which has focused of assumed future benefits that have manifestly failed to materialise in countless cases both here and abroad in the past. I object to the way this project has been secretly rammed through and because it fundamentally fails to provide a long term solution to traffic and congestion.

As the number of cars inevitably increases up to and beyond the WestConnex motorway's carrying capacity, there will be a consequent increase greenhouse gas emissions and global warming and this is completely indefensible. According to the Intergovernmental Panel on Climate Change (IPCC) the transport sector was responsible for approximately 23% of the world's total energy-related CO² emissions in 2010. Unless 'aggressive and sustained mitigation policies' are implemented, transport emissions could increase at a faster rate than emissions from any other energy end-use sectors. The long term sustainability of urban transport systems has to be based on a modal shift to lower-carbon transport systems by increasing investment in public transport, walking and cycling infrastructure. The WestConnex project will include construction of numerous 30 metre high exhaust stacks including three for the M5 tunnel alone. The design of these stacks is not environmentally sound.

WestConnex will also impact on open space and biodiversity. The open space and public parks that will be lost, including bushland in the Inner West and South West, are a very high price to pay in an urban area already lacking adequate open space, natural areas and habitat connectivity and suffering ongoing biodiversity loss. The impact on biodiversity along the motorway corridor and surrounding areas has not been adequately assessed in the EIS. There is no doubt that flora and fauna, including endangered species, are at great risk. The environmental impacts must be dealt with properly by government before proceeding with projects like this. I am particularly concerned about the loss hundreds of mature trees along the planned route and the lack of any adequate measures to compensate for their loss. I understand that 1.4 hectares of the 1.8 hectare Cooks River Castlereagh Ironbark Forest which was protected as 'a critically endangered ecological community' is now to be destroyed.

Economists and sociologists have long known that the more radial urban motorways are built, the more people are encouraged to drive - this is the of the 'induced demand effect'. The NSW State Government must be aware of this but it has been downplayed in both the decision to proceed and this EIS. WestConnex predictions show that by 2031, traffic volumes will increase significantly on key roads in the target area and this means traffic congestion will just get worse. Traffic on Parramatta Rd at Homebush will increase by 46% with average weekday traffic climbing from 33,600 to 49,800 by the year 2031. East-west traffic along Lyons Rd, Dobroyd Parade, Parramatta Rd and New Canterbury Rd will jump by about 48%, averaging around 193 cars a minute, 24 hours a day. More than 31,000 extra cars will feed into the inner-west every day, onto small residential streets and into Newtown and Enmore, where negative social, health

and environmental impacts of high road traffic levels are already excessive. The proposed tunnel linking the M4 and M5 in Stage 3 of the project will result in very high traffic densities. WestConnex's own modelling shows that by 2031 the M4 East will reach capacity. \$15.4 billion would more than pay for a fully integrated public transport system and leave funds for other vital infrastructure like schools and hospitals.

The M4 East project will impact on four main waterways and their associated sub-catchments. A total catchment area of 1,553 hectares will potentially experience significant surface water quality impacts and other environmental impacts including soil erosion, pollution of groundwater, potential asbestos contamination in soils and increased stormwater runoff and contamination of water quality in local waterways. Construction work will cause potential contamination of downstream waterways and groundwater, impacting on aquatic and riparian habitats, unless strict EPA guidelines are imposed and enforced. Accidental leaks or spills of chemicals, fuels, oils and greases from construction machinery, will result in pollution of local waterways and groundwater sources. During operation the discharge of stormwater runoff and direct deposition of airborne particles, is likely to cause acute or chronic contamination of soil and water quality in downstream waterways and groundwater systems. I note that WestConnex is proposing to install water treatment plants, gross pollutant traps and spill-containment basins to mitigate some of the potential surface water quality impacts, but these proposals are inadequate for the scale and scope of the project and the significant risks involved, and will themselves have further significant social and environmental impacts.

There is strong evidence about the dangers to human health from vehicle exhaust pollutants, especially asbestos dust and tiny particulate matter. These tiny particles can penetrate deep into the lungs and are known to cause premature mortality, worsen heart disease and asthma, and cause cancer. In the WestConnex air quality modelling for PM2.5s (particulate matter that's less than 2.5 microns in diameter), the results show that the air quality at the 31 sites modelled across the M4 East area will greatly exceed the proposed national standard of 8 microns per cubic metre of air by 2021. The WestConnex modelling also shows the air quality for a large section of Sydney including Haberfield, Five Dock, Ashfield, Burwood, Strathfield, Concord, Canada Bay, Homebush and Flemington, which is home to tens of thousands of residents, will be about 25% worse in the next 6 years than the target air quality standard for these dangerous pollutants. Unfiltered ventilation exhaust stacks will be located less than 500 metres from public schools, childcare centres and nursing homes in the west, south west and inner west suburbs on the WestConnex route. Diesel exhaust consists mostly of particles sized PM0.5 and smaller (i.e less than 0.5 micrometres and at least one fifth smaller than PM2.5). There is no measurement in the M4 EIS of the quantity of these particles that drivers will be exposed to in tunnels. The claim that there will be less emissions and pollution with WestConnex due to free flowing traffic just doesn't stack up. Total traffic east-west across this part of Sydney will jump 53% by 2031 with dramatic impacts on air quality. The public health impacts of increased noise, traffic congestion and disrupted social connectivity also very significant and of great concern to me.

Sydney has already lost many heritage sites to high density development without regard for the damage to diverse social and cultural history of those localities. WestConnex will damage or destroy many important heritage sites in Heritage Conservation Areas. These are of significance, not only to local communities but to all Australians. Parts of the heritage suburbs of Ashfield and Haberfield are threatened by WestConnex Stage 1, as are Newtown, St. Peters and Enmore (where I live) in stage two Stage 2. Once these suburbs are ruined they are gone for good.

Community cohesion and access to amenities are hard enough to establish, taking many years to develop and requiring careful, sensitive planning. The WestConnex project will bring community destruction in suburbs all along the 33 km route which will be carved up by huge multi-lane roads. Hundreds of people will be affected by compulsory acquisitions of their homes and businesses, often without adequate compensation. Communities already suffer from limited public green spaces in the greater Sydney area in which they can interact and relax, this project threatens to take away the little some have and will further deprive them of a world class community building public transport system because of the massive cost of this road project. Families, friends and neighbours are being separated and community access networks and social cohesion reduced. while the impact is most significant for those forced to move, it also affects the hundreds who remain. Local communities will be carved up by multi-lane roads separating one side of suburbs from another making it difficult for residents to access to social infrastructure. Communities will be subjected to years of disruption and traffic chaos during the construction phase of the tollway creating stress and loss of amenity. Pedestrians and cyclists will be impacted as they face increased traffic density on key roads and increased travel times, affecting their health, safety and wellbeing.

I also have grave concerns about the way the WestConnex project has been developed and allowed to progress without public scrutiny and engagement. There are many unanswered questions concerning the purpose, governance, oversight and economic rationale for this major infrastructure project. The State government seems to believe that the less citizens are allowed to know and criticise, the easier it is for flawed projects to be pushed through so that their negative impacts are not able to assessed for years when it will be far too late to do anything about. The lack of transparency around the WestConnex project, including state and federal governments' refusal to table documents detailing the cost-benefit analysis or business case, is anti democratic and opens the door to less accountable policy development in the future and to potential for more of the corruption and cronyism which NSW governments have been known for in the past. No

business case has been revealed for WestConnex, the largest infrastructure project in Australia today at a projected \$15.4 billion dollars. In Dec 2014 the NSW Auditor-General noted that there were 'shortcomings in the level of independent assurance provided to the Government'. According to the Government's operating framework, an additional 4 'Gateway' reviews should have been conducted. The NSW Auditor-General noted fundamental conflicts in the fact that WestConnex steering committees and boards also provided assurances to Government. The Cross City Tunnel was a privately financed, constructed, owned and operated tollway. It was completed in Aug 2005 and went into receivership in 2006 and 2013, and will pass into public ownership after 18 December 2035. As of June 2014, the average of 33,057 daily movements was well below the projected traffic predictions of 90,000 vehicles per day. The Lane Cove Tunnel project was financed, designed, constructed, operated and maintained by the private sector and completed in 2007. The traffic modelling was wildly inaccurate with predictions that up to 187,700 cars would use the road every day by 2011.By January 2010, the Connector Motorway entities were forced into receivership and investors including Leighton Holdings and the Mirvac Group wrote off their interest in the company. (assume this is OK to use).In 2012 a little more than 70,000 cars passed through the tunnel each day. 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 Sydney Motorway Corporation (SMC) is the public-private company charged with delivery WestConnex. Information about SMC cannot be accessed through Freedom of Information requests, shielding it from public scrutiny.

I submit that this project must be stopped and a replaced with 'a whole of government' process to develop an integrated and sustainable transport strategy for greater Sydney, built around an efficient, universal and accessible public transport and goods and services delivery system. Cars are already choking our beautiful and productive city to death. WestConnex can only worsen congestion on public roads and increase public health, safety, environment and social costs dramatically. I call on the NSW Government to look beyond outdated neoliberal economic models and institutional inertia and work with the community to build a sustainable economy for the very challenging future we know is just ahead. Please start governing in the long term interests of the people of NSW and not for the wealth and profit of the multi-national road construction industrial complex.

Yours sincerely

Robert Irvine PO Box 112 ENMORE, NSW 2042